

**COMMENTS BY THE COLORADO TRAIL FOUNDATION  
to the October 2012  
U.S. FOREST SERVICE ENVIRONMENTAL ASSESSMENT  
Regarding the  
CONTINENTAL DIVIDE NATIONAL SCENIC TRAIL  
REROUTE FROM LUJAN TO LA GARITA WILDERNESS**



**December 14, 2012**

**INTRODUCTION**

The Colorado Trail Foundation (CTF), in partnership with the U.S. Forest Service (FS), manages and maintains The Colorado Trail (CT) from Denver to Durango to insure a high quality, backcountry experience. The CT is a very popular and unique long-distance, high altitude trail widely considered a Colorado treasure. It is very popular with hikers, equestrians and mountain bikers for both day trips and long distance travel. The CT is maintained by a dedicated group of volunteers – so far in 2012, 530 of them have provided 15,639 hours of volunteer work to keep the trail one of the best in the country. The vision for the CT is that it will be a non-motorized trail from end to end.

The CT coincides with the Continental Divide National Scenic Trail (CDNST) for 314 miles of our approximate 566 miles including the entire distance of the relocation proposed in the FS's October 2012 Environmental Assessment (EA). We act as managing partner and provide most of the trail construction and maintenance on the co-located trail including the segments of the proposed relocation. Note that our June 2012 "Challenge Cost Share Agreement Between the CTF and the USFS" (CCSA) states in part that the "CTF Shall...Accept the primary responsibility for the development, maintenance, continued improvement, and upkeep of The Colorado Trail" of which the before mentioned 314 miles are a part. We are grateful for the FS's consideration of and proposal for the relocation. It will allow the construction of new, sustainable tread and will greatly improve trail conditions and the trail experience by removing the CT/CDNST from motorized trails and from trail segments where the trail tread has been damaged beyond repair by motorized use. Note that we were a party with FS representatives to an on-the-ground survey of the existing and proposed reroute and have discussed the proposed reroute with the USFS staff on several occasions. Accordingly, the CTF very much looks forward to continuing our partnership with the FS on this new trail construction and invites detailed dialogue between us at your convenience.

The CTF takes this opportunity to reply to the EA by examining recent companion documents that pertain to similar CDNST matters. See the listing of Research Documents below. This has also assisted our understanding of the framework under which the CDNST operates.

As to the EA, we applaud its fine quality and thoughtfulness and are highly supportive of its direction in the main. However, we do have two concerns and comments as delineated below.

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## CONCERNS AND COMMENTS

### Mountain Biking

Our principal concern is that mountain bikes are not allowed on the reroute under Alternative 2 (Preferred Alternative). The CTF has long held that the CT is for the use of hikers, horsemen AND mountain bikers. This usage is recognized in the above CCSA and has long been accommodated by the FS. The CTF recognizes that mountain bikes are specifically excluded from wilderness areas. The land in this EA is not a part of a wilderness area. Since mountain biking has historically been allowed on the vast majority of the CT that is not in wilderness, we are concerned that this restriction in the EA would likely establish a new and very undesirable precedent.

The basis for the FS's view on this matter is delineated on Page 28 of the EA under the section "Mountain bikes affect trail tread." This section describes in three brief paragraphs two physical impacts on the tread (entrenchment and wash boarding) and the perceived social effects of encounters of mountain bikes with hikers and horseback riders. The CTF is of the opinion that some of these effects are negligible. Additionally the CTF readily accepts its responsibilities under the CCSA to maintain (including repair) the Trail including any effects from mountain biking. The EA concludes with the following-"In general terms, bicycle use on the CDNST is not consistent with the overall objectives for the CDNST."

Mountain biking is recognized as an approved use of the CDNST as presented in the FS's "The 2009 CDNST Comprehensive Plan", September 29, 2009. Under Section "IV. B. 5. b. (2) Policy states... Bicycle use may be allowed on the CDNST (16 U.S.C.1246(c)) if the use is consistent with the applicable land and resource management plan and will not substantially interfere with the nature and purposes of the CDNST." The CTF does not see in the EA a clear explanation of why the FS wishes to disallow mountain biking under this Policy. More pointedly, the statements on Page 28 of the EA seem to be general in nature and not necessarily particular to the area between Lujan Pass and the La Garita Wilderness.

