



Colorado Springs Utilities

It's how we're all connected

August 1, 2025

Deputy District Ranger Amanda Wheelock
Dillon Ranger District
White River National Forest

RE: Camp Hale-Continental Divide Access Planning

Colorado Springs Utilities (Utilities) respectfully submits this letter as a summary of its preliminary comments on the U.S. Forest Service's (Forest Service) presentation to Utilities on July 14, 2025, regarding the Southern Tenmile Range of Camp Hale Continental Divide National Monument Access Planning effort for the Monument and greater Quandary Peak Area in the Blue River watershed. More detailed descriptions of Utilities' comments on the projects discussed in the presentation are included in that attached document. The attached document also includes comments on the proposed trail connection between Hoosier Pass and the Quandary Peak trailhead that was not included in the July 14 presentation but is under consideration by the Forest Service.

As we have explained previously, Utilities owns and operates water rights in the upper Blue River watershed using a complex network of water collection, conveyance, and storage infrastructure. Federal agencies' resource management decisions within this area have the potential to impact Utilities' water supplies and our ability to access, operate, and maintain our system infrastructure. Due to the complexity of this infrastructure network and Utilities' related access needs, evaluation of the potential risks from proposed management alternatives takes significant time and effort to evaluate comprehensively.

Accordingly, in order for Utilities to provide appropriate comments and supporting information for the Camp Hale-Continental Divide Access Planning effort, Utilities requests that the Forest Service and other cooperating federal agencies regularly engage stakeholders, such as Utilities, to thoroughly understand the impacts of the proposals and evolving alterations thereof and critical water supply operations in the upper Blue River watershed.

In addition, the Colorado Springs City Council and/or the Chief Executive Officer of Utilities (Utilities' CEO) would need to approve the use of Utilities' owned property for projects that would be formally proposed as part the process. As such, any proposals that involve the use of Utilities' property, such as trails or infrastructure improvements, should be excluded or have clear demarcation in the planning materials to specifically address that any proposal involving the use of Utilities' property is under consideration and is subject to approval from Colorado Springs City Council and/or the Utilities' CEO.

A final approval would require a formal agreement with partner agencies for the management of public recreational access that could affect our water system, inclusive of proper management of the broader scope of issues related to existing and proposed recreational uses and related anticipated impacts to Utilities and our partners.

1521 Hancock Expressway
Mail Code 1813
Colorado Springs, Colorado 80903

Phone 719.668-8030
csu.org.



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These considerations include, but are not limited to:

- BLM rights of way granted to the City of Colorado Springs
- Forest Service special use permits issued to the City of Colorado Springs and Utilities
- Property rights acquired to develop water storage and roads constructed for the purpose of accessing, operating, and maintaining our Continental Hoosier System.
- Water rights protection, system operations, infrastructure maintenance, reconstruction, development, mitigation, wildfire prevention, wildfire response, and post-fire mitigation

Utilities appreciates the presentation and discussion with Forest Service staff and the opportunity to describe the critical nature of our water infrastructure, the potential impacts to water supply, and the opportunity to provide a more detailed review of the proposed strategies. It is Utilities' intention to also provide comments during the public scoping period for this project and will continue to be available to assess public requests and proposed changes as they evolve.

