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Attn: Forest Planning Team

Scott Armentrout, Forest Supervisor

Grand Mesa, Uncompahgre, and Gunnison National Forests (GMUG) 2250 South Main Street

Delta, CO 81416

November 26, 2021

Re: Comments on the Draft Forest Plan and associated Draft Environmental Impact Study for the Grand Mesa, Uncompahgre, and Gunnison National Forests

Dear Reviewing Officer,

Representing approximately 2500 members nationwide, the Continental Divide Trail Coalition (CDTC) is the 501(c)(3) national nonprofit organization formed in 2012 to work with the federal land management agencies to complete, promote, and protect the Continental Divide National Scenic Trail (CDNST). The Continental Divide National Scenic Trail (CDNST) was designated by Congress in 1978 as a unit of the National Trails System. The 3,100-mile CDNST traverses nationally significant scenic terrain and areas rich in the heritage and life of the Rocky Mountain West along the Continental Divide between Mexico and Canada. It travels through 25 National Forests, 21 Wilderness areas, 3 National Parks, 1 National Monument, 8 BLM resource areas and through the states of Montana, Idaho, Wyoming, Colorado and New Mexico. CDTC's vision for the CDNST is a primitive and challenging backcountry trail for the hiker and horseman on or near the Continental Divide to provide people with the opportunity to experience the unique and incredibly scenic qualities of the area.

The CDNST passes through Montana, Idaho, Wyoming, Colorado, and New Mexico, and is administered by the U.S. Forest Service in cooperation with the NPS, BLM, and Tribal, state, and local governments, as well as numerous partner groups including the CDTC. In 2020, CDTC signed an Inter-agency Memorandum of Understanding with the U.S. Forest Service, the Bureau of Land Management, and the National Park Service,

which identifies the Continental Divide Trail Coalition as a lead national partner in the management and administration of the Continental Divide National Scenic Trail. To date, CDTC has been successful in coordinating more than 250,000 hours of volunteer stewardship and raising over \$5 million in private funds to

maintain and improve the CDNST, building positive relationships with federal land managers and local trail-focused groups, organizing special events to help educate the public about the CDNST, implementing Trail Adopter and Gateway Community programs, and encouraging Congress to continue to appropriate funding for the CDNST in the USFS budget.

Background

The Continental Divide National Scenic Trail (CDNST) is far more than a path on the ground; rather, it is the sum of the myriad scenic, natural, cultural, and historical qualities of the areas surrounding the trail that make a journey along the CDNST unique and spectacular. The CDNST is protected and maintained not only for the physical trail itself, but more importantly, for the experience it provides.

The Continental Divide National Scenic Trail Comprehensive Management Plan was approved by the U.S. Forest Service and set forth as policy in 2009. This overarching policy direction serves to implement Congress's direction in the National Trails System Act, and is an essential tool for guiding decisions regarding Forest Plan direction for the CDNST. The Comprehensive Plan also incorporates FSM 2353.42 and 2353.44b.

CDTC Has provided the following additional materials with our comments:

1. CDTC's Previous Comments on the GMUG
2. CDNST Optimal Location Review Guidance
3. CDTC's: CDT Experience Policy

Introduction to Comments

With these factors in mind, and upon review of the Draft Forest Plan and the Draft Environmental Impact Statement for the GMUG National Forest, the Continental Divide Trail Coalition is submitting the following comments.

Grand Mesa, Uncompahgre, and Gunnison National Forests contain approximately 103 miles of the Continental Divide National Scenic Trail (CDNST), within the forest boundaries. Of those 103 total miles, 83 miles are located on trails, with just over 19 miles currently located on roads.

CDTC commends the Forest Planning Team for their efforts to provide a comprehensive management plan for the CDNST within the GMUG, and we are hopeful that we can achieve a model management plan for the Trail with continued collaboration and analysis, recognizing much of the foundation for best practices already exist within the Draft Forest Plan. CDTC commends the Forest Planning Team for the breadth of information available in the form of story maps, webinars, and recorded public meetings, and were particularly excited to see the Forest include the CDNST and its corridor in the story maps to help the public get a visual of what the

CDNST management area includes and thus the potential impacts to the area. We hope that are comments provide insights into how the CDNST can be managed most efficiently and effectively in alignment with the CDNST Comprehensive Plan, and look forward to working with the Forest Planning Team, agency staff, partners, and our members to ensure that stewardship of the CDNST continues to be proactive and adaptive to ensure protection of this world-renowned trail for generations to come.

CDNST Plan Components Desired Conditions

CDTC is in support of Desired Conditions, FW-DC-DTRL-01, 02, and 03, and appreciates the detailed conditions as stated, pulled directly from the CDNST Comprehensive Plan. In addition to the conditions in the Draft Plan, the following desired conditions would help ensure the nature and purposes of the trail are preserved:

Recommended FW-DC-DTRL: Viewsheds from the CDNST are preserved to align with a Scenic Integrity Objective (SIO) of high or very high. The CDNST provides visitors with expansive views of the natural landscapes along the Continental Divide. The foreground of the CDNST (up to 0.5 mile on either side) is natural-appearing.

It is critical that the Desired Conditions clearly states Scenic Integrity Objective, to give guidance to the standards and guidelines. As the CDNST Comprehensive Plan states:

[ldquo]On National Forest System lands, the visual resource inventory will follow the procedures outlined in Forest Service Manual 2380, and appropriate handbook guidelines. The CDNST is a concern level 1 travel routes, and the scenic integrity objective is to be high or very high depending on the CDNST segment. The inventory will be performed as if the trail exists even in the section where it is proposed for construction and reconstruction.[rdquo] (pg 13)

As will be discussed further on in these comments, the current plan Alternatives do not all meet the conditions outlined in this policy. [EMPHASIS ADDED: In order to provide for the nature and purposes of the CDNST, the Scenic Integrity Objective must be a desired condition to ensure that management practices within the life of the plan continue to meet this standard in the CDNST Comprehensive Plan.]

