

Grand Mesa, Uncompahgre and Gunnison National Forests
Attn: Plan Revision Team
2250 South Main Street
Delta, CO 81416

December 7, 2017

RE: Grand Mesa, Uncompahgre and Gunnison Forest Plan Revision #51806

Your comment has been received by our system on 12/7/2017; Your letter ID is **51806-2163-235**.

Planning Team:

These comments are specific to assessing the status of protecting the Continental Divide National Scenic Trail (CDNST) that passes through the Gunnison National Forest.

Designated areas are specific areas or features within the plan area that have been given a permanent designation to maintain its unique special character or purpose. The assessment should, in part, address the following guidance (FSH 1909.12 part 14):

1. Types, purposes, and locations of established designated areas within the plan area. The Responsible Official should use a map to identify these locations, unless the location of the designated area must remain confidential for resource protection.
2. Range of uses, management activities, or management restrictions associated with the established designated areas in the plan area.
3. Existing plans for the management of established designated areas within the plan area, such as comprehensive plans for national scenic or historic trails. The CDNST Comprehensive Plan relies on staged decisionmaking, so the assessment and need for change findings should address the direction and staged decisions that are found in the existing Forest Plan as amended.

The assessment should evaluate the degree to which current management direction is protecting the values for which each National Trail was designated, including protecting cultural landscapes, recreation settings, scenic integrity, and addressing the conservation purposes of each National Trail. The assessment will help guide the development of the revised plan following processes identified in FSH 1909.12 part 24.

For reference and for the planning record, I have attached the latest version of a CDNST Planning Handbook, which addresses many aspects of planning for this National Scenic Trail. The CDNST Planning Handbook will continue to be updated as needed on the NSTrail.org website. To assist with public review of the forthcoming NEPA proposed action, please post at the appropriate time geospatial data. Posted data for the proposed action should include the following geospatial information:

- Administrative Boundaries (FSH 1909.12 22.2)
- Land Ownership (FSH 1909.12 22.2)
- Designated Areas, including Recommended Wilderness, Wilderness Study Areas, Eligible Wild & Scenic Rivers, Inventoried Roadless Areas, and the extent of the CDNST management corridor/rights-of-way to be established (FSH 1909.12 22.2 and 24) 2
- Recreation Opportunity Spectrum Classes to be established – Summer and Winter (FSH 1909.12 22.2 and 23.23a)
- Scenic Integrity Objectives to be established (FSH 1909.12 22.2 and 23.23f)
- Lands that May be Suitable for Timber Production FSH 1909.12 Chapter 60)
- CDNST travel route as an independent data layer (FSH 1909.12 23.23i)
- NFS roads and trails with attribute data, including existing road maintenance levels and trail travel route fundamentals such as Designed Use, Managed Use, and Trail Class (FSH 1909.12 23.23i)

In general, I agree with the key issue discussion for the Continental Divide National Scenic Trail (CDNST) as found on pages 1, 11, and 46 of the designated area draft assessment report. I would have identified the specific statements that I support, but the review document is saved as a secure document that does not allow for the copying and pasting of text. (Please allow for the copying of text from published planning documents in the future.)

I encourage the Forest Supervisor to address the planning for the CDNST in collaboration with the Rio Grande Forest Supervisor where the CDNST corridor is shared. The attached map depicts a recommended CDNST National Trail Management Corridor across this shared boundary.

Looking ahead to next summer, please consider hosting a field trip in the Gunnison area to review any proposed revised Forest Plan direction in relation to SBEADMR timber sales and the CDNST management corridor. Possible review sites could include the proposed Sargents Mesa, Divide, or Millswitch Timber Sale areas—note: please add the CDNST travel route to the sale area maps.

The proposed 2018 timber sales degrade the CDNST corridor ROS setting and substantially interfere with the CDNST nature and purposes and should be modified. NTSA Section 7(c) states, “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... [E]fforts be made to avoid activities incompatible with the purposes for which such trails were established.” In any case, ensure that the proposed timber sales along the CDNST travel route are in compliance with the Forest Plan VRM direction (FP, page III-12 through III-15).

The year 2018 is the 50th Anniversary of the National Trails System Act and the 40th Anniversary of the establishment and designation of the Continental Divide National Scenic

Trail. Next summer would be a good time to reflect on past and current CDNST management practices and to contemplate appropriate forest plan direction for the future.

Thank you for considering these comments and I look forward to participating throughout the revision process.

/s/ *Greg Warren*

Greg Warren
NSTrail.org

Attachments:

- CDNST Planning Handbook (version 12.07.2017)
- CDNST National Trail Management Corridor Map