Sincerely,

Kim Gortz
Manager, Water Supply Resources
Colorado Springs Utilities

1521 Hancock Expressway
Mail Code 1813
Colorado Springs, Colorado 80903

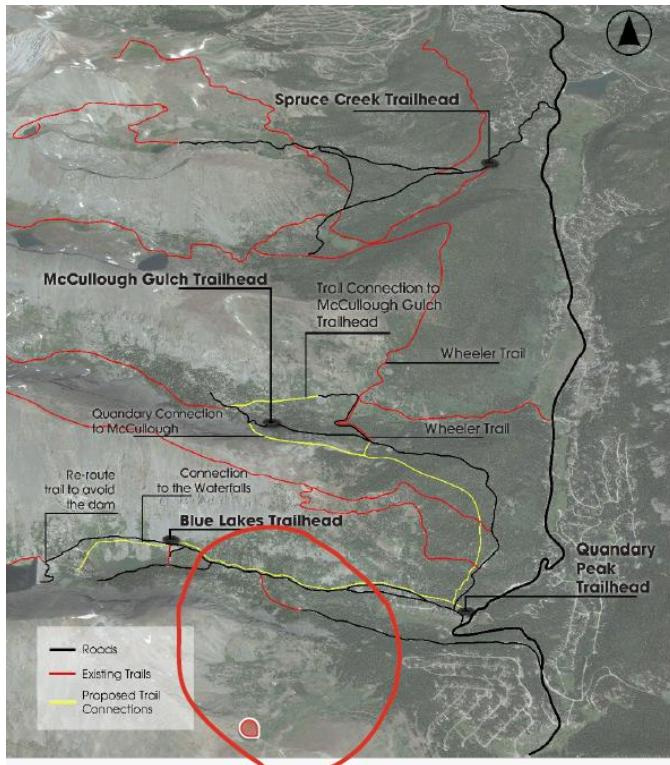
Phone 719.668-8030
csu.org.

Summary comments from provided presentation slides.

Presentation Title: CSU Presentation_STRAP 7-2025 FINAL.ppt

Source: U.S. Forest Service Date: July 14, 2025

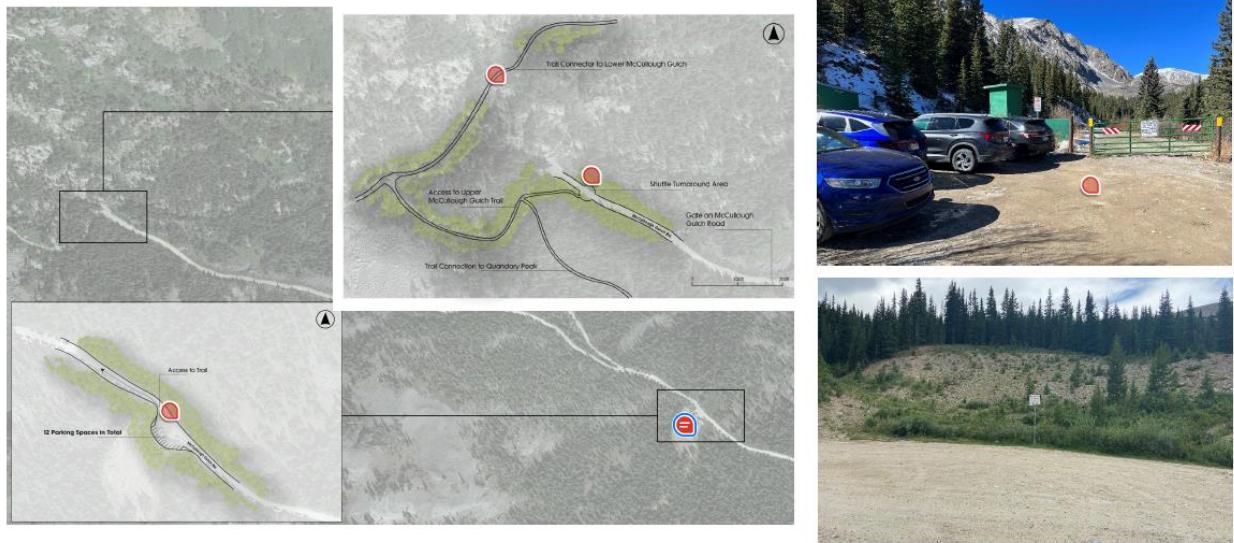
Page 13: Southern Tenmile Region Network Map