And while the foreground is priority, the cumulative viewshed of the trail, as a ridgeline trail with sweeping views,

should be taken into consideration when actions could have negative impacts on the natural, historic, scenic, and cultural resources along the trail. As the 1976 Study Report stated, and the Comprehensive Plan reiterates, the trail is intended for, [ldquo]access to those lands where man's impact on the environment has not been adverse to a substantial degree and where the environment remains relatively unaltered.[rdquo] If the environment is altered and man[rsquo]s impact on the environment impacts the experience, including the scenic values, then the nature and purpose of the CDNST begins to deteriorate as man[rsquo]s impact grows. [EMPHASIS ADDED: These impacts should be evaluated on a site-specific basis and a cumulative basis for the trail throughout the Forest, and is especially relevant to the future of the trail as new sections of the trail are identified and constructed in the GMUG.]

The soon-to-be released USFS[rsquo] document, [lsquo]Scenic Character Descriptions for the CDNST, will be helpful in informing the agency[rsquo]s management of the scenic resources specifically related to the scenic integrity of the CDNST and its corridor, and CDTC would welcome the opportunity to discuss the preservation of these scenic resources in the future with the release of this additional tool for land managers preserving the CDNST experience.

Recommended FW-DC-DTRL: Visitors are aware of the CDNST corridor and the nature and purposes of the trail designation.

Education of visitors and trail users as to the nature and purposes of the trail is important to the continued resilience and sustainability of the trail. In addition to ensuring that users are aware of the existence of this Congressionally-designated resource, it is important to inform users of the intended uses of the trail, as outlined in the CDNST Comprehensive Plan, in order to ensure uses and user conflicts on the trail are minimal, and the cultural, historic, and natural resources along the CDNST are preserved.

Recommended FW-DC-DTRL: Conflicts among users are rare and easily resolved.

This desired condition is important to ensure that the trail experience meets the nature and purposes of the CDNST outlined in the Comprehensive Plan. Establishing this as a desired condition can guide management practices such as analyzing carrying capacity as well as evaluating the substantial interference of different uses and their related impact to the CDT experience.

Objectives

We enthusiastically support the inclusion of FW-OBJ-DTRL-04 in the Forest Plan. Relocating the CDNST off of roads is a top priority to meet the nature and purposes of the trail, and we commend this effort on the part of USFS. However, as we stated in previous comments, we would encourage the revision of this objective to state that relocation off of roads should be completed within five years of the plan[rsquo]s approval.

In addition, CDTC believes that the intent of this objective could be strengthened by adding an additional objective regarding the evaluation, and possibly the relocation, of the trail where it exists on trail, but does not meet the intended nature and purposes of the trail as outlined in the National Trails System Act and the CDNST Comprehensive Plan. As will be discussed in later in these comments, currently and in the proposed Forest Plan,

there may be miles of trail where activities and uses have altered the CDT experience, increasing the likelihood of potential substantial interference. So in order to ensure that the future of the trail throughout the GMUG aligns with the intended nature and purposes of the CDNST, we recommend the addition of the following objective:

Recommend FW-OBJ-DTRL-05: Within 5 years of plan approval, evaluate and identify trail miles of the CDNST where activities, motorized uses, and mechanized uses have substantially interfered with the nature and purposes of the trail, and prioritize those sections for relocation onto high potential routes.

Standards

CDTC is supportive of FW-STND-DTRL-05 and FW-STND-DTRL-07. However,

FW-STND-DTRL-06, as written in the current Draft Plan, needs to be refined and/or replaced to ensure compliance with the CDNST Comprehensive Plan and the National Trails System Act. As we stated in previous comments, the continued allowance of existing motorized use events should only be approved after careful analysis of impacts, as well as a determination if the event causes substantial interference to the nature and purposes of the Trail. [EMPHASIS ADDED: We urge the Forest Service to include this documentation in a Decision Memo available for public review.]

Additionally, the Draft Revised Management Plan stated the following:

[Idquo]FW-STND-DTRL-06: Existing motorized use may continue on the Continental Divide National Scenic Trail, as long as it does not substantially interfere with the trail[rsquo]s nature and purpose.

Justification: staff conversations concluded that the component[mdash]having raised early questions amongst reviewing cooperators as to what [lsquo]substantial interference[rsquo] meant[mdash] was unduly complicated and an unnecessary component. Existing motorized use will continue on motorized portions of the Continental Divide National Scenic Trail, up until if/when those routes are relocated to be separated from a non-motorized Continental Divide National Scenic Trail portion.[rdquo]

[EMPHASIS ADDED: The removal of this standard does not reflect USFS policy guidelines that can be found in the CDNST Comprehensive Plan, derived from the National Trails System Act. The relevant passage from the CDNST Comprehensive Plan states:]

[Idquo]Motor vehicle use by the general public is prohibited on the CDNST, unless that use is consistent with the applicable land management plan and:

[hellip]...

