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RE: Draft Environmental Assessment for the Swan Mountain Project

Dear District Ranger Adam Bianchi,

Thank you for the opportunity to provide comments regarding the **Swan Mountain Project**. We are happy to assist you with this process and help you strive for the highest quality outcome possible, especially as it relates to the **Continental Divide National Scenic Trail (CDNST)** within the White River National Forest. The EA does a good job of noting the special management requirements for the CDNST's scenic character while also proposing a .6 mile re-route of the co-located CDNST/Colorado Trail that has the potential to improve the on-trail experience. Future planning considerations regarding temporary stoppages along the trail during the vegetation management process and forest rehabilitation efforts after the project is completed, such as temporary road decommissioning, will be a priority going forward.

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. The 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 20 National Forests, 21 Wilderness areas, 3 National Parks, 2 National Monuments, 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 five states 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.

## Background

The CDNST is far more than a path on the ground; rather, it is the sum of the myriad scenic, natural, cultural, and historical qualities of the areas surrounding the trail that make a journey along the CDNST unique and spectacular. The CDNST is protected and maintained not only for the physical trail itself, but more importantly, for the experience it provides. The United States Congress designated the Continental Divide National Scenic Trail by an Act of Congress in 1978. The *Continental Divide National Scenic Trail Comprehensive Management Plan* was approved by the U.S. Forest Service and set forth as policy in 2009. This overarching policy direction serves to implement Congress's direction in the National Trails System Act, and is an essential tool for guiding decisions regarding Forest Plan direction for the CDNST. The Comprehensive Plan also incorporates FSM 2353.42 and 2353.44b.

## Background Materials

CDTC has provided the following additional materials with our proposal Comments below:

1. CDNST Experience Statement

### Current CDNST Route in the Swan Mountain Project Area

CDTC appreciates the attention given to the CDNST in this EA, and are encouraged by the guidelines included below that will help to improve forest health and provide for a more naturally occurring experience for trail travelers. The following guidance included in the plan is helpful in achieving these management goals.

As the plan notes:

*“The CDNST traverses through the Swan River, Soda Creek and Swan Mountain zones of the project area and is managed for high quality scenic character and recreational experiences as well as to highlight multiple historic, cultural, and natural resource uses. This is a popular and high use recreation trail with nearby trailheads receiving over 2800 visitors per month (Sillars 2021). In response to the mountain pine beetle epidemic, previous hazard tree removal treatments were implemented along the trail between 2010 and 2012. These treatments were designed to improve safety for CDNST users by felling hazard trees within striking distance of the trail. Consequentially, these treatments resulted in a large quantity of down trees adjacent to the trail, creating an unnatural appearance that continues to reduce the scenic quality and the overall user experience.”*

The plan then proposes:

*“Vegetation Management and scenic integrity treatments on approximately 656 acres within 250 feet of the CDNST. Approximately 12.5 miles of trail may be treated. This work would use mechanized equipment, hand treatments, pile burning or a combination of these methods. Treatments would occur along the portions of the trail that have heaviest accumulation of dead and down trees, not along the entire length... Fuels*

*accumulations would be reduced to 5-15 tons per acre to meet forest standards. This work would be designed to improve the scenic integrity of the trail by creating a more natural appearance along the trail.”*

The draft EA also proposes a realignment .6 realignment of the Colorado Trail #1776 (i.e. the CDNST) due to drainage and trail erosion issues. Based on the current conditions along this section, CDTC applauds this efforts and agrees that there is a need to improve the user experience by reducing concentrations of tree downfall and improving the scenic integrity in some areas adjacent to the CDNST.

**In consideration of these additional materials and upon review of the Swan Mountain Project proposal, we offer the following comments and recommendations:**

CDTC appreciates the intent of this plan to improve the scenic character and recreation experience in the area by managing some issues created by previous tree cuttings while also improving resilience to wildfire in this region. We support the mitigation of these compounding variables in the face of the growing climate crisis that increasingly threatens forest health and habitat vitality, as well as the health and safety of trail travelers and communities. Without such proactive stewardship efforts on the part of land management agencies, the threat of more extreme wildfire and the potential expansion of insect infestations would potentially lead to more extreme conditions that would have an extremely negative impact to the region. We also greatly appreciate the consideration of the nature and purposes of the CDNST that is referenced throughout this plan, as it models an analysis framework that all land management agencies should engage in regarding National Trails units in forest planning and allows greater evaluation during public review. However, CDTC still wants to consider the short- and long-term impacts to the trail through the creation of temporary roads and other vegetation management practices, such as temporary stoppages for trail users.