Southern Tenmile Region Network Map

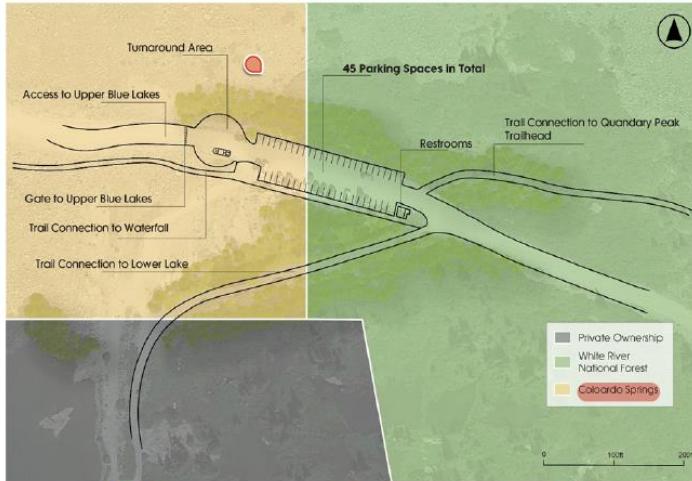
- There is another trail connection not identified on this map to which the Forest Service did not describe or show in this presentation, but has provided some discussion on in 2024. (Circled in red.) The Wheeler trail connection is proposed to link Hoosier Pass area to the Quandary Peak area. Possible routing was to provide trail connection through Utilities' Monte Cristo diversion and tunnel portals.
- Please note that any trail routed through Utilities' property would need to meet the operational and water supply protections and minimize any impacts - this trail would also bring a large number of visitors through a critical component of Utilities' water supply operations. The additional public access to the trail system through an existing road network has not considered the impact to Utilities' operations as well as security and safety concerns.

McCullough Gulch Trailhead



- Please provide additional context for the Lower McCullough trail connection to McCullough Gulch Trailhead. While the current Lower trail leads to Wheeler Trail road and the lower flume bypass on the creek, Utilities would like to make sure that all tunnel portal from the Spruce Creek drainage remains secure and that any trail reroute is directed away from Utilities infrastructure.
- Regarding the administrative use of McCullough Gulch road and gating at the 'Y' road intersection. While the location does not pose a problem, the type of gate used could cause concern with Utilities and the ability to access later on. Utilities needs access to tunnel portals and diversion during times of high snow volume and needing to dig out for access. At a minimum Utilities would require that gate remain in the open position to allow snow removal and access for those times.
- Moving a shuttle stop closer to the trailhead (near the diversion structure, past the current secure gate at the tunnel portal), for shuttle turn around, needs additional assurances to have Utilities property protected. Please consider a clear direction to visitors to access the trail, not allowing users to access the diversion, and keeping the shuttle access gate open or operational has risks for Utilities' access versus the current location of the shuttle.
- Current shuttle turn around area is preferred at intersection of McCullough Gulch road and Lower McCullough Gulch road.
- Providing for parking at this lower location is acceptable. It is understood that there would be a trail connection to QP & McCullough Gulch trailhead. This could continue to be a shuttle stop/turn around and is a preferred location.

