



September 25, 2026

RE: Ogden Poorman Project Scoping Period

Dear Acting District Ranger Kurtz,

Thank you for the opportunity to be involved in the Ogden Poorman Project. We are happy to assist with this process and help the Helena-Lewis and Clark National Forest (HLCNF) strive for the highest quality outcome possible.

Background

The Continental Divide Trail Coalition (CDTC) is the national 501(c)(3) nonprofit organization working with federal land management agencies to complete, protect, and elevate the Continental Divide National Scenic Trail (CDNST).

Designated by Congress as a National Scenic Trail in 1978, the CDNST follows the Continental Divide for 3,100 miles through New Mexico, Colorado, Wyoming, Idaho, and Montana. The CDNST traverses nationally significant scenic terrain and areas rich in the heritage and life of the Rocky Mountain West, connecting communities, cultures, and landscapes.

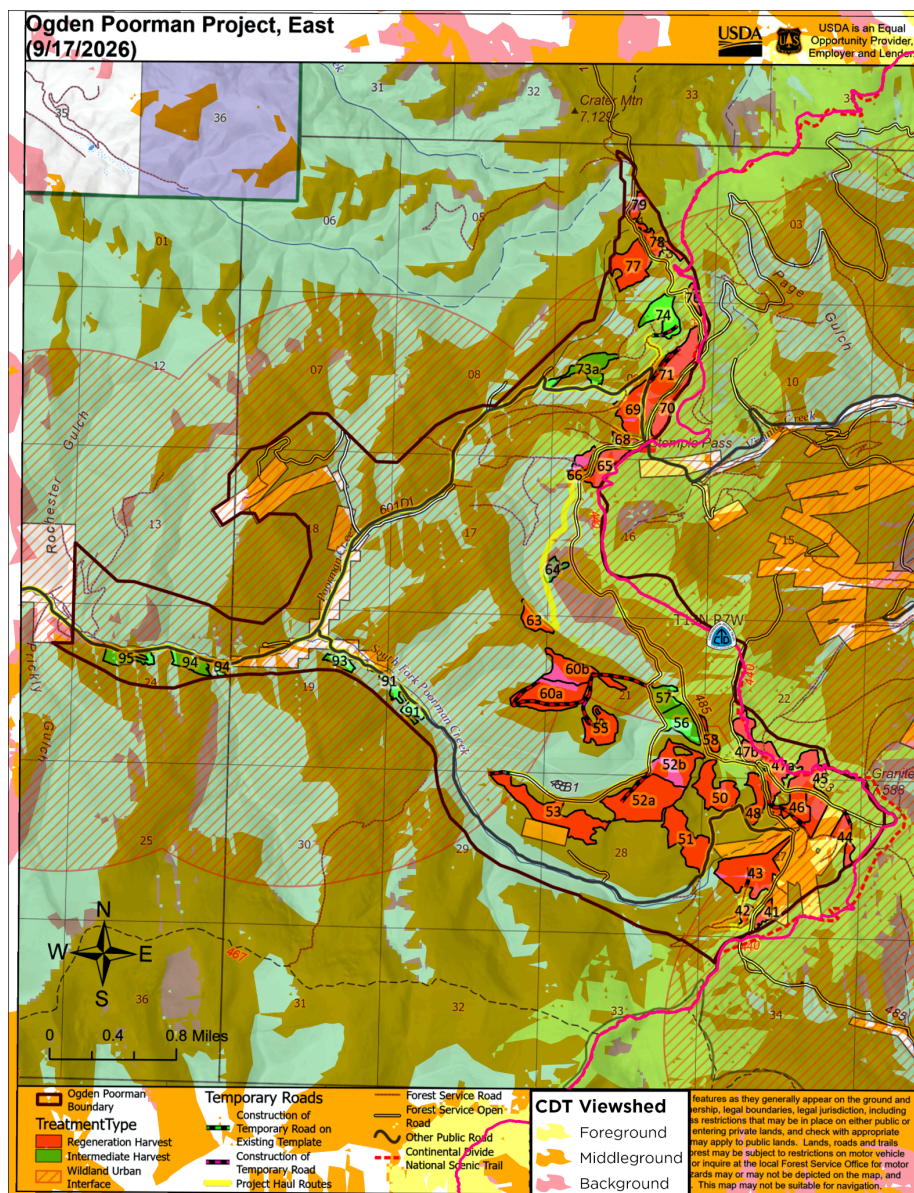
The CDNST is administered by the U.S. Forest Service in cooperation with the National Park Service, the Bureau of Land Management, Tribal, state, and local governments, and numerous partner groups, including the CDTC. In 2025, CDTC signed an Interagency Memorandum of Understanding with the U.S. Forest Service (USFS), Bureau of Land Management, and National Park Service recommitting to our shared stewardship relationship across the Divide.

