



**CONTINENTAL DIVIDE
TRAIL COALITION**

710 10th Street, Suite 200
Golden, CO 80401

May 5, 2025

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

RE: Comments on Town of Frisco Backyard Fuels and Recreation Project

Dear District Ranger Adam Bianchi,

Thank you for the opportunity to provide 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 Camp Hale–Continental Divide National Monument (CHCDNM). This Draft Environmental Assessment deals with several areas that intersect with CDNST management practices including fuels/vegetation treatments, scenic values, and recreational infrastructure. 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:

According to the Draft EA, "Approximately 1-mile of the CT/CDNST traverses the project area. The Colorado Trail was first constructed between 1986 and 1987 before being incorporated into the larger Continental Divide National Scenic Trail network. The portion of the CT/CDNST within the project area is strictly nonmotorized and open to multiple uses including travel by foot, horse, and bicycle. Visitors include day hikers as well as section and through-hikers, and approximately 23,984 users were estimated to use the portion of the CT/CDNST within the project area in 2022 (USDA Forest Service 2022b)."

While only 1 mile of the CDNST is within the project boundary, and the EA states that the project will be designed to mitigate adverse effects on the trail, the viewshed for up to 8 miles of the trail could be impacted based on the scenic values associated with the entire 3,026 acre project area. Based on the CDNST-USFS viewshed analysis tool, about 10% of the project area is within the foreground viewshed of the CDNST (within 0-5 miles of the trail), and another $\frac{2}{3}$ of the project area falls within the middle/background viewshed (5-40 miles, depending on topography).

In consideration of the Frisco Backyard Fuels and Recreation Project Draft Environmental Assessment, 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, while we appreciate this proactive management plan, CDTC is concerned with the creation of temporary roads and potential for damages to the surrounding ecosystem, how the project will support high scenic inventory objectives for the CDT in an area with already compromised scenic values to the east, and the cumulative impacts on the recreational trail user experience when considered alongside other projects in the area such as Swan Mountain Vegetation Management work across Highway 9.

As detailed in the [CDNST Comprehensive Plan](#), the CDNST has a scenic inventory objective (SIO) of high or very high for the foreground of the trail, which can best be achieved through utilizing the [CDT Vegetation Treatments - Best Practices](#) document, which provides recommendations for ensuring that the proposed projects and impacts do not substantially interfere with the nature and purposes of the CDNST.

Scenery Impacts: The Draft EA notes that "recreation improvements are not expected to have notable long term adverse impacts on the scenic values in the area... Following implementation of these projects and revegetation of impacted areas, the disturbed areas would conform to the designated SIOs. Although the scenic experience of trail users and recreators may be adversely impacted in the short term as the sights and sounds of construction occur and until revegetation is completed, the long-term beneficial effects would outweigh these short-term adverse impacts."

While thinning and removal of dead and dying trees open up viewsheds along the trail and have the potential to improve safety and forest health, these treatments may degrade the scenic and primitive character of the trail by introducing clear evidence of human impact on the landscape, Potential impacts to the scenic quality of the CDNST from the actions proposed in the EA include:

- Fuel treatments will not only alter foreground views from the trail, but also the surrounding landscape. To reduce effects to scenery, fuel treatment prescriptions assigned to units immediately adjacent to the CDT should be limited to dead only. The beneficial effects of this approach include a reduction in the proportion of gray trees, as well as fewer horizontal and oblique lines attributable to the dead standing, leaning, and downed trees.
- For treatments within the CDT corridor but not directly adjacent to the trail, changes to the landscape may be evident where topography, existing natural openings, and created openings allow trail users to view beyond the dead only units. Most noticeable to the frequent visitor and local residents, these treatments would appear more natural in the long term as the area revegetates. Project design-specific criteria have been included to require feathering and irregular patch cut borders.
- SIO of high would not be met in the short term due to the presence of piles altering the form of the area as well as the creation of large openings. Over the long term, SIO high could be achieved.

Recreation Experience: The plan does not propose any changes to the physical trail tread of the CDNST or Colorado Trail, but with the addition of Trails 8 and 14 to the official system as well as winter use trail system changes and grooming practices, CDTC would like to avoid any motorized impacts along trail crossings and parallel roads. New construction of Trails 61 and 46

near the CDNST has the potential to invite additional visual and auditory intrusions into the trail experience if not carefully designed and screened. Managing for continued and consistent use along the CDNST specific to hiking, bicycles, and horses will remain important, as well as access to dispersed/backcountry campsites in the project area. Other recreation impacts from the plan include:

- Trail users would discern short term adverse alteration to the foreground following implementation as dead and down material would be left in piles to cure until the piles could be safely ignited and the burn scars restored. Smoke from pile burning may be visible and experienced by trail users in the short term.
- The trail would remain open during fuel treatment prescription implementation but trail users could experience delays up to 30 minutes to protect public safety. During implementation and in between delays, users of the CDT would be able to see crews and equipment as well as downed and cut material scattered before being piled.

Conclusion – General Draft Environmental Assessment Comments

Lastly, we support and urge the Forest Service to continue conducting 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.

The EA mentions using best management practices to protect trail aesthetics and function, including retaining vegetative buffers and using naturalistic trail design. However, the document lacks detailed analysis of how project elements conform specifically to the CDNST Comprehensive Plan’s scenery management standards, visual quality objectives, and desired user experiences. On one hand, reducing wildfire risk and improving ecological resilience can protect long-term trail integrity. On the other hand, expanded recreation infrastructure and vegetation management—if not carefully aligned with CDNST best practices and visual quality standards—could degrade trail user experience and scenic values. To better align with the CDNST Comprehensive Plan, the project should include specific references to visual resource management classes, design elements directly taken from the CDNST Vegetation Treatment best practices document, and a formal consistency analysis with the CDNST’s scenic integrity and use guidelines.

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 Regional Representative, by phone at (360) 244-9249 or by email at jwilliams@cdtcoalition.org.

Sincerely,

A handwritten signature in black ink, appearing to read "L. Fisher". The signature is written in a cursive, flowing style.

L. Fisher
Director of Trail Programs
Continental Divide Trail Coalition

cc: Claire Cuter, CDTC Trail Policy Specialist; Ben Lara, CDNST Program Administrator