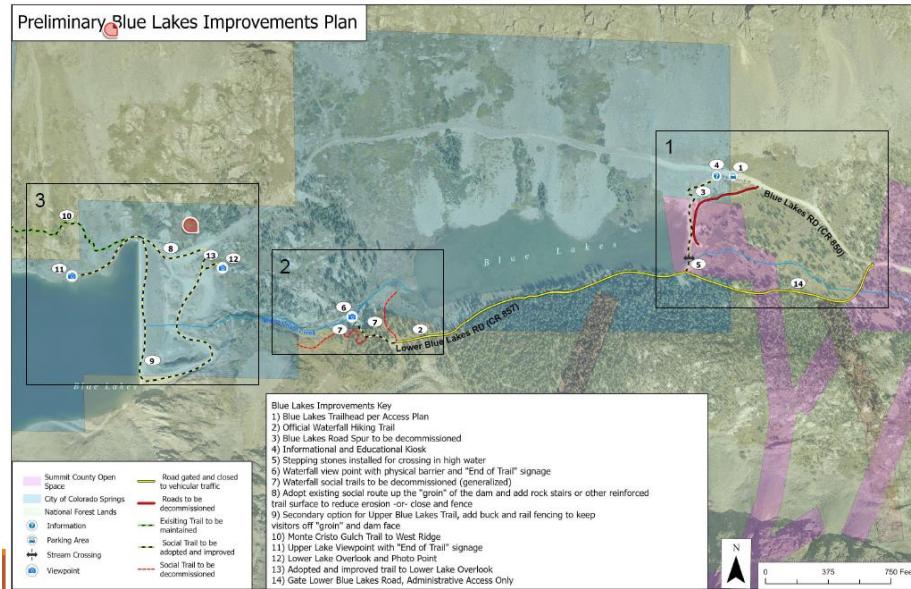
Blue Lakes Trailhead



2/3 of survey respondents support or strongly support the proposed trailhead improvements

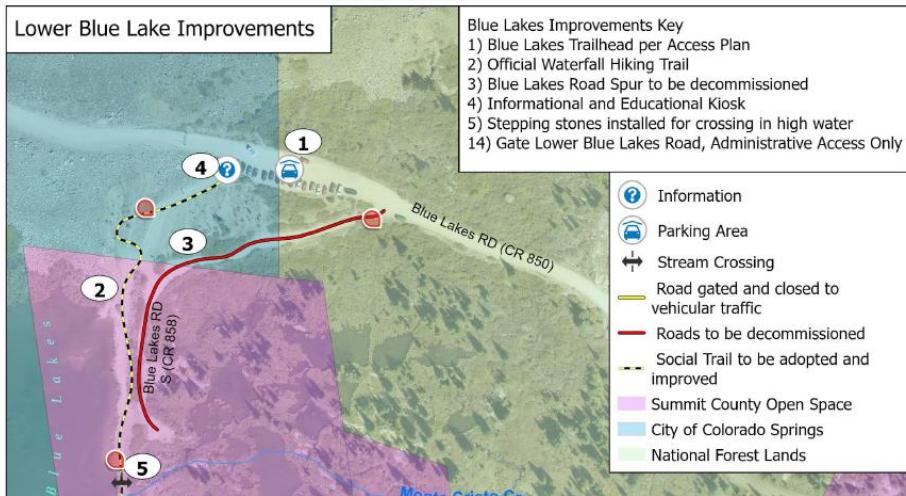


- Correct spelling for Colorado Springs within the legend.
- Please consider that part of this parking area arrangement is on Utilities' property and should be provided as concept idea. Additional discussion with Utilities will be required for further implementation of this concept, which may include a management plan and formal approval for recreational access by City Council.



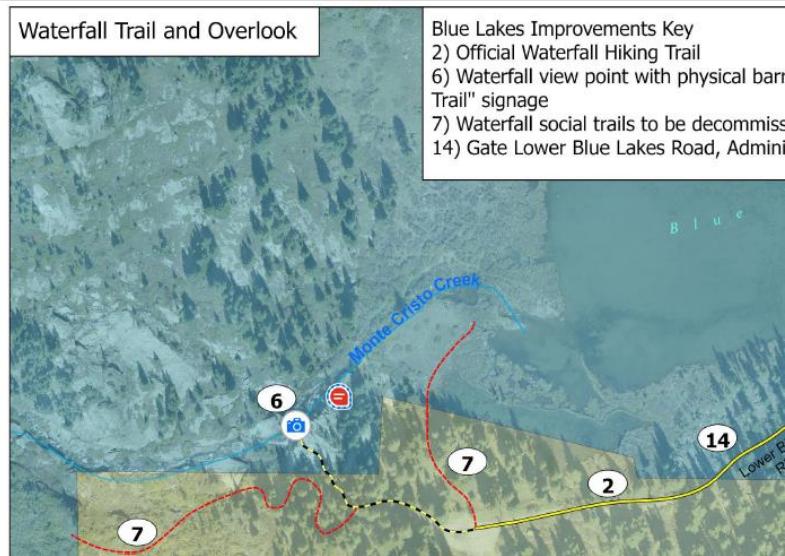
- The improvements shown on Utilities' property will need to be removed as Utilities does not have formalized recreational use authorized and approved by City of Colorado Springs City Council. This impacts items #8, 11, 12, and 13. Utilities does have a special use permit issued by the Forest Service for the construction of the access road to Upper Blue Reservoir and identifies parking area at Lower Blue area and foot access to Upper Blue Reservoir-by using the dam access route to the spillway (item #9) and across the top of dam to get to item #10 and is considered the existing by which the public can access the forest.