(5) Is designated in accordance with 36 CFR Part 212, Subpart B, on National Forest System lands or is allowed on public lands and:

(a) The vehicle class and width were allowed on that segment of the CDNST prior to November 10, 1978, and the use will not substantially interfere with the nature and purposes of the CDNST or

(b) That segment of the CDNST was constructed as a road prior to November 10, 1978; (pg. 18 & 19)

From this policy guideline, it is clear that there are cases where motorized use is allowed within certain sideboards, listed above. However, the removal of the above standard and the justification are not aligned with USFS policy. [EMPHASIS ADDED: The threshold of [ldquo]substantial interference[rdquo] is a standard set by the U.S. Forest Service and is codified in the CDNST Comprehensive Plan and the National Trails System Act (NTSA). Regarding the CDNST, the NTSA states:]

(c) National scenic or national historic trails may contain campsites, shelters, and

related-public-use facilities. Other uses along the trail, which will not substantially interfere with the nature and purposes of the trail, may be permitted by the Secretary charged with the administration of the trail. Reasonable efforts shall be made to provide sufficient access opportunities to such trails and, to the extent practicable, efforts be made to avoid activities incompatible with the purposes for which such trails were established. The use of motorized vehicles by the general public along any national scenic trail shall be prohibited and nothing in this Act shall be construed as authorizing the use of motorized vehicles within the natural and historical areas of the national park system, the national wildlife refuge system, the national wilderness preservation system where they are presently prohibited or on other Federal lands where trails are designated as being closed to such use by the appropriate Secretary: Provided, That the Secretary charged with the administration of such trail shall establish regulations which shall authorize the use of motorized vehicles when, in his judgment, such vehicles are necessary to meet emergencies or to enable adjacent landowners or land users to have reasonable access to their lands or timber rights: Provided further, That private lands included in the national recreation, national scenic, or national historic trails by cooperative agreement of a landowner shall not preclude such owner from using motorized vehicles on or across such trails or adjacent lands from time to time in accordance with regulations to be established by the appropriate Secretary. Where a national historic trail follows existing public roads, developed rights-of-way or waterways, and similar features of man's nonhistorically related development, approximating the original location of a historic route, such segments may be marked to facilitate retracement of the historic route, and where a national historic trail parallels an existing public road, such road may be marked to commemorate the historic route. [EMPHASIS ADDED: Other uses along the historic trails and the Continental Divide National Scenic Trail, which will not substantially interfere with the nature and purposes of the trail, and which, at the time of designation, are allowed by administrative regulations, including the use of motorized vehicles, shall be permitted by the Secretary charged with administration of the trail.] The Secretary of the Interior and the Secretary of Agriculture, in consultation with appropriate governmental agencies and public and private

organizations, shall establish a uniform marker, including thereon an appropriate and distinctive symbol for each national recreation, national scenic, and national historic trail. Where the trails cross lands administered by Federal agencies such markers shall be erected at appropriate points along the trails and maintained by the Federal agency administering the trail in accordance with standards established by the appropriate Secretary and where the trails cross non-Federal lands, in accordance with written cooperative agreements, the appropriate Secretary shall provide such uniform markers to cooperating agencies and shall require such agencies to erect and maintain them in accordance with the standards established. The appropriate Secretary may also provide for trail interpretation sites, which shall be located at historic sites along the route of any national scenic or national historic trail, in order to present information to the public about the trail, at the lowest possible cost, with emphasis on the portion of the trail passing through the State in which the site is located. Wherever possible, the sites shall be maintained by a State agency under a cooperative agreement between the appropriate Secretary and the State agency. (SEC. 7. [16USC1246])

While staff may have found the standard confusing, without amending the USFS's own policy enshrined in the CDNST Comprehensive Plan, there is no justification for the agency to depart from this standard set in policy by the agency itself. [EMPHASIS ADDED: It must be recognized that substantial interference, as the above citation describes, is a standard found in the National Trails System Act, which is law, and the law cannot be changed through an administrative process such as the revision of the GMUG Forest Plan - it would require an act of Congress. Existing motorized use may continue if the use is consistent with the applicable land management plan, and if it meets both the standard regarding whether it was grandfathered in accordance with the 1978 AND the use will not substantially interfere - it is not an either-or statement where one condition can be disregarded, as the Draft Plan's removal of this standard might indicate.]

Furthermore, while there are some existing uses that may have been correctly grandfathered in with the 1978 threshold, currently, there is likely motorized use that is occurring on segments of the CDNST within the GMUG that were not allowed on the segment prior to the 1978 date or were roads before that date. So, two evaluations need to occur to ensure the Draft Plan's compliance with the CDNST Comprehensive Plan. First, there should be an inventory of which segments of trail where there is motorized use actually were grandfathered-in in alignment with the November 10, 1978 date. Second, there then must be a site-specific and cumulative analysis of these segments where the vehicle class and width were allowed on that segment of the CDNST prior to November 10, 1978 to determine whether or not motorized-use is substantially interfering with the nature and purposes of the CDNST.

CDTC recommends that the Planning Team include this standard as it was originally written in order to ensure current and continued motorized use is compliant with the CDNST Comprehensive Plan.

Guidelines

CDTC is supportive of the guidelines stated in the Draft Revised Land Management Plan, however, we believe these guidelines should be rewritten to include the changes reflected in italics below. [EMPHASIS ADDED: As noted in our previous comments, we believe that there are proposed

Guidelines that would be more appropriately included as Standards in order to provide for the protection of the CDT corridor and the visitor experience.]

FW-STND-DTRL: If management activities result in short-term impacts to the scenic integrity of the Continental Divide National Scenic Trail, mitigation measures should be included, such as screening, feathering, and other scenery management techniques to minimize visual impacts within and adjacent to the trail [SUGGESTED NEW/REPLACEMENT corridor] (within visible foreground, up to one-half mile [SUGGESTED NEW/REPLACEMENT from] the trail at a minimum).

