

March 11, 2024



To Whom it May Concern:

The Colorado Trail Foundation (CTF) appreciates this opportunity to comment on the Leadville Ranger District Halfmoon Aquatic Organism Passage and Road Realignment Project 63985 (Halfmoon Project). 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. CTF represents a large and diverse group of volunteers, trail users, and donors; for 2023, this included 906 volunteers that contributed 19,800 volunteer hours, 492 thru-hikers of the Trail, and 2,751 donors from across the country.

The CTF has reviewed the Halfmoon Project Proposal Information and accompanying map and have the following comments regarding the proposed project:

1. The CTF strongly supports the scope of the Halfmoon Project for the intended purposes of reducing impacts to hydrology and fisheries and making the crossing more resilient to potential flooding. These objectives align with the CTF's goal for a sustainable trail with minimum impact to the natural and built environment, including trailheads and access roads.
2. The Halfmoon Project Proposal and Map identifies the existing trail that is impacted as the Continental Divide National Scenic Trail (CDNST). This trail segment is also designated as the CT and, in fact, is maintained primarily by CTF volunteer adopters. Identifying the trail as both the CDNST and CT in the project documents would provide greater clarity for interested parties.
3. The Halfmoon Project Map shows limited topographic detail, but the proposed trail realignment between the proposed parking expansion and the existing trail connection point appears to be close to a fall line alignment. We assume that this may be a conceptual representation of the proposed reroute and not a field-verified proposed alignment and that a final alignment will be identified in the field. We request that CTF field staff participate with Forest Service staff and other partner organizations (such as the Continental Divide Trail Coalition (CDTC)) in a field review of the proposed reroute prior to finalizing the alignment.
4. The CTF would also like to discuss the feasibility of using CTF volunteers to assist in constructing the new trail section and decommissioning the abandoned section when the project has been approved.
5. Finally, we request that timely public communication of any short-term and long-term construction closures restricting either trail or vehicle access be prioritized, particularly with the CTF (and CDTC), so that these closures can be communicated in advance to trail users.

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