The 31-mile proposed reroute is very remote (200-plus miles from Denver) and is situated in gentle, rolling terrain with no appeal of a continuous downhill ride. In fact, the 31 miles will likely not be used in its entirety since the logical exit point is approximately midway at Saguache Park Road since there is no exit at the La Garita Wilderness boundary. Additionally, the reroute will almost certainly have very low usage. William Appel, a volunteer trail angel who continuously surveyed usage from his camp at Lujan Pass stated "Last year (2011) I saw 317 hikers between 7/2/11 and 8/28/11 after uplifting the total by 15% to compensate for the fact that I was only on site until 5pm each day. I saw only 5 CDNST hikers during this time. I saw 61 mountain bikes, 4 llamas, 17 horses with riders and 41 dirt bikes." (See Page 22 of the EA.) Mr. Appel's survey period encompasses the bulk of the usage in this area. I have visited Mr. Appel several times in his camp and observed his recordkeeping and the CTF has conversed with Mr. Appel by telephone over the years therefore we can attest to his diligence in his survey. Given the above we cannot expect that mountain bike usage would dramatically increase in this area if the reroute were open to biking nor would we expect the low usage would cause negative impacts to the Trail.

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The EA in “Chapter 3: Affected Environment/Environmental Consequences” delineates in 81 pages of excellent analysis the effect of rerouting the trail. This analysis is accompanied by dozens of external studies supporting the analysis. However, no such external studies are cited relative to the affect of mountain bikes on trails. The CTF also notes that a companion EA, “CDNST Halfmoon Creek to Monarch Pass Relocation EA”, December 2005, takes a similar approach. “Chapter 2. Alternatives” of the December 2005 EA has a modest two-paragraph reference to mountain biking on pages 11 and 12 with conclusions similar to the above. Further, “Chapter 3. Affected Environment and Environmental Consequences” has only nominal references to mountain biking over its 107 pages with no apparent mountain biking studies listed in “Appendix A-References” over its 15 pages. Note that the CTF is anecdotally aware of external studies on the affect of mountain bikes on trails. Accordingly, the CTF respectfully urges the FS to examine such external studies in the context of this current EA. Or, if not available, then we would urge the FS to initiate such a study on this important matter.

The EA well describes the potential use of the new reroute for mountain bikes. Excerpts from Page 29 states “Addition of the new trail for mountain bike use would offer a challenging opportunity for mountain bike riders to use a single-track trail for long distances, instead of having to ride the series of connected roads that is now the route.” Further, “The roads making up the existing route are gravel and present some hazard to riders from traffic.” This is especially true if proposed logging in the area utilizes the present motorized trail in the future. The EA in this section concludes with a mitigating option of not using the reroute but leaving open the current motorized trail for mountain bikes. Clearly this is a distant second choice of the mountain biker.

In concluding this comment on mountain biking, the CTF requests the FS consider merging Alternatives 2 and 3 by allowing mountain bike use on the reroute with requisite trailhead improvements and facilities as outlined in Alternative 2.

### **Trail Building Method**

The CTF suggests that the FS consider using mechanized construction equipment in rerouting this trail. A trail machine could be used to 'rough out' the new tread. This would facilitate the ensuing hand work particularly considering the short, anticipated 2 year period in which to complete the endeavor and its remote location. For a more complete description of the expected trail building method, please see Page 3 of the EA.

Thank you for your consideration,



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Research Documents-

1. USFS-“EA CDNST Reroute Lujan to La Garita Wilderness”, October, 2012
2. USFS-“CDNST Comprehensive Plan and Directives”, September 28, 2009
3. Department of Agriculture, USFS, Federal Register-“CDNST Comprehensive Plan; FSM 2350”, October 5, 2009
4. USFS, “Challenge Cost Share Agreement Between the Colorado Trail Foundation and the USDA, Forest Service, Rocky Mountain Region”, June, 2012
5. USFS, Saguache Ranger District- Scoping notice letter, relocation of CDNST from Windy Peak to the La Garita Wilderness”, August 13, 2010
6. Colorado Trail Foundation, “Comments on the USFS Scoping Notice of August 13,2010, Regarding the Relocation of The Colorado Trail and CDNST from La Garita Wilderness to Windy Peak”, September 14, 2010
7. Department of Agriculture, USFS, Federal Register, “Notice-Proposed directives; request for comment”, June 12, 2007
8. Colorado Trail Foundation, “Comments by the CTF on the Directive for the Planning, Development and Management of the CDNST (Revisions to FSM 2350)”, re: 7. above, October 8, 2007
9. USFS-“CDNST Halfmoon Creek to Monarch Pass Relocation Environmental Assessment”, December, 2005
10. USFS-“Decision Notice and Finding of No Significant Impact”, re: 9. above, March, 2006



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