Page 20: Lower Blue Lake Improvements



- Items 3 and 4 would be on Utilities' property and should be provided as a concept idea. Additional discussion with Utilities will be required for further implementation of this concept, which may include a management plan and formal approval for recreational access by City Council.
- This road at Lower Blue that is identified to be decommissioned provides Utilities with stable access to maintain the drainage to Monte Cristo Creek, specifically in the shoulder seasons where snowpack is heavy and the lower road is inaccessible.
- Stepping stones or crossing could impact the Utilities requirement to maintain water flow through to Monte Cristo Creek at this location.

Page 21: Waterfall Trail and Overlook



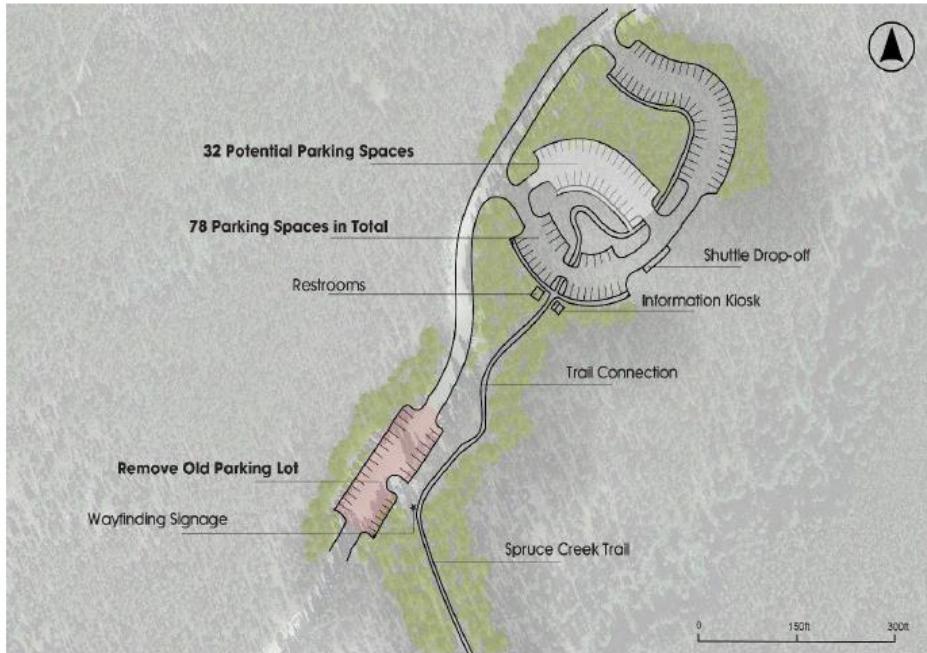
- If Item 2 and 6 is shown on Utilities' property, please show as concept level only - to be determined with discussions of Utilities.
- Item 14, changing the status of the road (CR857) to administrative use only is acceptable.

Page 22: Upper Blue Lake Trails and Overlooks



- Recommend removing components 8, 11, 13 to instead show a concept only depiction of providing additional or alternative connection from (12) picture overlook to (10) existing Forest Service Trail. Item 9 would show existing trail condition.

Spruce Creek Trailhead



- Closure of the old parking lot is acceptable to Utilities as long as Utilities can install a lock for any gates that would impact Utilities' access to infrastructure.



- The trails shown in yellow would need to be verified that they are on Utilities' property. The improvements shown on Utilities' property will need to be removed as Utilities does not have formalized recreational use authorized and approved by City of Colorado Springs City Council.