



**Continental Divide Trail Alliance**  
**Official Response to**  
**Forest Service Final Direction and 2009 Comprehensive Plan**  
**for the Continental Divide National Scenic Trail**

On October 2, 1968, Congress enacted the National Trails System Act (P.L. 90-543), which established a nationwide trail system, and designated the Appalachian Trail and Pacific Crest Trail. The Act describes that National Scenic Trails “will be extended trails so located as to provide for maximum outdoor recreation potential and for the conservation and enjoyment of the nationally significant scenic, historic, natural, or cultural qualities of the areas through which such trails may pass.” The Act also specifically directed the study of a Continental Divide Trail.

Forty-one years later, on October 5, 2009, the Federal Register Notice of Final Amendments to the Comprehensive Plan and Final Directives for the Continental Divide National Scenic Trail (CDNST) were released.

As the leading non-governmental partner in the completion, maintenance and protection of the CDNST, the Continental Divide Trail Alliance (CDTA) is pleased with the finalization of the public process to help strengthen and solidify consistent management direction for the CDNST; and CDTA feels this will provide the much needed clarified direction for future management of the CDNST, more adequately support our land management partners as they move forward towards completion of the CDNST, and more formally engage the entire American Public in helping fulfill the vision Congress had for the creation of National Scenic Trails. CDTA commends and recognizes the diligence of its USFS partners toward the finalization and completion of this important process and its engagement of the American Public.

**Purpose of the New Direction for management of the CDNST**

In 2007, the US Forest Service, the leading federal agency for the completion of the CDNST, requested input to clarify, amend and revise the official federal documents that provide direction on the how the CDNST should be completed and managed. These documents included the CDNST Comprehensive Plan and the USDA Forest Service Manual 2300, chapter 50. These documents were created utilizing the language from the National Trails System Act (NTSA) as amended in 1978 to include the CDNST, and the CDNST Study Report.

**Summary of CDTA’s Comments to 2007 Federal Register Notice: Proposed Directive for the Management of the Continental Divide National Scenic Trail**

During the 2007 public process to review the proposed changes to CDNST Management Direction, CDTA provided the following recommendations for the issues we believed were of highest priority for the CDNST.

1. CDTA recommends the following nature and purpose statement: “The nature and purposes of the Continental Divide National Scenic Trail are to provide for high quality, scenic, primitive non-motorized recreational experiences, primarily for the hiker and horseman, and to conserve the nationally significant natural, scenic, historic and cultural resources along the Continental Divide.”

2. CDTA does not support the location of the CDNST on roads or trails open to motorized use. CDTA believes that these motorized uses do substantially interfere with the nature and purpose of the CDNST. When the CDNST was designated, it was not the intent for this Trail to be open to motorized “recreational” use. The intent was to allow limited motorized use only for administrative purposes such as emergencies and private land access. CDTA plans to work with motorized organizations to find appropriate and fair solutions to create a continuous non-motorized CDNST.
3. CDTA believes mountain bike use is one new non-motorized use that should have qualified access to the Continental Divide Trail outside of Wilderness and National Parks under certain restrictive guidelines whereby both physical and visual impacts would be kept at a minimum and the Trail’s primitive and aesthetic values are protected. CDTA recognizes that a foremost concern of managing the Trail must be the immediate personal safety of all users, and all users will be expected to always share in that responsibility.
4. CDTA recommends that non-motorized uses, other than hiking and horseback riding, may be allowed on the CDNST when such uses do not substantially interfere with the nature and purposes of the CDNST, *and* if those uses are allowed in the overall management direction (Forest Plans, etc.). New non-motorized uses should be considered on a case by case basis depending on levels of use (carrying capacity), types of use, safety of all users of the trail section, topography and soils of the area, impacts on the physical and biological environments, and the impacts on the nature and purpose of the CDNST.
5. CDTA recommends the CDNST travel through Wilderness as much as possible. Hiking and horseback riding are traditional and important uses of Wilderness and CDTA believes the nature and purpose of the CDNST is consistent with the Wilderness Act. CDTA also believes it is appropriate to construct new trails in Wilderness to achieve the desired goals of the CDNST.
6. CDTA recommends that the CDNST should be located on permanent easements (not temporary or short-term easements) to prevent the loss of established trail segments and more effectively to utilize scarce resources.
7. CDTA recommends that a “congressionally designated area” or “special area” along the Continental Divide Trail route, as described in the Study Report, should be incorporated into land management planning to protect and manage critical Trail values and experiences while being sensitive to other public lands users.
8. CDTA recommends that CDNST management and monitoring guidelines be established to protect the significant experiences and features that exist along the CDNST and to establish the best location for a non-motorized CDNST through the most primitive, scenic, diverse and undeveloped landscapes on or near the Continental Divide that will provide a wide range of experiences and challenges.
9. CDTA recommends the CDNST travel through landscapes managed for “primitive” and “semi-primitive” experiences of Very High or High scenic qualities.

