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March 28, 2024

Leadville Ranger District
Pike-San Isabel National Forest
c/o Janelle Valladares

RE: Halfmoon Aquatic Organism Passage and Road Realignment Project

Thank you for the opportunity to provide comments regarding the Halfmoon Aquatic Organism Passage and Road Realignment Project. 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)**.

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 300,000 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.

Current CDNST Route in Halfmoon Area:

According to the proposal, "The Continental Divide National Scenic Trail (CDNST) would be realigned with 300 meters (0.18 miles) of new trail alignment and rehabilitation of 550 meters (0.3 miles)." The CDNST in this area is co-aligned with the Colorado Trail, with the Mount Massive Wilderness about 700 feet to the north of the road, and the popular North Mount Elbert Trail cutoff just 1.5 miles to the south. As a key access point to the two highest mountains in Colorado, this area will continue to see high usage by trail users and day visitors.

Upon review of the Halfmoon Organism Passage, we offer the following comments and recommendations:

CDTC supports the scope of the project for the intended purposes of improvements to the fish/wildlife populations, riparian areas, and flood-risk management, as well as the rehabilitation of the previously disturbed areas once the new installations are complete. Additional amenities directly on the CDNST/Colorado Trail such as a restroom and new trailhead parking have the potential to allow for more responsible recreation by trail users while proactively supporting balanced visitor use in an area that has steadily grown in popularity.

Regarding the potential realignment of the CDNST/CT, the conceptual map does show a new fall line trail connection that may not be the most sustainable with long term, heavy use or in the event of extreme weather events. CDTC would welcome the opportunity to work with the Colorado Trail Foundation and the Forest Service to find the optimal location for the Trail through this area with a field review/site visit when appropriate. Additionally, when trail construction efforts and decommissioning need to occur, CDTC can be a resource to mobilize our volunteer network in partnership with agency efforts on the ground.

With implementation for this project scheduled in 2025, the potential for trail closures and temporary reroutes may be needed to ensure construction can progress smoothly while still allowing access to the CDNST/CT during the busy visitor season. CDTC has a trail user alert system via SMS Text and a new Interactive Map that can display alerts and closures. CDTC would also 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

CDTC appreciates the opportunity to comment on this proposal, and looks forward to supporting the goals of the project while ensuring the access to the CDNST continues in a sustainable manner for the long-term.

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 Leadville Ranger District 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 USFS staff and ensuring the CDNST remains a high-quality recreational resource in the Pike-San Isabel National Forest. 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".

L. Fisher
Director of Trail Programs
Continental Divide Trail Coalition

cc: Ben Lara, CDNST Program Administrator; Teresa Martinez, CDTC Executive Director; Patrick Mercer, Leadville District Ranger