



710 10th Street, Suite 200
Golden, CO 80401

December 14, 2021

Project Review Team
PO Box 620
Silverthorne, CO, 80498

Re: Scoping Proposed Action for the Swan Mountain Project

To Whom It May Concern:

Representing approximately 2,000 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. The 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 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.

CDTC supports and encourages the continued efforts on the part of the Forest Service to proactively manage wildfire risks to humans and habitat in an era with an increasingly extended and impactful fire season. As the effects of climate change further exacerbates the extreme conditions that make preparation and avoidance of dangers related to fire so difficult, the safety and experience of CDNST travelers and the surrounding communities continues to be an utmost priority. For that reason, we applaud this effort to create a plan to reduce the risk of historically uncharacteristic wildfire, increase resiliency against future

stressors, and improve the proper ecological function of these spaces. As the Forest Service moves forward with this project, the CDTC has identified numerous priorities to ensure this project aligns with the standards set out in the management plan authored by the Forest Service for the protection and maintenance of the Continental Divide Scenic Trail.

Within the area designated for scoping of this fire restoration project, there are at least 656 acres of land prescribed for treatment within 250 feet of that trail that fall within the CDNST Management Area and corresponding corridor. Along with the trail itself, the National Trails System Act allocates a corridor that contains public land area of sufficient width within to encompass National Trail resources, qualities, values, and associated settings and the primary use or uses that are present or to be restored to provide for the nature and purposes of the CDNST (National Trails System Act, Section 7(a)(2). Oct. 1968. Sec 9(a) [16USC1248]). US Forest Service policy further defines the CDNST Management Area and details that corridors must be administered to be compatible with the nature and purposes of the Trail (FSM 2353; 42, 44(b) parts 7 and 8; FSM 2380). The nature and purpose of the trail, summarily, is to provide an appealing, primitive trail route for hikers and horseman, and, to, “provide hiking and horseback 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.” (CDNST Comprehensive Plan 2009, Nature and Purpose Description, page 3) As such, the corridor for the CDNST as defined by the Forest Service must consist of and consider in its plans, the one-half mile foreground viewable from either side of the CDNST treadway (FSM 2353.44b(7)).

In order to ascertain the potential impacts of this project, if the project area is within 4 miles of the trail, all project proposals and scoping maps should delineate the Continental Divide National Scenic Trail as well as the one-half mile corridor that is contained within the CDNST Management area. This is essential, particularly when undergoing public review, to fully understand the impact to traveler experience as well as impacts to the wildlife and vegetation surrounding the Trail. Within this corridor, we urge the Forest Service to adhere to the guidelines in the Scenery Management System in order to maintain a scenic integrity objective of high or very high, depending on the trail segment (FSM 2382.1, *Landscape Aesthetics: A Handbook for Scenery Management*, Agricultural Handbook 701, 1995, <http://www.fs.fed.us/cdt>). As a Concern Level 1 route (*Landscape Aesthetics*, page 4-8), the protection and conservation of the scenic integrity of this corridor and the viewable foreground, and, where feasible, middle ground and background, must be a top priority in order to ensure that travelers on the trail have the intended experience as set forth in the 2009 Continental Divide National Scenic Trail Comprehensive Plan.

Detailed in the CDNST Vegetation Best Practices, a collaborative effort in tandem with the U.S Forest Service, there are a number of guidelines that specify techniques to be used to ensure that as a Concern Level 1 route, the CDNST foreground reaches the threshold for a scenic integrity objective of high or very high. The large area of the project that will have an impact on the CDNST necessitates taking into consideration the variation in techniques that should be implemented to maintain the intended trail experience. As a naturally occurring ecological process, viewing evidence of fire from the trail is expected. However, specifically for prescribed fires, the guidelines indicate that low intensity prescribed fire is the preferred method of fuels treatment and forest regeneration. Fire scarring on tree trunks is acceptable, but avoiding scorching of the tree canopy is a top priority. Fire lines within 300 feet

must also be restored following burn operations, and all mechanized or hand treatments should be minimized within 300 feet of the trail as well. The CDT should not be used as a temporary road or as a route for skidding, and skid trails should be minimized across the route, those that are perpendicular are preferred to skid trails running parallel to the trail.

Lastly, we support and urge the Forest Service to conduct a thorough NEPA review of sites designated for prescribed fire in order to ensure public participation and that all environmental factors have been considered in regards to forest and wildlife health. The implementation of this plan could potentially impact the preparation and planning for CDNST travelers who use the trail year round. We urge a proactive public review and transparency in this process to allow input from communities who depend on these public lands for tourism and recreation as well as the trail users that could feel the effects of this prescribed restoration. Similarly, we urge careful consideration of wildlife corridors and habitat fragmentation that could have unintended consequences for sensitive wildlife such as grizzly bears, elk, and the greater sage grouse all of which contribute to the natural outdoor wonder that is expected on the CDNST. Further questions to consider regarding CDNST traveler experience include:

- **How will the proposed action and alternatives impact the scenic character? Discuss both short-term and long-term effects. Consider effects to scenic character for projects implemented within foreground and middle ground views from the trail.**
- **How long will the impacts change the experience for trail users?**
- **Will popular camping sites be disrupted or lost for extended periods of time?**
- **Cumulative effects, how many similar projects will long-distance trail users encounter in your area? Likewise, how many similar projects have occurred on your unit that may affect scenic character within foreground, middle ground and background views from the trail?**

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.

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,



Luke Fisher
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Continental Divide Trail Coalition
Golden, CO

cc: Rachel Franchina, CDNST Program Administrator and Tom Phillips, CDTC Trail and Lands Committee Chair