

October 20, 2023



To Whom it May Concern:

The Colorado Trail Foundation (CTF) appreciates this opportunity to comment on the Salida and Gunnison Ranger Districts' Monarch Mountain No Name Basin Projects, Project 61373. The CTF is a 501(c)(3) non-profit corporation, with a mission to help build and maintain The Colorado Trail (CT) between Denver and Durango.

The CTF has reviewed the Monarch Mountain No Name Basin Projects Notice of Proposed Action (NOPA), including the NOPA Figure 1, and have the following comments regarding the proposed project:

1. The NOPA discusses the project impacts to the Continental Divide National Scenic Trail (CDNST), including a proposed short reroute of the CDNST to avoid the proposed No Name lift, with the project map showing the proposed reroute (NOPA Figure 1). This portion of the CDNST is also designated the CT (Collegiate West) and maintained by the CTF and all discussion and depictions of the referenced trail and impacts in the project analyses should refer to the trail as the CDNST/CT to provide clarity.
2. The CTF has no objection to the proposed project as the only impact related to the CT is the short (approximately 700-foot) reroute of the CDNST/CT and closures or detours during construction. The CTF supports the short reroute to avoid the proposed lift infrastructure, but requests consideration of a longer reroute to move the existing trail off of ski area roads and onto singletrack trail, as described in more detail below.
3. The CTF requests a field review of any approved reroute with Forest Service staff prior to finalizing the alignment. In addition, the CTF requests the opportunity to use CTF volunteers to assist in constructing the new trail section when the project has been approved.
4. There is no mention of public notification, including of the CTF, for trail closures or detours as a "During Construction" design criteria in Table 2 nor in the discussion under "Recreation" in Table 3. Advance public notification is critical, in particular for long-distance trail users that are unable to change plans without notification. In addition, the duration of trail closures should be minimized to the extent possible, on the order of hours, not days or longer, and use of the trail should be allowed outside of active construction hours of the project, if it can be safely accomplished. If this is not possible, Monarch Mountain should designate an acceptable detour, in consultation with the CTF and others, that allows safe passage of trail users even during construction of the project.
5. This project provides an opportunity to improve the CDNST/CT by extending the short reroute proposed in the project to a moderately long (approximately 2-mile) reroute that would enhance the trail user experience. The existing CDNST/CT leaves singletrack trail as it enters the current Monarch Mountain Special Use Permit (SUP) area from the north, then follows ski area roads until it joins FS Road 237 (Old Monarch Pass Road) for



approximately 0.2 mile to reach Old Monarch Pass, where it leaves the road and continues south on singletrack trail. In total, the trail follows ski area roads and FS Road 237 for approximately 2.2 miles. While the ski area roads are closed to public vehicles and ski area use is relatively limited and FS Road 237 traffic is generally light, trail users typically prefer a singletrack experience rather than traveling roads.

The CTF proposes a reroute of the existing trail beginning slightly north of the upper terminal of the proposed No Name Lift and ending at the Old Monarch Pass (see attached Figure 1). The rerouted trail would stay on the west side of the Continental Divide, passing through the proposed No Name Basin project, then exiting the proposed SUP boundary as it continues south until reaching Old Monarch Pass, where it would continue on the existing singletrack trail south of the pass. The trail would feature a very moderate average grade of approximately 3% with expansive views to the south and west. The alignment shown in Figure 1 is conceptual, and the final alignment would be modified as necessary to avoid the proposed No Name Basin access road, as well as any identified archaeological sites, or other points of environmental concern.

Please contact the CTF if you have any questions regarding these comments. Again, we appreciate the opportunity to comment on this project.

Sincerely,



Tisha McCombs
Executive Director



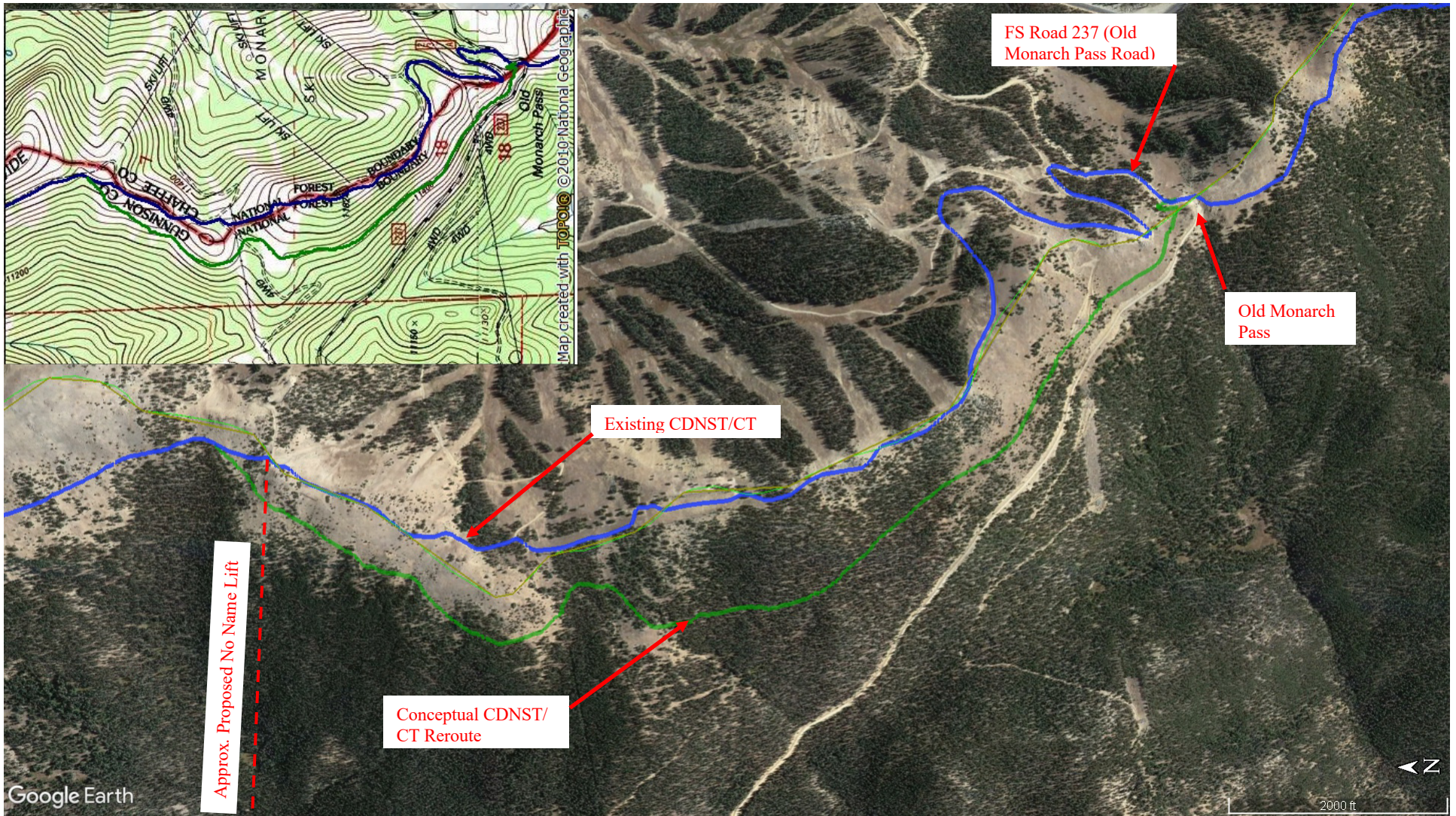


Figure 1. Conceptual CDNST/CT reroute proposed by the CTF.