

December 2, 2024



To Whom it May Concern:

The Colorado Trail Foundation (CTF) appreciates this opportunity to comment on the Pike National Forest Lower North-South Vegetation Management Plan Draft Environmental Assessment (EA), Project 65019. The CTF is a 501(c)(3) non-profit corporation, and is the primary Forest Service Partner 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 2024, this included 653 volunteers that contributed 11,818 hours, over 500 documented Trail completers, and approximately 2,800 donors from across the country.

The Proposed Action is intended to improve forest resiliency through the use of targeted vegetation management treatments. These treatments would include mechanical and manual thinning, prescribed burning, and/or other fuel reduction methods across the project limits. The overall objective is to “restore sustainable forest conditions that are resilient to fire, insects, and diseases, while providing for diverse wildlife habitats, recreational opportunities, and sustainable watershed conditions.” The project has a lengthy timeframe, with the Proposed Action and subsequent management actions being implemented over approximately 20 years.

Approximately 40 miles of the CT, all within the South Platte Ranger District, are located within the project limits. The CTF’s review of the EA focused on direct impacts of the Proposed Action to the Trail, only, due to our mission focus. Although there are many important beneficial outcomes to other project environmental resources, including watersheds, public infrastructure, and others, the CTF’s comments do not address these anticipated outcomes.

The CTF has the following comments regarding the proposed project:

1. The CTF strongly supports the Proposed Action for the beneficial outcomes to the Trail, including reducing the potential for widespread high-intensity fires that would impact the Trail itself, the visual and scenic resources surrounding the Trail, as well as Trail users. Uncontrolled fires may result in trail closures and increased trail maintenance needs due to increased erosion/sediment deposition and downed trees on the Trail. While the Proposed Action will likely result in some impacts to the Trail, including trail closures during vegetative treatment actions, air quality impacts from prescribed burns, noise impacts from heavy equipment and chain saw use, potential disturbance of the Trail where heavy equipment access may be required, these impacts would be relatively short-term with a planned schedule so that Trail users can be notified and any tread and visual/scenery resource impacts repaired in accordance with the project design criteria.
2. The EA states that implementation would require “additional agency coordination when exact actions and locations are determined” (Section 2.2, Page 6). Similarly, the EA states that “as part of continuing collaboration during the implementation phase, project managers will provide open, continual communication as appropriate during project planning” (Section 4.1, Page 93). The CTF appreciates this approach to coordinating and collaborating during project implementation. In

response to this stated approach, the CTF requests that Forest Service staff notify CTF staff when the CT is located within a planned treatment area. This project, in addition to the stated objective to restore sustainable forest conditions, would provide opportunities to realign limited sections of the CT that are unsustainable, due to their fall line alignment or excessive grade. These unsustainable sections have resulted in excessive erosion of the tread, sedimentation in water courses, and an undesirable recreational experience for trail users. The CTF has not identified specific locations of unsustainable sections to date, but with sufficient advance notice from Forest Service staff, would identify the unsustainable sections located within a planned treatment area and review proposed solutions for these sections with Forest Service staff prior to implementation of the treatment(s). The CTF conducts numerous volunteer trail crews each season and has completed several realignments within the project limits over the last several years and could plan future volunteer crews to complete any approved realignments. This would provide an added recreational benefit beyond the specific vegetation management treatments to improve forest resiliency planned as part of the Proposed Action.

3. Related to the EA statements regarding agency coordination and communication discussed above, the CTF requests advance notification of each planned treatment area that impacts the CT (directly or indirectly), as well as the treatment schedule, so that impact and schedule can be publicized to CT users. While we are sure the Forest Service will publicize this information to the general public, the CTF is in close communication with Trail users through social media and the CTF website and Trail users rely upon us for Trail use notifications. In addition, the CTF plans volunteer trail crews a year in advance and knowing of anticipated treatment areas and schedules ahead of time will help prevent any potential crew scheduling conflicts within the project limits. Finally, the CTF relies on volunteer adopters to provide general trail maintenance along the entire length of the CT. Being able to notify our adopters in advance of any closures or indirect impacts to an adopter section within the project limits and the schedule of those impacts is critical for management of the CTF adopter program. For these reasons, the CTF requests advanced notification, to the extent possible, by the Forest Service project managers of planned actions that impact the Trail so that our trail maintenance and construction efforts are efficient and effective.
4. Appendix C of the EA details the project design criteria that the Proposed Action would incorporate. The CTF supports these design criteria, particularly those relating to rehabilitation of fire lines, closure and reclamation of temporary roads, protection and repair of recreational facilities, and protection of visual/scenery resources. The CTF requests notification by Forest Service staff when a planned treatment directly impacting a portion of the CT is nearing completion and a scheduled field visit with Forest Service and CTF staff to ensure that impacts to the Trail have been addressed in accordance with the project design criteria.
5. Table 1 in Appendix D includes a list of “Permitted O&G” (Outfitter and Guide) activity but does not include the permitted CTF Trekking Program. This program occurs annually, with guided trekking through the project area in early summer. The CTF requests notification by Forest Service staff of any planned treatments that impact the CT during this timeframe in order for us to assess the impacts to this program.

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

Sincerely,



Paul Talley
Executive Director