



710 10<sup>th</sup> Street, Suite 200  
Golden, CO 80401

Bitterroot National Forest  
Stevensville Ranger District  
Attn: Eastside Forest & Habitat Improvement Project  
88 Main Street  
Stevensville, MT 59870

Re: Comments on the Scoping for Eastside Forest and Habitat Improvement Project

Dear Reviewing Office

We appreciate the opportunity to provide comments on the Scoping Notice for the Eastside Forest and Habitat Improvement Project. The Continental Divide Trail Coalition would like to be included as an interested party as this project plan is updated.

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 20 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.

## **Background**

The Continental Divide National Scenic Trail (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.

## **Comments on the Proposed Project**

CDTC appreciates the intent of this plan to reduce the risk of insect and disease infestation for the improvement of forest and habitat health and improve the resiliency 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 expansion of infestation would potentially lead to more extreme conditions that would have an extremely negative impact to the region. Since the project does occur within close proximity to the trail corridor and the immediate and intermediary viewshed of the CDNST, we would like to offer our perspective on the potential impacts to the CDNST, the surrounding area, and the experience of those traveling the CDNST.

The CDNST traverses near the proposed project area, coming within close proximity to the proposed sites for vegetative management. In future project planning maps, if the CDNST is within the area of the map, then CDTC encourages related planning maps to delineate the trail as well as the one-half mile CDNST corridor on either side of the trail. This aids in the public oversight throughout the NEPA process as this plan is considered. As a National Scenic Trail, the CDNST protected corridor should be a spatially identifiable area wide enough to encompass the significant scenic, historic, cultural, and natural features that contribute to the trail's setting and significance (FSH 1909.12, Sec. 24.43 (2)(f)). As dictated by the Forest Service, the CDNST corridor consists of a one-half mile foreground viewed from either side of the CDT travel routes (FSM 2353.44b(7)). This guidance is in keeping with the nature of purposes of the trail 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). An initial analysis of this project demonstrates that approximately 15 miles of trail could be impacted, either by disturbance in the trail corridor, changes to the viewshed, or impacts to travel due to actions from this project.

Primarily of concern are the potential degradation of natural and cultural resources in the impacted area, as well as negative impact to the CDNST experience due to visual obstruction or disturbance from project actions. Impacts to the CDNST and the CDNST corridor could have both unforeseen site-specific and cumulative consequences for the trail, which is not mentioned for analysis in this scoping notice. While the goal of this project is to mitigate future environmental degradation in this area, we believe that there is a balance to be had between planning for those conditions while ensuring strategies for preservation and protection regarding the CDNST's nature and purposes are not subordinate to other forest management objectives. We are supportive of these efforts for resiliency against fire and the health of forest, and hope that evaluation of the impacts to the character and experience of the CDNST will remain a priority for analysis as this project moves forward.

As a concern level 1 travel route, with the scenic integrity objective of high or very high spending on the section of the CDNST, the impacts to the surrounding viewshed, not just the area of the CDNST corridor, is of concern (FSM 2382.1). The 2009 *CDNST Comprehensive Plan* states, "*The Forest Service will apply the Lands Aesthetics - Scenery Management System to address visual resources management on National Forest Service Lands.*" (FSM 2380) We urge consideration of this standard and the appropriate best

practices for the CDNST. The scenic character of the trail is an essential feature to provide for the primitive settings within the CDNST corridor, as established by Congress. As these proposed actions are considered, CDTC hopes you will consider site-specific evaluation of the potential degradation of the visual quality and recreation in this area.. If CDTC can assist with a viewshed analysis from the CDNST, including the viewshed from high-visibility points along the ridgeline trail, we would be happy to collaborate on that analysis to determine potential impacts and mitigation strategies.

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 is also happy to amplify notices within our communication networks to make sure traveler's on this section of trail are prepared for activities related to this project.

Thank you again for the opportunity to provide scoping comments on the Eastside Forest and Habitat Improvement Project in the Bitterroot National Forest. As a leading organization for the protection of the CDNST, CDTC is happy to assist in this process and consult on any potential impacts to the CDT. 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](mailto:Lfisher@continentaldividetrail.org).

Sincerely,



Luke Fisher  
Trail Policy Program Manager  
Continental Divide Trail Coalition

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