FW-STND-DTRL: To promote high-quality scenic, primitive hiking and horseback riding opportunities along the Continental Divide National Scenic Trail, the minimum trail facilities necessary to safely accommodate the amount and types of use anticipated on any given trail segment should be provided [SUGGESTED NEW/REPLACEMENT in order to protect resource values and for visitor health and safety.]

FW-STND-DTRL: To conserve natural, historic, and cultural resources, the CDNST should not be used for landings or as a temporary road for any purpose.

FW-STND-DTRL: To conserve natural, historic, and cultural resources, hauling or skidding along the CDNST should be allowed only where the trail is currently located on an open road and no other reasonable options are available. [SUGGESTED NEW/REPLACEMENT Design criteria should minimize impacts to the trail infrastructure, and any necessary post-activity trail restoration should be a priority for the project's rehabilitation plan.]

FW-STND-DTRL: To provide for a naturally appearing setting [SUGGESTED NEW/REPLACEMENT and to avoid visual and resource impacts], unplanned [SUGGESTED NEW/REPLACEMENT and prescribed] fires in the visible foreground (up to one-half mile) of the CDNST should be managed using minimum impact suppression tactics or other tactics appropriate for the protection of national scenic trail values. Construction of firelines by heavy equipment should not be allowed within the visible foreground of the CDNST unless necessary for emergency protection of life and property.

FW-STND-DTRL: To protect the CDNST's scenic values, special-use authorizations for new communication sites, utility [SUGGESTED NEW/REPLACEMENT corridors], and renewable energy sites should not be [SUGGESTED NEW/REPLACEMENT allowed] within the visible foreground (up to one-half mile) [SUGGESTED NEW/REPLACEMENT and middleground viewshed (up to 4 miles) of the CDNST.]

FW-STND-DTRL: To maintain the integrity of the CDNST and the values for which it was designated, new linear utilities and special use authorizations that cross the trail should be avoided. Where unavoidable, these should be limited to a single crossing of the trail per special use authorization. [SUGGESTED NEW/REPLACEMENT When authorized, linear facilities should be co-located with existing facilities.]

FW-STND-DTRL: To [SUGGESTED NEW/REPLACEMENT provide for] a naturally appearing, [SUGGESTED NEW/REPLACEMENT non-motorized setting and to avoid visual, aural and resource impacts from motorized use] on the CDNST, constructing permanent [SUGGESTED NEW/REPLACEMENT and/or temporary] roads or motorized trails across or adjacent to the trail should be avoided. Any new temporary or permanent motorized routes (roads and trails) should only be contemplated if new routes are (a) required by law to provide access to private lands, (b) necessary for emergency protection of life and property, or (c) determined to be the only prudent and feasible option. In such circumstances, any project involving construction of a motorized route across or within the Continental Divide National Scenic Trail corridor must be designed in such a manner that minimizes impacts to the scenic, natural, and experiential values of the trail.

Since many of these guidelines express intent to protect the scenic values of the CDNST, which is much appreciated, [EMPHASIS ADDED: it is critical that the inclusion of additional specificity recommended above sets the Scenic Inventory Objective of high or very high for the CDNST's .5-mile corridor and the visible foreground.] As a ridgeline trail, with sweeping views, as recognized in the Draft Plan and the CDNST Comprehensive Plan, CDTC also urges that activities in the middle ground and background that impact the viewshed of the trail, particularly from points of very high scenic value, are considered. CDTC is happy to assist in the evaluation of the entire viewshed where these activities and projects occur, and would welcome the opportunity for field visits and further consultation to ensure the impact to the CDNST's entire viewshed are minimal and mitigated.

From our previous comments, additional standards to consider that would provide for the protection of the CDNST's natural, scenic, historic, and cultural resources include the following:

FW-STND-DTRL: No oil and gas or geothermal energy leasing activities shall occur within the CDNST corridor.

FW-STND-DTRL: To protect or enhance the scenic qualities of the trail, management activities in the CDNST corridor should be consistent with, or make progress toward achieving, Scenic Integrity Objectives of High or Very High.

FW-STND-DTRL: Management of the CDNST shall comply with the most recent version of the CDNST Comprehensive Plan. If the plan is more than 15 years old, best available science can be used to adapt new management practices, as long as those practices are compliant with the Comprehensive Plan.

FW-STND-DTRL: To retain or promote the character for which the trail was designated, new or relocated trail segments should be located primarily within settings consistent with or complementing Primitive or Semi-Primitive Non-motorized Recreation Opportunity Spectrum classes. Road and motorized trail crossings and other signs of modern development should be avoided to the extent possible.

FW-STND-DTRL: Side trails to the CDNST enhance the experience along the main trail. Side trails are short trails that encompass adjacent attractions.

CDTC hopes that you will take into consideration these standards that provide for the high-quality, scenic, remote, non-motorized experience that Congress designated the CDNST for when it was founded.

Forestwide Direction Plan Alternatives

In regards to the plan alternatives, Alternative D would provide the best management plan for the nature and purposes of the CDNST. Taking into consideration the management objectives, guidelines, and standards given in the Revised Draft Plan, and those suggested above in these comments, Alternative D is most aligned with the stewardship objectives of the CDNST, particularly aligned with the primitive and remote experience for which the CDNST was created.

