



**CONTINENTAL DIVIDE
TRAIL COALITION**

710 10th Street, Suite 200
Golden, CO 80401

October 23, 2023

Perry Edwards, District Ranger
United States Department of Agriculture
U.S. Forest Service
Pike-San Isabel National Forests
5575 Cleora Road
Salida, CO 81201

Dear District Ranger Edwards and Project Manager Don Dressler,

Thank you for the opportunity to provide comments regarding the **Monarch Ski Area Expansion #61373** proposal. 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 Pike-San Isabel and Gunnison National Forests. While the plan does present some challenges in terms of rerouting the trail, scenic quality impacts, and potential construction closures, we think there is the potential for some win-win opportunities that will improve the CDNST experience and the co-located Colorado Trail (CT) in the area.

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 3,100 miles of unceded Indigenous lands, 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.

Background Materials

CDTC has provided the following additional materials with our proposal Comments below:

1. CDNST Experience Statement
2. CDNST Optimal Location Review Guide

Current CDNST Route in the Monarch Ski Area and Proposed Alterations:

From the junction with Forest Road #237 (Old Monarch Pass Road), the CDNST goes north for around two miles of existing trail within the current Monarch Mountain Special Use Permit (SUP) boundaries. While the Trail includes scenic views along the Continental Divide ridgeline, ski area signage and service roads make this area confusing for travelers, especially in the summertime.

Since the SUP boundary would be expanded under this project proposal, approximately an additional half mile of the CDNST looks to be incorporated within the Ski Area. According to the official scoping notice, a realignment of the CDNST is needed due the proposed additional ski lift and cultural resources in the area:

To site the top terminal of the proposed No Name lift and provide a trail experience that is consistent with existing conditions, a short realignment of the Continental Divide National Scenic Trail (CDNST) is proposed near the top terminal. Approximately 700 feet of the CDNST would be shifted west of the existing trail alignment (below the top terminal) to avoid user conflicts between the proposed lift, ongoing summer maintenance, and trail users, as well as preserve the overall scenic integrity of the CDNST. This trail realignment would also minimize impacts to cultural resources along the Continental Divide and is intended to provide a balance between recreation and access to the resources that exist in the project area.

In consideration of the attached materials and upon review of the Monarch Ski Area Expansion proposal, we offer the following comments and recommendations:

CDTC appreciates the plan's consideration for the CDNST and CT experience in developing this proposal, but for reference purposes we have attached the complete *CDNST Experience Statement* along with these general highlights below:

- All agencies should plan and maintain the CDNST to include the following characteristics:
 - Built to a non-motorized standard – Fully accessible for foot and equestrian use.
 - Portions accessible for mountain bikes where appropriate and consistent with Unit Plan direction as long as they do not substantially interfere with the nature and purposes for which the CDNST was created.
 - Challenging – Requiring a need for self-reliance and backcountry skills.
 - Located through the most primitive, diverse and undeveloped landscapes on or near the Continental Divide.
 - Accesses or is routed near nationally significant scenic, historic, cultural and natural features.
 - Allows for an opportunity to view dramatic or unique scenery.
 - Allows for an opportunity to view wildlife.
 - Provides appropriate access to water sources.
 - Developed to the simplest, yet high quality standard.

Furthermore, the attached *CDNST Optimal Location Review Guide* helps to provide additional direction for location (and relocation) of the Trail. Clearly stated in this USFS guidance are objectives for the trail, considerations for the trail corridor, and the proper process and documentation meant to accompany any decision to (re)locate the CDNST. If it is the intent of the Forest to relocate this section of the CDNST, the process outlined should be explicitly followed for the purposes of achieving the management objectives for the trail.

In conjunction with these policies and guidelines, CDTC recommends the following actions that have the potential improve the proposed project and mitigate other challenges:

- CDTC supports the Colorado Trail Foundation's recommendation to pursue a longer reroute of the CDNST/CT of approximately 1.9 miles long that would shift the trail to the west of the ridge and move the trail off of the Monarch maintenance roads, thereby reducing confusion for trail users. This new realignment would follow the contour of the west side of the Continental Divide and include more gentle, sustainable grades that will also improve the trail users' experience. CDTC staff would like to coordinate a site visit with CTF and other interested parties next year to explore this option, as well as discuss funding opportunities for the reroute with the Forest Service and Monarch Mountain.
- While the project has the potential to improve some aspects of forest health through the thinning of beetle kill trees as part of the new gladed ski runs in the No Name Basin area, special consideration needs to be given to the CDNST corridor within the newly expanded SUP. The proposed road from the bottom terminal to the top terminal, along

with infrastructure such as ski lifts and ski runs through wetland areas, have the potential to impact the CDNST corridor buffer zone and viewsheds. Some of these impacts may be mitigated through intentional trail design as part of a reroute.

- With construction predicted to take place over multiple seasons, any temporary access roads and closures need to be addressed proactively. If the current CDNST route has to be closed, then official detours will need to be designated, especially if the new trail reroute has not been built. A combination of communication tools such as CDTC's website, Colorado Trail Explorer, and FarOut Guides can be utilized along these lines.
- The current project proposal mentions the GMUG Forest Plan which is currently being revised. It would be helpful to acknowledge any potential changes with the upcoming revisions that could impact this project.

Finally, for future proposals and agency action, it would be most helpful for public review if the CDNST and co-located trails like the CT were better delineated in agency materials concerning any proposed action. For this proposal, a larger scale map that includes the full SUP boundary along with a north/south orientation would be helpful in order to fully identify all the impacts to the Trail from this proposed action and to support informed public participation. (The CDNST is viewable via the [digital interactive map](#).) Additionally, CDTC would like to support the Forest Service with any potential changes to 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

Based on this proposed project, CDTC would support an expanded reroute of the CDNST and CT through the Monarch Mountain SUP boundary area that will improve the overall visitor experience while also accommodating the Ski Area expansion. We believe other challenges presented by this project such as construction impacts, temporary closures, and viewshed changes can be mitigated through adaptive management and coordination with partner organizations.

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. The CDTC is eager to share our resources (volunteer scouts, membership relations, fundraising abilities, volunteer labor, etc.) to work with the Pike-San Isabel and Gunnison National Forests 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 Pike-San Isabel and Gunnison National Forests. If you have any questions, please contact Jordan Williams, Colorado Regional Representative, by phone at (360) 244-9249 or by email at Jwilliams@continentaldividetrail.org.

Sincerely,

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

L. Fisher
Trail Policy Manager
Continental Divide Trail Coalition

cc: Ben Lara, CDNST Program Administrator; Sharon Buccino, Trail and Lands Committee Chair at CDTC; Dayle Funka, Gunnison National Forest District Ranger; Teresa Martinez, CDTC Executive Director; Tisha McCombs, CTF Executive Director