### **CDTA’s Response to the Federal Register Notice of Final Amendments to Comprehensive Plan and Final Directives for the Continental Divide National Scenic Trail, Published October 2, 2009**

CDTA has long recommended that the Comprehensive Plan needed amendment to provide clarity on where the CDNST should be located, what sort of landscapes, trail characteristics and human experiences should be expected and what uses could be allowed along the Trail. CDTA also felt that the 1985 Comprehensive Plan did not recognize that the CDNST was more than a tread 18-24 inches wide, but rather an Experience made up of the environs surrounding the pathway. In addition, some recreational uses were not in existence when the CDNST was designated in 1978 and it was felt that the Comprehensive plan should include a section on new non-motorized uses and to provide direction and process as to how to determine whether these uses were appropriate. Finally, when the 1985

Comprehensive Plan was created, the language and intention for the CDNST, as described in the National Trails System Act and CDNST Study Report, was not clearly defined and allowed for a wide range of interpretation, ultimately resulting in inconsistent, and often confusing management of the CDNST from Canada to Mexico.

CDTA supports the new direction to be included in the amended Comprehensive Plan for management of the CDNST. CDTA feels this new direction will provide a more consistent framework for making decisions about the management and uses allowed on the CDNST, trail wide. Specifically, with regard to the Final Amendments to the CDNST Comprehensive plan:

1. **Nature and Purposes:** CDTA supports the clarification of the nature and purpose statement for the CDNST and that the amended Comprehensive Plan is more consistent with direction both in the National Trails System Act, the CDNST Study Report and Final EIS for the CDNST.
2. **Acquisition of Non-Federal Interests in Land:** CDTA supports the direction included in the amended plan to allow for willing seller purchase of lands or interest in lands for the CDNST.
3. **Visual Resource Management:** CDTA supports the classification of the CDNST as a concern level 1 route with a scenic integrity objective as high or very high.
4. **Recreation Resource Management:** CDTA supports the direction to utilize a localized public process to determine areas of the CDNST that may be used by other new non-motorized uses, and that these uses are monitored to ensure that they remain consistent with the nature and purposes statement for the CDNST. Furthermore, CDTA supports the use of the Recreation Opportunity Spectrum (ROS) in delineating and integrating recreation opportunities in managing the CDNST and CDTA supports the clarification that the CDNST should be located in primitive or semi-primitive non-motorized areas.
5. **Motor Vehicle Use:** CDTA supports the clarification that the CDNST is intended to be a non-motorized trail from Mexico to Canada, but also that it provides for more consistent direction as to how, when and where existing motorized use may occur to provide for a continuous route from Mexico to Canada.
6. **Trail and Facility Standards:** CDTA supports the clarification of the designed use for new segments of the CDNST to be for Pack and Saddle Stock and Hiker/Pedestrian.
7. **Carrying Capacity:** CDTA supports the inclusion of the use of the Limits of Acceptable Change system to help determine carrying capacity for the CDNST.
8. **Inconsistencies:** CDTA supports the utilization of the 2009 Comprehensive Plan for management of the CDNST where inconsistencies exist between the 1985 and 2009 Plans.