Alternative D

Alternative D is the alternative that would provide the CDNST corridor and trail travelers with the stewardship and experience most aligned with the CDNST Comprehensive Plan and the National Trails System Act. CDTC commends the Forest on this Alternative particularly because of the 261,000 acres of recommended areas to be analyzed as wilderness. These new wilderness acres provide the primitive experience for equestrians and hikers for which the trail was originally intended. The CDNST would run directly through the Cataract Proposed Wilderness, West Baldy Proposed Wilderness, and Lake Branch Proposed Wilderness, providing miles of trail in the remote setting on the Divide that directly aligns with the nature and purposes of the CDNST. The increased connectivity of these areas will have positive impacts for wildlife, plantlife, the underlying ecosystem, and thus the experience of CDNST travelers in the area.

Alternative D also provides the best settings, in regards to the Recreation Opportunity Spectrum, for the CDNST. The majority of trail miles, accounting for over 90% of the CDNST through the GMUG, would have a prescription of Primitive and Semi-Primitive Non-Motorized settings.

This sets the stage for the future of the CDNST through the Forest with a less developed, less motorized corridor than any of the other alternatives. With these settings, the objective regarding the rare occurrence of conflicts between users and their easy resolution is most likely to be achieved under Primitive and Semi-Primitive Non-Motorized management settings.

Under Alternative D, the Scenic Integrity Objective for the CDNST across the GMUG, is almost entirely set at high or very high. As is outlined in the CDNST Comprehensive Plan, and cited above, the objective of high or very high for the CDNST foreground is compliant with USFS policy. And while the foreground is the priority,

CDTC favors Alternative D also because the SIO identified for areas adjacent to and in close proximity to the trail corridor, accounting for the

CDNST's middleground and background, provide the highest scenic objective compared to the other three alternatives.

Alternative D is also the Alternative that would provide the best opportunity for FW-OBJ-DTRL-04 (moving the CDNST off of roads within 10 years of the plan's enactment) and, optimistically, the additional objective of relocating any CDNST trail miles (particularly motorized trail segments) that do not provide the ideal CDNST experience. The additional wilderness and roadless acres provide the most opportunity for trail relocation onto high quality potential routes. The proactive management of the areas in which these high quality potential routes could be located could help to achieve this objective within the 10 year, and even 5 year, timeline.

Alternative D provides the best opportunity for the holistic stewardship of the scenic, natural, cultural, and historic resources of the trail and the trail corridor, and even goes a step further. Alternative D provides buffers around the trail in the form of Roadless Areas and Wildlife Management Areas that are not as present in the other Alternatives. The presence of these areas in, adjacent to, and in close proximity to the CDNST corridor add to CDNST experience by providing increased connectivity, which builds healthy ecosystems for wildlife and plant life and limits the amount of noise pollution from motorized users that can disrupt wildlife activity and interrupt the experience of trail travelers looking for the remote experience for which the CDNST was intended. Furthermore, Alternative D is most closely aligned with the protection of the CDNST viewshed, including the foreground, middle ground, and background, with protections in the corridor under the Primitive and Semi-Primitive Non-Motorized settings, but also outside the corridor in close proximity and also from high points along the trail, where there are often sweeping views.

The presence of areas to be analyzed as wilderness, roadless areas, wildlife management areas which support the nature of the CDNST and the alignment of the ROS settings which comply with purposes of the trail as outlined in the CDNST Comprehensive Plan, make Alternative D the Alternative, not only providing the best experience for those on the CDNST, but also providing the best opportunity for the proactive stewardship and connectivity of the Divide landscape throughout the GMUG.

Alternative B

Alternative B does not have the ideal management areas or recreation settings that would provide an experience on the CDNST that is compliant with the CDNST Comprehensive Plan, which outlines the nature and purposes for which the trail was created and gives directive on best management practices.

We commend the Planning Team for the inclusion of 34, 000 acres of recommended areas that would be analyzed as wilderness. While very few of the additional wilderness acres overlap with the CDNST or adjacently,

the existence of these additional acres within the GMUG cultivate opportunities for wildlife, plantlife, and other natural resources to flourish relatively unimpeded, which preserves the primitive nature of the Divide and ultimately contributes to the experience of those traveling the CDNST who are in close proximity. Furthermore, the addition of 15,000 acres of new Special Interest Areas for ongoing ecological research, approximately 740,000 acres in New Management Area to balance big game habitat with trail development, and the combined acreage of Roadless Areas and Wilderness equating to nearly 50% would all contribute to the CDNST experience within the GMUG and provide for management settings that would proactively steward the trail in close alignment with the primitive environment of the Divide for which the trail is meant to give access. And these additional areas, especially those overlapping with or in close proximity to the CDNST corridor, could potentially be proactively managed for high potential routes for CDNST relocation.

While the presence of these management areas under Alternative B more closely align the Plan with CDNST Comprehensive Plan, the related settings under the Recreation Opportunity Setting are of concern. Compared to Alternative D, which is comparatively the closest Alternative to Alternative B, the settings are vastly different and would not closely align with the nature and purposes of the CDNST. Most of the concern is that Alternative B identifies almost the entirety of the CDNST as a Semi-Primitive Motorized setting. As was stated and the citation from the CDNST given above, there are criteria for allowing motorized-use on the CDNST that would represent a challenge for this particular setting.

