

March 4, 2024



To Whom it May Concern:

The Colorado Trail Foundation (CTF) appreciates this opportunity to comment on the Columbine Ranger District Junction-Falls Integrated Resource Management Pre-Decisional Draft Environmental Assessment, Project 62825 (EA). The CTF is a 501(c)(3) non-profit corporation, with a mission to help build and maintain The Colorado Trail (CT, Trail) between Denver and Durango. The CTF represents a large and diverse group of volunteers, trail users, and donors; for 2023, this included 906 volunteers that contributed 19,800 hours, 492 documented Trail completers, and 2,751 donors from across the country.

The CTF has reviewed the EA and have the following comments regarding the proposed project:

1. The CTF strongly supports the proposed action described in the EA. The CTF's review of the EA primarily focused on direct impacts to the Trail, but many of the proposed activities within both the Junction Creek Road/Logchutes Uplands and the Dry Fork/Junction Creek Riparian Corridor project geographic areas may indirectly impact the CT and trail users and were therefore also reviewed. In particular, the CTF specifically supports the following proposed actions to address the three values included in the scope of the EA because of the direct and indirect benefits to the Trail. These include the following proposed actions summarized in the Needs for the Proposal:
 - 1.c. Be sensitive and responsive to tribes by protecting cultural resources.
 - 2.b. Reduce impacts and sedimentation to wetlands, riparian areas, and other groundwater dependent ecosystems.
 - 3.a. Restore diversity in forest structure and age classes.
 - 3.b. Promote forest resiliency to insect, disease, and climate change.
 - 3.c. Provide effective big game winter range and elk production areas.

The CTF supports these specific proposed actions because they will improve and protect the natural environment adjacent to the Trail and recognize the heritage of the land that the Trail passes through. In particular, the Forest values actions (3.a and 3.b) will improve forest health and reduce the chances of catastrophic wildfires that would impact the Trail. The remaining proposed actions identified in the Needs for the Proposal, while positive in scope, are unrelated to the CTF's mission and were not reviewed.

2. In general, the CTF supports the use of all three forest health and fuels mitigation treatments, including broadcast prescribed fire and pile burning, mechanical mastication, and hand thinning treatments, as determined to be most appropriate within specific areas of the project limits. However, the CTF requests consideration of a CT trail corridor, which we suggest to be 100-ft minimum, where use of treatments that might be considered aesthetically objectionable, such as mechanical mastication and construction of control lines, is minimized where possible while still achieving the treatment objectives.

3. The CTF supports the rehabilitation of bare and eroding streambanks along Junction Creek where trail users have created social trails from the CT to access the creek. Actions specified in the EA could include bank armoring, slope stabilization, vegetation re-establishment, and other site-specific best management practices. One aspect of a sustainable trail system is to provide access to desired locations, and closing off creek access points will likely result in re-establishment of the unsustainable social routes or relocation to other unsustainable access points. The CTF recommends consideration of sustainable stabilization methods, such as hardening the existing social trail tread or installing check steps, or providing more sustainable access routes to the creek, to maintain at least a portion of these access routes, where appropriate.
4. Mechanized equipment will be considered for implementing the streambank rehabilitation activities. While the EA specifies that the work would be between the CT and Junction Creek, if any mechanized equipment needs to use the Trail to access the work sites, any damage to the Trail should be rehabilitated immediately, if possible, or upon completion of the work.
5. If the proposed streambank rehabilitation activities result in any additional impact to the CT, the CTF requests field review with CTF field staff to understand the impacts and provide input on the resolution of those impacts.
6. The EA specifies that the public will be notified in advance of operations and temporary trail and road closures, including affected permit-holders and private inholding owners. The CTF requests that the CTF (and our partner organization Durango Trails) be included in these notifications so that these closures can be communicated to trail users that may not be aware of local press releases and other notification channels.

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