



The Colorado Trail Foundation

January, 2018

Rio Grande National Forest
Attn: Rio Grande Forest Plan Revision
1803 West Highway 160
Monte Vista, CO 81144
rgnfforestplan@fs.fed.us

Hello Rio Grande National Forest Planners,

The Colorado Trail Foundation is pleased to comment on your September, 2017 Draft Rio Grande National Forest Plan Revision (Plan) and companion Draft Environmental Impact Statement (DEIS). We applaud your effort in revising your 1996 Plan. This revision is a very necessary and an important component in your managing the great Rio Grande National Forest! And your Plan revision is thorough and well thought-congratulations on your work product to date. Our comments follow.

INTRODUCTION

The Colorado Trail Foundation (CTF), in partnership with the U.S. Forest Service (FS), builds and maintains the 567 mile Colorado Trail (CT) from Denver to Durango. Our FS relationships encompass 5 Forests and 11 Ranger Districts all within Colorado and Rocky Mountain Region 2 of the FS. Ninety nine plus percent of the CT is FS land managed under a long standing Challenge Cost Share Agreement. The CT is a very popular and unique long-distance, high altitude trail widely considered a Colorado treasure. The CT is maintained primarily by a dedicated group of volunteers-800 workers devoting 20,000 hours in 2017. Three full time employees are headquartered in Golden, Colorado along with our George Miller Field Operations Center in Poncha Springs, Colorado.

The CT is co-located with the Continental Divide National Scenic Trail (CDNST) for 314 miles and the CTF has the “primary responsibility for the development, maintenance, continued improvement, and upkeep” (re our Challenge Cost Share Agreement) for this expanse. Further, the CT meanders 134 miles along the Continental Divide through 3 Forests-Rio Grande NF, Grand Mesa Uncompahgre Gunnison NF and San Juan NF with one end point being Windy Peak in the east and the other being Elk Creek in the west. The two trails diverge at Elk Creek with the CDNST traveling south and east to New Mexico and the CT traveling west and south to Durango. The DEIS calculates that approximately 80 miles of the CT is in the Rio Grande Forest.

OVERALL COMMENT

The DEIS outlines 4 Alternatives to form the basis for the Plan. Alternative A is no change from the 1996 Plan which is not appropriate for the current, much changed environment. Further, Alternative C

is a very broad based approach to the Plan and does not contain enough specificity to guide the new Plan. The CTF cannot support Alternative A or C.

Instead, The CTF does support either Alternative B (the Preferred Alternative in the DEIS) or Alternative D. Both alternatives have substantial merit with Alternative B likely facilitating broader use and Alternative D supporting somewhat greater Forest protection. And, Alternative B follows a comprehensive management plan which encompasses the complex rule set of the CDNST-citations below. However, it does not specifically prescribe a CDNST Management Area as does Alternative D. Such a Management Area 4.23 as outlined in Alternative D would be helpful in the final Plan to specifically address this rule set.

All things considered, The CTF defers to the Forest Supervisor's judgment in his final Decision between Alternative B or D. We are particularly sensitive to the Forest Service slogan "Land of Many Uses" and all of its inherent duties and responsibilities to your many constituents in making your final Decision. As examples, The CTF cannot reasonably consider the judgments facing the Forest Supervisor in balancing firefighting and distressed timber management alongside wilderness designations and recreational uses.

PROPOSED WILDERNESS

Alternative B proposes 59,000 acres of additional wilderness for Congressional consideration. Wilderness provides added protections to these wondrous public lands, however, The CTF does not have a view on added wilderness in context with other needed uses in the Forest as a whole. Again, this is a judgment that should be left to the Forest Supervisor.

Moreover, Alternative D proposes 285,000 acres of additional wilderness. Most of this added wilderness compared to Alternative B occurs along the Continental Divide of which the CT is a part. Once again we do not have a view on this added wilderness for the same reasons as above.

However, we do note that no new wilderness is proposed along the approximate 31 mile stretch of the Continental Divide from Lujan Pass to the La Garita Wilderness. As background, a section of the CT/CDNST was proposed for re-route to the Continental Divide in 2012/2013, however, the final favorable Decision was withdrawn (not overturned) upon appeal in 2013. Presumably, this Decision could resurface given new facts such as the emergence of a Unit Plan (see below) for the Rio Grande Forest. We also note no such re-route could be entertained if it were proposed as wilderness which is not this case.