[EMPHASIS ADDED: By applying Semi-Primitive Motorized settings to the majority of the trail through the GMUG, the agency would almost certainly not be in compliance with the CDNST Comprehensive Plan if the Forest moved forward with Alternative B as it is proposed.] Many of the trail segments were not roads before the 1978 date and/or were not open to motorized use vehicles before the 1978 date, and then also, motorized use on some segments would certainly cause substantial interference. Sections of the trail in these areas are incredibly popular, and the chance for sustained, frequent user conflict is high. [EMPHASIS ADDED: This ROS setting has highpotential to meet the substantial interference threshold set by USFS in the CDNSTComprehensive Plan and would require the relocation of the CDNST onto routes that comply with the nature and purposes of the trail.] As the National Trails System Act (passage cited in full above):

[Idquo]Other uses along the historic trails and the Continental Divide National Scenic Trail, which will not substantially interfere with the nature and purposes of the trail, and which, at the time of designation, are allowed by administrative regulations, including the use of motorized vehicles, shall be permitted by the Secretary charged with administration of the trail.[rdquo] (SEC. 7. [16USC1246])

If Alternative B was chosen, considerably site-specific and cumulative analysis would need to be done to establish a carrying capacity, track user conflict, associated mitigation strategies, educate users on trail etiquette, educate users on the nature and purposes of the CDNST, and proper signage to help ensure the best experience on the CDNST. [EMPHASIS ADDED: However, even with these proactive measures and possible mitigation, the ROS setting still has high potential to create circumstances that meet the substantial interference threshold.]

Under Alternative B, the Scenic Integrity Objective for the majority of the CDNST is high, with some segments

with a very high objective, and a few places with an SIO of moderate or low. As is outlined in the CDNST Comprehensive Plan, and cited above, the CDNST is a concern level 1 route, and an objective of high or very high for the CDNST foreground is compliant with the Comprehensive Plan and thus aligned with USFS policy. CDTC has concerns with segments within the Gunnison Basin area where the SIO is moderate or low, and mitigation strategies and additional proactive management approaches should be considered in order to reach the SIO of high or very high for the trails entirety. And while the foreground is the priority, the middleground and background of the CDNST are also of concern since they contribute to the CDNST experience. Alternative B outlines many areas that would be within the CDNST viewshed where the SIO is moderate or low, which does not provide for the ideal remote setting for which the CDNST was created.

Relatedly, CDTC is concerned with the 397,000 acres that would be considered suitable for timber. This number, within the Gunnison Basin where the majority of the trail through the GMUG is located, represents 31% of the Forest in this area. While CDTC supports sustainable stewardship practices that utilize suitable timber areas and the jobs it would create, opening a third of the Basin to timber harvesting is of concern. Timber harvesting and the ancillary activity have the potential to change the environment of the Basin in the short term, but also in the long-term and even permanently. Timber harvesting changes the environment for wildlife and plantlife, and the ancillary activities including the creation of temporary roads, increased human presence, and the presence of auditory pollution can alter migration patterns of wildlife, permanently alter wildlife habitat, and create long term restoration concerns regarding temporary roads and other project sites. Additionally, this large amount of acres being identified as suitable timber has the potential to negatively impact the CDNST viewshed, and while the foreground is the highest priority with a SIO of high or very high, the middle ground and background are also of concern. As a ridgeline trail with sweeping views, evidence of human activity related to temporary roads and changes to vegetation could potentially be seen from the trail, taking trail travelers out of the primitive and remote experience for which the trail was created. As a National Scenic Trail, these activities have the potential to directly negatively impact the CDNST's scenic, natural, and cultural values.

Alternative C

Alternative C does not provide for the ROS settings, Scenic Integrity Objective, or management practices that would steward the CDNST in a way that is compliant with the CDNST Comprehensive Plan.

Similar to Alternative B, the proposed management areas under Alternative C do not present the ideal environment for the CDNST. While we commend that this Alternative also includes Wilderness and Roadless Areas that combine to nearly 50%, the lack of Wildlife Management Areas or additional Wilderness areas around the CDNST corridor do not provide a buffer around the CNDST, overlapping or in close proximity.

Of most concern, are the Recreation Opportunity Settings that are applied to the CDNST corridor under this Alternative. Again, the majority of the trail is prescribed a Semi-Primitive Motorized setting, which would open the door to noncompliance with the CDNST Comprehensive Plan.

Additionally, there are more areas under Alternative C (than B or D) that would prescribe an area, overlapping and adjacent to the CDNST corridor, a setting of Roaded Natural. This setting is not ideal for the CDNST and is not representative of the nature and purposes of the CDNST as it was intended and created under the National Trails Act. These settings open the door to substantial interference concerns related to motorized users, and also bring the character of the trail farther away from the primitive and remote characteristics that are described in the

CDNST Study Report and elevated as policy directives (cited above) in the CDNST Comprehensive Plan.

Increased motorized activities within Semi-Primitive Motorized and Roaded Natural Settings have the potential to permanently alter migration corridors and home habitats of wildlife, and also deteriorate the experience of hikers and equestrians who seek out the trail often from the remote, unmotorized experience that the trail was created to provide. Furthermore, this plan's overall approach to open 52% of the GMUG to summer motorized use and 70% winter motorized use are of concern because of the impact that increased human activity, auditory pollution, and related ancillary activities could have on wildlife, plantlife, trail infrastructure, and CDNST traveler's experience.

The CDNST Comprehensive Plan states the following in regard to Over-Snow Vehicle:

Motor vehicle use by the general public is prohibited on the CDNST, unless that use is consistent with the applicable land management plan and:

[hellip].

(6) In the case of over-snow vehicles, is allowed in accordance with 36 CFR Part 212, Subpart C, on National Forest System lands or is allowed on public lands and the use will not substantially interfere with the nature and purposes of the CDNST.