The Continental Divide National Scenic Trail Comprehensive Management Plan was approved by the U.S. Forest Service and set forward as policy in 2009. **The CDNST Comprehensive Plan establishes the nature and purposes of the CDNST, which are “to provide high-quality, scenic and primitive hiking and horseback riding opportunities and to conserve natural, historic and cultural resources along the CDNST corridor.”** This overarching policy direction serves to implement Congress’s direction in the National Trails System Act, and should be incorporated into all planning direction and project proposal evaluation. **The CDNST Comprehensive Plan also informs FSM 2353.42 and 2353.44b.**

Viewshed Analysis & Potential Impacts to the CDNST

CDTC wholeheartedly understands the need to respond to the mountain bark beetle epidemic in this area to achieve several forest management goals, including wildfire prevention, invasive species response and prevention, and safe management of the wildlife-urban interface. We appreciate HLCNF’s work towards these important goals, and want to commend HLCNF’s for the vegetation management that has been done in this area in recent years.

CDTC is grateful to HLCNF staff for marking the CDNST route on the East scoping map. In order to further demonstrate potential impacts of the Ogden Poorman Project on the CDNST, CDTC conducted a simple viewshed analysis of the east project area. As demonstrated in the map below, several of the treatment areas directly overlap with the CDNST, and several others are within the foreground (marked in yellow) or middleground (marked in orange) viewshed of the trail. In particular, many areas identified for regeneration harvest (41, 44, 45, 47a, 47b, 65, 68, 70, 71, 76, 78, 79) are along or directly adjacent to the CDNST. Treatments undertaken in these areas have the potential to significantly impact the congressionally-protected scenic quality of the trail.



CDTC supports the responsible forest management work that HLCNF is undertaking in the Ogden Poorman project. **We respectfully request that, whenever possible, the HLCNF consider taking measures to minimize or mitigate impacts on the CDNST's scenic values.**

In particular, CDTC encourages project staff to review the [CDNST Vegetation Treatment Best Practices document](#), produced by the US Forest Service in collaboration with CDTC. The Best Practices document is part of the [CDNST Management Toolbox](#), which also contains other useful management tools and foundational policy documents.

CDTC would like to draw particular attention to the portion of the Best Practices document that states that, “Views from the entire CDNST route should be managed for high or very high scenic integrity within foreground, and, where feasible, middle ground and background.” This is further codified in **FW-CDNST-DC-02 of the HLCNF Plan, which states that “Viewsheds from the Continental Divide National Scenic Trail have high scenic value. The foreground of the trail (up to 0.5 miles on either side) is naturally appearing, and generally appears unaltered by human activities.”**

Since the Ogden Poorman project is located within the foreground, middleground, and background of the CDNST, measures should be taken where feasible to preserve the trail's scenic integrity. These measures may include:

- Creating irregular edges for portions of the Ogden Poorman Project visible from the CDNST to mimic natural vegetation patterns.
- Maintain a minimum of 30% canopy cover, where feasible. It is best to maintain a 50% canopy cover if possible.
- If felled trees must be left, felling them in random patterns promotes a more naturally-appearing setting.
- Maximizing retention of old growth, large, or character trees (a measure that is already identified in the scoping document).

Adoption of these measures is particularly important within the CDNST corridor, which is identified in the HLCNF Plan as ½ mile to either side of the trail tread, to achieve the desired conditions described in the *2009 CDNST Comprehensive Plan* and the HLCNF Plan. This is consistent with guideline FW-CDNST-GDL-03 of the HLCNF Plan, which states that “If forest health projects result in impacts to the scenic integrity of the trail, mitigation measures should be included, such as screening, feathering, and other scenery management techniques to minimize visual impacts within and adjacent to the trail corridor (within the visible foreground of the CDNST at a minimum).”

CDTC staff would be happy to collaborate with the team implementing the Ogden Poorman Project to determine appropriate measures to mitigate impacts on the CDNST viewshed. **We**



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would also be happy to collaborate to communicate any trail closures or rereational impacts from vegetation treatments in order to ensure trail users' safety and compliance.

Because this project will be conducted under a categorical exclusion, and therefore may not have further opportunities for public comment, we'd encourage the HLCNF team to reach out directly and proactively to CDTC or the USFS CDNST Trail Administrator, Benjamin Lara, with any questions, thoughts, concerns, or requests for assistance.

Contact Information

Thank you for the opportunity to participate in the management and protection of the CDNST. We look forward to working with the entire HLCNF staff to ensure the CDNST remains a high quality recreational and scenic resource. Questions or follow up requests may be sent via email to Claire Cutler, CDTC Trail Policy Specialist at ccutler@cdtcoalition.org or by phone at 808-343-0818.

Sincerely,

A handwritten signature in cursive script, appearing to read "L. Fisher".

L Fisher
Director of Trail Programs
Continental Divide Trail Coalition