



**CONTINENTAL DIVIDE
TRAIL COALITION**

710 10th Street, Suite 200
Golden, CO 80401

May 15, 2023

Adam Bianchi
c/o Katheen Gray
P.O. Box 620
Silverthorne, CO 80498
(970) 468-5400

RE: Scoping for the Frisco Backyard Fuels and Recreation Project

Dear District Ranger Adam Bianchi,

Thank you for the opportunity to provide scoping comments regarding the **Frisco Backyard Fuels and Recreation 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 and the newly designated Camp Hale–Continental Divide National Monument (CHCDNM). This preliminary scoping notice deals with several areas that intersect with CDNST management practices including fuels treatments, sustainable trail systems, management support through the Town of Frisco, and integration with the CHCDNM proclamation. Therefore, we look forward to continued engagement on this project.

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.

Current CDNST Route in the Frisco Backyard Fuels and Recreation Project

The overall fuels treatment area involves 1,233 acres within 11 different units. Fuel Treatment Unit #3, which includes 250 total acres, contains approximately one mile of the CDNST and the co-located Colorado Trail (CT). Unit #1 (47 acres) appears to be directly within the viewshed of CDNST trail users as well.

The recreational component of the plan involves up to 25 miles of trail projects as well as decommissioning non-system trails where appropriate and adding other opportunities. Based on the scoping documents, there does not appear to be any proposed changes to the current CDNST/CT route, but there are two non-system routes that intersect with the CDNST according to the scoping map.

In consideration of the Frisco Backyard Fuels and Recreation Project scoping notice, we offer the following comments and recommendations:

CDTC appreciates the intent of this plan to create a more sustainable trail system based on the community's needs while also reducing the potential for high intensity wildfires near local population centers. 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 degradation of recreation areas would potentially lead to more extreme conditions that would have an extremely negative impact to the region. However, as we appreciate this proactive management plan, CDTC does not want to downplay the potential short- and long-term impacts to the trail through the creation of temporary roads and other fuel treatment methods.

The scoping notice says that no permanent roads will be constructed; however, temporary roads, skid trails, and landing decks may be necessary to provide access for equipment and staging of

material. How long will these temporary impacts linger within the natural ecosystems? And how can impacts to the protected CDNST corridor be mitigated? As detailed in the [CDNST Comprehensive Plan](#), the CDNST has a scenic inventory objective (SIO) of high or very high, which can help be achieved through the CDT Vegetation Treatments recommended in the [USFS Management Toolbox](#) to assist in ensuring that the proposed projects and impacts do not substantially interfere with the nature and purposes of the CDNST.

Specific Fuel Treatments: Based on the fuel treatment table in the scoping notice, most treatment units will include hand and mechanical methods. Unit #1 containing 47 acres within the CDNST's direct viewshed could include methods such as clearcut, clearcut with leave tree, patch clearcut, group selection, overstory removal, and salvage of dead trees. Unit #3, which includes approximately one mile of the CDNST, involves the same treatment methods but specifies that only hand treatments will be considered. It appears like hand treatments only along Unit #3 within the CDNST corridor will help mitigate long-term and short-term disturbances to the trail experience.

Recreation Management: The plan states, *"The existing trail system is complex and composed of numerous high-use trails and destinations and multiple user groups. As a result, this proposal includes changes to both the physical trail system and managed use to minimize conflicts between user groups on these high-use trails. Physical changes to the trail system within the analysis area would include constructing new, improving existing, or closing and restoring certain trail segments, as well as installing wayfinding signage. Changes to the managed use include designating some trails for directional use (i.e., uphill/downhill); for alternating use (i.e., even/odd or weekend only restrictions); for specific uses only (i.e., hike/bike); or for additional uses that aren't currently permitted (i.e., winter biking). Unauthorized route segments within the analysis area may either be adopted as NFS trails and maintained into the future or decommissioned and restored."*

The scoping notice requests substantive comments containing information regarding specific trail segments, but there appear to be no recommended changes to the CDNST in the analysis area, which includes trails #38 (Miner's Creek) and #79 (Gold Hill). However, unauthorized non-system routes #14 and #2 do connect to the CDNST/CT, thereby creating additional loop opportunities for recreationists. Based on Appendix A (Summary of Preliminary Proposed Trail Actions), these non-system routes will be considered for construction, maintenance, and/or decommission. Route #2 would potentially include uses such as hiking, packing, skiing, and snowshoeing in a bi-directional format. Route #14 would include the same uses but also allow non-motorized bicycling between 5/21-11/22 annually. While non-motorized bicycles are allowed on this section of the CDNST/CT (Trails #38 and #79), this differentiation in proposed uses between the two connector routes (#2 and #14) seems confusing. CDTC would like to see consistent management practices with any connector trails since the CDNST/CT is already accessible in this area from the north via Miners Creek Road and Trail #45 (Peaks Trail). Consultation with CDTC staff and the Colorado Trail Foundation would be recommended as part of this recreation management plan.

In regards to the Town of Frisco's special use authorization for continued maintenance of trails within the Rainbow Lake recreation area, CDTC supports collaborative stewardship efforts that

improve the visitor experience. However, CDTC would request direct consultation with the Town of Frisco regarding any future changes to the CDNST corridor if their permit were to include Miner's Creek and Gold Hill Trails as well within the CHCDNM boundaries.

Project Mapping and CDNST Awareness: CDTC appreciates the inclusion of the CHCDNM proclamation language and boundaries on the scoping map. However, one of the biggest issues with the scoping notice from CDTC's perspective is that the CDNST/CT is not marked or noted in the scoping documentation. Instead, it is referred to as the Gold Hill and Miner's Creek Trails, which makes it very difficult to ascertain impacts to the trail corridor in conjunction with the Fuel Treatment Areas and Proposed Trail Improvements. Also, the signed Scoping Notice posted on the website downloads as an image rather than a document PDF. This makes searching through the document challenging for the general public without access to more advanced Adobe Acrobat products.

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. 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 correctly on all project maps. (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](#) and FarOut guides in helping notify the public of updates.

Conclusion – General Scoping Comments

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 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? Are there safety or access concerns during the execution of this project?
- 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? (e.g., Swan Mountain) 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?

CDTC is thankful for the opportunity to comment on the Frisco Backyard Fuels and Recreation Project. 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.

Sincerely,



L. Fisher
Trail Policy Program Manager
Continental Divide Trail Coalition

cc: Ben Lara, CDNST Program Administrator; Sharon Buccino, Chair - CDTC Trails and Lands Committee