**Specific Vegetation Management practices:**

*“The CDNST unit prescription would only remove dead and down trees within a 250-foot buffer on each side of the trail using the pile and burn method. All healthy forest vegetation would remain in place but damaged, diseased or insect infested trees may be cut to help improve the visuals. Although the Forest Plan has applied SIOs evenly across the entire forest and project area, the Forest Plan has also applied a special site-specific SIO of High to a 0.5-mile corridor on each side of the trail. This SIO is a higher-level SIO than most of the project area outside of this corridor. Previous emergency hazard tree cutting that occurred along this trail has left the scenic character of the trail degraded and has reduced the recreational experience and safety of the trail. The negative impacts to the trail within the High SIO would only occur in the short term while cutting, piling, and burning activities would take place. Healthy trees remaining within the 250-foot buffer on each side of the trail would help to screen views into other more visually impacted treatment units. After project activities are completed, the visual impacts would be beneficial in moving the Existing Scenic Integrity back into the High designation and would result in compliance of the High SIO within the 250-foot buffer in the long term... Cut stumps should be 6 inches or less, hand piles will be at least 30 feet*

*from the CDNST, burning of completed hand piles in the CDNST unit will be prioritized over other hand piles within the project area. Burning will be dependent on favorable burning conditions. Rehabilitate hand pile burn scars by raking in soil from surroundings and dispersing unconsumed fuels.”*

CDTC also understands the concerns about an increased risk of crown fires with the no action alternative and realizes that some type of vegetation management may be needed. **We appreciate the inclusion of the SIO of very high or high and encourage adherence whenever conditions align with forest health goals in the scope of this project**, but understand that short-term alterations can lead to overall improvement of the CDT experience in the long-term.

Recreation and Scenic Improvements: “*The CDNST runs through the project area and proposed project activities include mitigating the dead and down fuels along the trail corridor. It is expected that by removing previously felled trees and reducing dead standing and down timber along the trail, the visitor experience and viewshed would be improved. For instance, a more open, park-like landscape would offer additional camping opportunities currently obstructed by concentrations of down trees, visitor safety would improve due to fewer dead standing trees that could fall on the trail and impact visitors, and foreground to middle ground viewsheds would be enhanced.”*

CDTC supports these efforts to better align this 13.5 mile section of the CDNST with the nature and purposes of the trail’s designation, while treatment would also support overall forest health. CDTC appreciates the proactive efforts and evaluation of the cumulative impacts to the CDT experience in both the short- and long-term.

Project Mapping and CDNST Awareness: For future proposals and agency action, it would be most helpful for public review if the CDNST was specifically delineated in agency materials concerning any proposed action. On the current PDF map available online, it is challenging to see the specific re-route of the CDT/Colorado Trail due to the color scheme and crowded display. In order to fully identify all the impacts to the Trail from this proposed action and to support informed public participation, the trail and the trail corridor should be reflected distinctly on all project maps utilizing the appropriate legend and color scheme. (The CDNST is viewable via the [digital interactive map](#).) We respectfully request that you include the CDNST and its corridor in all future project maps and information if the CDSNT is within the area of the proposed action while noting where the CDNST is co-located with other trails such as the Colorado Trail. Additionally, CDTC would like to support the Forest Service with any potential changes to maps and signage in the area as well as the utilization of digital platforms such as [Colorado Trail Explorer](#) (COTREX) and FarOut guides in helping notify the public of updates.

Safety Considerations: Lastly, the safety of CDNST travelers is also the top priority for CDTC, and for this reason, the potential for impact to trail travel is of concern. Many trail travelers plan weeks, months, and even years in advance, and require the most up-to-date information to ensure that preparation for their time on the CDT is informed, safe, and enjoyable. As the project moves forward, we urge project managers to account for increased trail travel disturbances for travelers due to project activity by providing advance notice of any activity that could impact trail traveler’s experience. CDTC recommends the use of platforms like COTREX and appropriate

social media networks when adding alerts or temporary closures. CDTC is also happy to amplify notices within our communication networks to make sure travelers on this section of trail are prepared for activities related to this project.

## Conclusion

CDTC is thankful for the opportunity to comment on the Swan Mountain Project. By taking the CDNST into consideration when preparing for vegetation management and recreational trail improvements, CDTC believes that this proposal has the ability to improve the scenic experience for many people while also improving the ecological vitality of the White River National Forest. Going forward, as an organization with connections in the community and an expertise on CDNST policy guidance, CDTC welcomes consultation on any decision that could impact the trail. Furthermore, the CDTC is eager to share our resources (volunteer scouts, membership relations, fundraising abilities, volunteer labor, etc.) to work with the White River National Forest to determine the optimal conditions for the CDNST corridor through the area and assist in its implementation.

We thank you for the opportunity to comment and participate in the management and protection of the CDNST. We look forward to working with the regional USFS staff and ensuring the CDNST remains a high-quality recreational resource across the White River National Forest. If you have any questions, please contact Jordan Williams, Colorado Conservation Fellow, by phone at (360) 244-9249 or by email at [Jwilliams@continentaldividetrail.org](mailto:Jwilliams@continentaldividetrail.org).

Sincerely,



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Continental Divide Trail Coalition

cc: Ben Lara, CDNST Program Administrator