While CDTC is supportive of responsible motorized use and the access it provides for all people to the Divide and these treasured greenspaces, this level of motorized use could have unforeseen consequences and could certainly lead to substantial interference concerns on the CDNST. Concerns such as increased user conflict, increased misuse of non-motorized trails, and permanent alteration to the environment, could lead to deterioration of the CDNST's nature and purposes, especially without proactive stewardship such as monitoring and mitigation strategies which are not explicitly outlined within the Draft Plan, and which would require additional staffing and funding to implement to ensure compliance with the CDNST Comprehensive Plan.

Under Alternative C, the Scenic Integrity Objective for much of the CDNST is high or very high, with substantial sections with an SIO of moderate or low. As is outlined in the CDNST Comprehensive Plan, and cited above, the objective of high or very high for the CDNST foreground is compliant with the Comprehensive Plan and aligned with USFS policy. CDTC has concerns with segments within the CDNST corridor where the SIO is moderate or low, as this does not follow USFS guidance or the SIO outlined in the CDNST Comprehensive Plan, derived from the National Trails System Act. Reevaluation of these scenic objectives, and mitigation strategies and additional proactive management approaches should be considered in order to reach the SIO of high or very high for the trails entirety, bringing the Plan into compliance with the relevant policy regarding the CDNST's status as a

level 1 concern travel route. And while the foreground is the priority, the middleground and background of the CDNST are also of concern since they contribute to the CDNST experience. Alternative C outlines a significant amount of acreage that would be within the CDNST viewshed where the SIO is moderate or low, which does not provide for the ideal remote setting for which the CDNST was created.

Relatedly, CDTC is concerned with the 408,000 acres that would be considered suitable for timber. This number, within the Gunnison Basin where the majority of the trail through the GMUG is located, represents 32% of the Forest in this area. While CDTC supports sustainable stewardship practices that utilize suitable timber areas and the jobs it would create, opening a third of the Basin to timber harvesting is of concern. Timber harvesting and the ancillary activity have the potential to change the environment of the Basin in the short term, but also permanently. Timber harvesting changes the environment for wildlife and plantlife, and the ancillary activities including the creation of temporary roads, increased human presence, and the presence of auditory pollution can alter migration patterns of wildlife, permanently alter wildlife habitat, and create long term restoration concerns regarding temporary roads and other project sites.

Additionally, this large amount of acres being identified as suitable timber has the potential to negatively impact the CDNST viewshed, and while the foreground is the highest priority with a SIO of high or very high, the middle ground and background are also of concern. As a ridgeline trail with sweeping views, evidence of human activity related to temporary roads and changes to vegetation could potentially be seen from the trail, taking trail travelers out of the primitive and remote experience for which the trail was created.

Alternative A

As Alternative A represents the existing plan and was created without the current guidance made available by the CDNST Comprehensive Plan, the lack of compliance within Alternative A in regards to the Recreation Opportunity Spectrum, the Scenic Integrity Objectives, and the related Management Areas make Alternative A difficult to align with policy guidelines for the CDNST.

[EMPHASIS ADDED: The ROS settings of Semi-Primitive Motorized and Roaded Natural that exist along large sections of the CDNST under this Alternative do not align with the CDNST Comprehensive Plan.] CDTC would have concerns of substantial interference and compliance with the 1987 rule, cited above from the CDNST Comprehensive Plan.

While Alternative A does provide for SIO of high or very high for the majority of the trail, there are still remaining sections under this Alternative that would have a scenic objective of moderate or low, which does not align with USFS policy guidance related to the nature of the CDNST. CDTC would also have concerns with the CDNST's middleground and background, of which there would be areas within the CDNST's viewshed that have an SIO of low or moderate and would not provide the primitive or remote settings that the CDNST was created for.

Furthermore, Alternative A, being a remnant of the existing plan, does not utilize the latest available stewardship best practices regarding Wildlife Management Areas, Wilderness Areas, Roadless Areas, or fuels reduction, all of which engage with modern forest stewardship to retain the character of the forest and preserves the cultural,

historic, and natural resources, including wildlife and vegetation, of the landscape. With this in mind, while Alternative A does provide some settings and objectives regarding recreation and scenic values, that would provide for a CDNST experience that closely aligns with the CDNST Comprehensive Plan, it lacks much of the proactive management practices that would make for the ideal stewardship of the CDNST and CDNST corridor.

Other Required Components

Adaptive Planning, Monitoring, and Carrying Capacity

In the Draft Revised Plan and the accompanying Alternatives, CDTC would be supportive of strengthening strategies for monitoring recreation use on the CDNST, which is essential in determining whether current uses are impacting the nature and purposes of the CDNST. Such an analysis would also help to determine a carrying capacity for the approximately 100 miles of trail located within the GMUG, and help to plan for the future relocation of close to 20 miles of high-quality trail that need to be moved off road. [EMPHASIS ADDED: Not only would this help the relocation objective, but will also be helpful in informing whether or not the substantial interference threshold is met on existing trails, especially those with uses that are not directly aligned with the intended purposes of the CDNST.] This is particularly relevant under Alternatives A, B, and C, in which significant sections of the trail have an ROS settings of Semi-Primitive Motorized and Roaded Natural and SIO conditions of Low or Moderate.

As CDTC suggested in previous comments (attached), in regards to analyzing the carrying capacity of the CDNST, we recommend the following actions:

1. Include a monitoring indicator measuring the number of water sources to be developed in the next 5-10 years.
2. Add a monitoring indicator to measure increases in signage and suitable access over the next 5 years.
3. Establish carrying capacity and monitoring with standards and indicators relative to the CDNST.

