

April 23, 2026



Dear Ryan Nehl, Pike-San Isabel National Forests & Cimarron and Comanche National Grasslands (PSICC) Supervisor:

The Colorado Trail Foundation (CTF) appreciates this opportunity to comment on the Public Service Company of Colorado (Xcel Energy) Circuits 9254, 9255, and 9257 115 kV Transmission Line Rebuild Project (Project). 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 2025, this included 686 individual volunteers that contributed 10,740 hours, with over 600 documented Trail completers, and 2,501 individual donors from across the country.

The Project analyzed in the Draft Environmental Assessment (Draft EA) includes replacing existing wood poles and rebuilding the transmission lines with a different configuration of steel monopoles, H-frame, and three-pole dead-end structures, widen portions of the transmission line ROWs on BLM lands, and adds legal access routes across USFS-managed and BLM administered to maintain the reliability of electrical service to customers. If approved, the Project is anticipated to be completed during the 2026 through 2028 construction seasons.

Approximately ½ mile of the CT is located within the project limits where the Trail follows the powerline maintenance road between Structures 9255-80 and 84. It should be noted that the EA does not correctly identify this shared location of the Trail on the powerline maintenance road but rather states that the Trail intersects the transmission line ROW at Structure 9255-85 (where the Trail is outside of the ROW) and Structure 9255-83 (which is a portion of the continuous section sharing the maintenance road between Structures 9255-80 and 84). In addition, the Trail crosses under the transmission line between Structures 9255-87 and 88, as well as under the transmission line and across the powerline maintenance road between Structures 9255-92 and 93.

The Project is likely to have significant, but short-term, impacts to these limited portions of the Trail and Trail users, including temporary trail and access closures, tread damage, noise impacts, and impacts to the scenic environment. The CTF's review of the Draft EA, including Appendices D (Design Features) and J (Construction Mapbook), focused on direct impacts of the Project to the Trail, only, due to our mission focus. Although there are important natural resource impacts addressed in the Draft EA and appendices, the CTF's comments do not address these impacts and proposed mitigation strategies.

The CTF has the following comments regarding the proposed project:

1. The CTF understands the need for maintaining and upgrading transmission lines and does not object to the Project or its proposed implementation. The impacts to the Trail, while significant, will be short-term and scheduled with some advance notice. The CTF requests advanced communication of scheduled closures of the Trail or access roads so that the CTF can communicate these impacts to both long-distance and day trip trail users.

2. The CTF requests consideration of relocation of the Trail between Structures 9255-80 and 84, approximately ½ mile, where the Trail follows the powerline maintenance road. Relocating the Trail would eliminate the need for a trail closure during construction, as well as improve the aesthetics of the Trail. If this is not possible during the Project implementation timeframe, the CTF requests that the Leadville Ranger District consider this relocation for a future project.
3. If the trail relocation mentioned above is not feasible within the Project implementation timeframe, the CTF requests consideration of a temporary off-trail route that could be identified and flagged so that long-distance trail users can avoid a significant bypass of the Trail. A good portion of the area surrounding this section of the Trail is relatively open terrain and the CTF is willing to help identify a safe temporary bypass that minimizes environmental impacts, if the terrain and environmental conditions are suitable. Due to the likely short-term need for this off-trail route, the CTF does not propose clearing brush or down trees along the route. Trail users not wanting to use the off-trail route can use the bypass route identified as part of the Project plan.
4. Appendix D – Project Design Features identifies measures that will be taken to address project impacts. The CTF has comments on the following Design Features specifically related to project impacts to the Trail.
 - a. Land Use and Recreation LU-5: While “construction will be timed, where practical, to minimize disruption of normal public seasonal activities as well as avoiding peak use periods (i.e., weekends and holidays),” many trail users are traveling the length of the Trail and do not have the flexibility to schedule their travel through the Project impacts during weekends or holidays. The CTF requests that the project work impacting the CT be scheduled during the shoulder seasons (Spring to early Summer or Fall) if at all possible.
 - b. Land Use and Recreation LU-5A: This design criterion specifies that “any damage to trails or trail tread would be repaired as soon as practicable.” After construction of the portions of the Project that have impacts to the CT have been completed, the CTF requests that CTF staff conduct a field inspection with Forest Service staff to ensure that any damage to the Trail has been repaired.
 - c. Land Use and Recreation LU-6: “Advanced notice of construction activities will be given to private landowners, land managers, and residents potentially affected by construction activities.” The CTF also requests advanced notification of construction activities for those portions of the Project that impact the CT, as identified above.
 - d. Land Use and Recreation LU-8: “Xcel will provide a schedule of all planned construction activities to the AO prior to the start of construction.” The CTF requests that the AO share the schedule of planned construction activities as soon as it is available to allow communication with trail users of anticipated closures.

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
The Colorado Trail Foundation