

May 2, 2025



To Whom it May Concern:

The Colorado Trail Foundation (CTF) appreciates this opportunity to comment on the Dillon Ranger District Town of Frisco Backyard Fuels and Recreation Project Draft Environmental Assessment (EA), Project 63395. 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) 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 reduce high intensity wildfire risk, improve the trail system and recreation facilities, and protect natural, historic, cultural, and Tribal resources within the project limits, which includes a portion of the Camp Hale-Continental Divide National Monument. Approximately 1.0 mile of the CT (co-located with the Continental Divide National Scenic Trail, CDNST) is located within the project limits. Although there are many potential beneficial outcomes resulting from the Proposed Action, the CTF's review of the draft EA focused on direct impacts of the Proposed Action to the CT, only, due to our mission focus.

The CTF has the following comments regarding the proposed project:

1. The CTF strongly supports the Proposed Action for the beneficial outcomes to the CT by reducing the potential for widespread high-intensity fires and the resulting impacts to adjacent visual and scenic resources, as well as direct impacts to the CT/CDNST and 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 CT/CDNST. The relatively small 2017 Peak 2 fire, located just outside of the project limits, for example, resulted in closure of the CT/CDNST to trail users and evacuation of nearby residents, as well as hazard tree removal and trail rehab after the fire was extinguished before the trail was reopened to users; a larger fire within the project limits could result in more significant impacts to the CT/CDNST. While the Proposed Action will likely result in some impacts to the CT/CDNST, including trail/access point closures during vegetative treatment actions, air quality impacts from prescribed burns within the project limits, noise impacts from heavy equipment and chain saw use, these impacts would be relatively short-term and would be outweighed by the long-term benefits. The CTF requests notification as approved fuel reduction measures are scheduled so that trail users can be notified of anticipated impacts via social media communications.
2. A relatively short section (0.63 miles) of the CT/CDNST is located within a proposed fuel reduction treatment unit. The proposed treatment for this unit, dead only treatment prescription, would consist of cutting all standing dead trees to reduce the fuel load. All live trees would be left uncut, except for incidental removal. Cut trees and existing down trees may be piled for burning. This treatment prescription would be the least intensive of the proposed treatment prescriptions within the project limits. The CTF supports this treatment prescription because it has the least

direct impact to the CT/CDNST and preserves the long-term “high” Scenic Integrity Objectives of the trails, even though there may be short-term impacts.

3. While other trails located within the project limits are identified as needing sustainability improvements beyond normal maintenance, no proposed trail actions were included in the project scope for the CT/CDNST. The CTF looks forward to an opportunity to review unsustainable sections of the CT/CDNST with the Dillon Ranger District for suitable trail actions at a future date.
4. A number of non-National Forest Service (NFS) routes are proposed to be adopted and maintained as NFS trails, resulting in several new or changed trail intersections with the CT/CDNST. Updated signage, including directional information for the CT/CDNST, are included in the proposed action and will be critical for route-finding as new trail connections are completed. The CTF requests notification as these trail connections are completed so that trail users can be notified of anticipated impacts via social media communications and CT trail data can be updated.
5. Although the CT/CDNST would remain open during fuel treatment prescriptions implementation, there may be trail user delays of up to 30 minutes to protect public safety. These delays are nominal, but there are other potential impacts to trail users, including smoke during area fuel treatments and noise from chainsaws and heavy equipment. The CTF requests notification of project implementation dates so that trail users can be notified of anticipated impacts via social media communications.
6. The proposed action includes a partnership with The Town of Frisco to maintain the trails and trailheads within the project area. The CTF appreciates the recognition that the CTF Adopt-A-Trail program maintains the CT/CDNST located within the project area and beyond, and that maintenance of the CT/CDNST would not be included in the Town of Frisco’s maintenance responsibilities.

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