The more information available to the agency and the public concerning the number of travelers on the Trail, the more proactively the cooperative stewardship model is able to adapt and respond. CDTC would enthusiastically welcome the opportunity to collaborate on what data would be the most useful and how to utilize that information in regards to stewardship of the CDNST corridor.

High Potential Routes

Within the Draft Revised Plan, CDTC commends the objective to relocate the trail off of roads within the life of the Plan. In order to achieve this objective, and to provide for high quality routes that meet the nature and purposes of the CDNST, CDTC encourages the identification of high potential routes within the GMUG that can be proactively stewarded keeping in mind the characteristics and values of the trail, as outlined in the CDNST Comprehensive Plan. As such, it would be useful within the Forest Plan to identify areas or corridors,

approximately 4 miles wide for maximum flexibility, where the trail could be relocated in order to ensure the management of the areas maintains the high potential routes' high quality and does not deteriorate to a level that is not ideal for CDNST relocation. Lack of proactive stewardship of high potential route areas could lead to significant delays, the inability to meet the relocation objective, and/or the inability to meet the nature and purposes of the CDNST.

In order to proactively steward future areas, the Alternatives within this Plan should identify these areas in order to manage the natural, historic, scenic, and cultural values in a way that aligns with the values outlined for National Trails in the National Trails System Act. The corridor identified for high potential routes should be flexible enough to accommodate the Optimal Location Review (described briefly below and attached) and provide space for the trail as well as the .5-mile corridor on either side.

The impacts of fire management, timber production, recreational use prescription, range management, vegetative management, and wildlife management all impact the current routes of the CDNST, and current management practices will impact the ability of the Forest Service to relocate the trail onto high-quality routes in the future. The ROS settings under most of the Alternatives (particularly C, and B in segments), do not take into consideration high potential routes for the future of the CDNST. Without accounting for these ROS settings where high potential routes exist, these routes are under threat of degradation that would deteriorate their classification as a high potential route. Current route settings do not take into account activities and actions such as motorized use, timber production, or road construction for these high-quality potential routes.

Even though the plan states a goal of moving the CDNST completely off of roads, CDTC believes the aim of this goal could be strengthened with the identification and proactive stewardship of these areas to set the foundation for such an ambitious, and much appreciated, goal. Timber management and road construction can change an area for decades, and the increase of human activity related to these activities can forever alter the ecosystem and existing plant and wildlife populations. These activities would significantly alter the ability of the Forest Service to identify future routes of the CDNST that provide for the high-quality experience that fit the nature and purposes of the CDNST. Identifying high-potential routes and locating the CDNST to an area that meets the nature and purposes of the trail is a requirement of the National Trails System Act, as integrated under the requirements set forth in the National Forest Management Act.

So in recognition of the need to relocate the CDNST off of roads and ensure the intent of the CDNST Comprehensive Plan direction is met, CDTC encourages the use of the CDNST Optimal Location Review Process (attached) to identify high quality potential routes. These are just a few of the guiding principles included in finding an optimal location for the CDNST through the GMUG:

- It is the intention of Congress for the Continental Divide National Scenic Trail to be a primitive and challenging non-motorized trail traversing the Continental Divide from Canada to Mexico.
- New CDNST construction should link to existing non-motorized segments of trail, or a plan should be in place to address the motorized uses on either end in the near future in order to meet the intent of the CDNST as

a non-motorized trail.

- All agencies should plan and construct the CDNST to include the following characteristics:
- Built to a non-motorized standard [ndash] Fully accessible for foot and equestrian use.

Portions accessible for mountain bikes where appropriate and consistent with Unit Plan direction.

- Challenging [ndash] Requiring a need for self-reliance and backcountry skills.
- Located through the most primitive, diverse and undeveloped landscapes on or near the Continental Divide.
- Accesses or is routed near nationally significant scenic, historic, cultural and natural features.
- Allows for an opportunity to view dramatic or unique scenery.
- Allows for an opportunity to view wildlife.
- Provides appropriate access to water sources.
- Developed to the most simple, yet high quality standard.

Conclusion

As an organization with many connections in the surrounding communities and a dynamic working knowledge of the area, the CDTC is uniquely positioned to inform and assist as this project moves forward, and we look forward to providing any insight that could be productive for this discussion. If we can be of further assistance in aligning The Plan with the CDNST Comprehensive Plan and the National Trails System Act, we would readily provide our expertise. Particularly of use for future planning, could be the Scenic Inventory Assessment that should be released soon and add to the conservation science we have about the CDNST, in order to make the most well-informed decisions about the future of the trail.

We readily embrace the adaptive management practices demonstrated here, as is a foundation of the Planning Rule, and hope that such adaptive measures will be forward-looking enough to plan for a CDNST that is completely located on high-quality trails in the GMUG. In particular, we feel that the repeated emphasis on collaboration with partners and volunteers, tribes, landowners, recreation users, and other GMUG NF stakeholders can only improve management of the forest, and we offer our support wherever it is helpful, whether that be assisting in evaluation of potential CDNST reroutes, building new trail sections, or educating CDNST users about management activities occurring along the trail corridor.

We appreciate the opportunity to provide comments on the scoping of this proposed action. If you have any questions, please contact Luke Fisher, Trail Policy Program Manager, by phone at

(406) 272-6179 or by email at Lfisher@continentaldividetrail.org.

Sincerely,

Teresa Martinez Executive Director

Continental Divide Trail Coalition Golden, CO

cc:Brenda Yankoviak, USFS National Trails Lead, Rachel Franchina, CDNST Program Administrator and Tom Phillips, Chair CDTC Trail and Lands Committee