UNIT PLAN/CDNST MANAGEMENT AREA/MOUNTAIN BIKING/SUBSTANTIAL INTERFERENCE

The term "Unit Plan" is often mentioned by the Forest Service in general and by the CDNST rule set in particular, however, the term lacks a specific definition. This Forest Plan appears to us POSSIBLY be a Unit Plan. Alternatively, another project specific EIS OR an entirely different document might be a Unit Plan. The importance of this definition to this Plan is found in rules such as CDNST "FSM 2353.44.b 2. A CDNST unit plan must be developed for each administrative unit through which CDNST passes. ..." and "FSM 2353.44b 10. Bicycle use may be allowed on the CDNST (16 U.S.C. 1246(c)), using appropriate trail design standards, if the use consistent with applicable CDNST unit plan and will not substantially interfere with the nature and purposes of the CDNST (FSM 2353.42)." In sum, we encourage the FS et al to more specifically define the term "Unit Plan".

Bicycle trail construction should be a suitable activity to consider in the CDNST Management Area. The specifically defined 4.23 Management Area in Alternative D does not cite in Table 9 “Bicycle trail construction” as a “Suitable activity...” (the box is not checked). It is cited as a “Suitable activity...” in most Management Areas in Alternative’s A, B and C. Therefore, the Forest Supervisor might conclude from this exclusion that “Bicycle trail construction” is not a “Suitable activity” for a 4.23 Management Area because of it not meeting the beforementioned “substantial interference” test. Or perhaps its exclusion is an oversight in Table 9? No dialogue is present in the DEIS supporting this exclusion. Therefore, if the “Suitable activity” box was checked, then the above exclusionary dialogue would not be an impediment to biking in any future Decision on the beforementioned Lujan Pass to La Garita Wilderness re-route.

Further supposing that a CDNST 4.23 Management Area is prescribed in the final DEIS, then checking the box in Table 9, “Bicycle trail construction” as a “Suitable activity” could also be accompanied by a footnote such as that suggested by the September, 2016 document “Developing Forest Plan Direction for the Continental Divide Scenic Trail” as endorsed by the 4 Regional Foresters overseeing the CDNST. The suggested “Conditionally Suitable” footnote, line item “Mechanized transport on the CDT...”, on page 8 of the document would state “Only suitable when such use would not substantially interfere with the nature and purposes of the CDT (high quality, primitive hiking and horseback riding opportunities and the conservation of scenic, historic, natural and cultural resources of the trail corridor).” As a sidebar, this type of reference is embodied in numerous CDNST rules and not just those referring to biking. Further, we also encourage the FS to define the important term “Substantial Interference” which has not been so defined to date.

Finally, The CTF does not have a view on whether a formal CDNST 4.23 Management Area should be utilized. We recognize that a more informal mapped trail corridor as a Plan component with the same features as a 4.23 Management Area might be adequately descriptive yet provide the Forest Supervisor with more latitude on future Decisions. As an example, a more informal mapped trail corridor with appropriate CDNST components might avoid an additional EIS and a Forest Plan modification in the case of a trail re-route.

CONTINENTAL DIVIDE TRAIL COALITION (CDTC) COMMENTS

We are in receipt of the December 21, 2017 CDTC comments on the Plan and are generally supportive of them excepting our indifference between Alternative’s B and D and our “no view” on the two wilderness proposals. It is apparent that the CDTC comments were well researched and thought out. And we also applaud them for promoting the added protections afforded our co-located trails in the Rio Grande Forest.

The CTF most appreciates the opportunity to comment on this critical endeavor by the Rio Grande Forest and welcomes back your comments and questions.

Best wishes for a successful conclusion to your Plan!



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Research Documents:

September, 2017 Draft Rio Grande NF Plan Revision and Draft Environmental Impact Statement
2012 Forest Planning Rule
FSH 1909.12 Land Management Plan
1968 National Trails System Act as amended
2009 CDNST Comprehensive Plan
FSM 2353.4 Administration of National Scenic and National Historic Trails
September, 2016 Rocky Mountain Region letter-“Developing Forest Plan Direction for the
Continental Divide National Scenic Trail”
December, 2017 Continental Divide Trail Coalition letter-“CDTC Comments on Revision of Rio
Grande Forest Plan”
June, 2013 Final Decision Letter on Reroute Lujan to La Garita Wilderness and subsequent
September, 2013 Withdrawal of Decision advice
2012 Challenge Cost Share Agreement Between the US Forest Service and The Colorado Trail
Foundation

