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Comments: RE: Monarch Mountain No Name Basin Projects Objection

Thank you for the opportunity to provide comments regarding the Monarch Ski Area Expansion #61373 proposal. 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) within the Pike-San Isabel and Gunnison National Forests. While we appreciate the intention behind many components of the proposal, we are filing one objection as detailed below.

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 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.

## Background Materials

CDTC has provided the following additional materials with our Objections below:

1. CDNST Comprehensive Plan
2. CDNST Optimal Location Review Guide

From the EA's Recreation Technical Report: "Given scenery contributes heavily to the recreation experience for trail users, recreation on CDNST/CT is compromised, as this segment occurs along the ridgeline between No Name Basin and Monarch's existing SUP area. Therefore, the recreation experience for users on this CDNST/CT is subdued, influenced by its proximity to the existing developed ski resort."

From the EA's Scenery Technical Report: "To the east of the existing trail along the ridge of the Continental Divide, Monarch's existing developed ski area is visible to trail users, overlooking open ski trails and elements of ski infrastructure. Additionally, the same segment (of the CDNST) is located on a maintenance road. Thus, users have developed recreation within their viewpoints while recreating on the CDNST/CT proximate to Monarch. Conversely, to the west of the trail, the undeveloped No Name Basin terrain is visible to users. The western limited views of No Name Basin's natural landscape contrast with the eastern views of developed ski infrastructure and runs seen by trail users on the CDNST/CT."

## Statement of Objection

With these factors in mind, and upon review of the Environmental Assessment and Finding of No Significant Impact, the Continental Divide Trail Coalition is submitting the following objection regarding the Monarch Mountain Expansion Project and associated documents.

Objection: The proposed reroute/adjustment/realignment of the CDNST does not meet the USFS management standards for a National Scenic Trail as described in the CDNST Comprehensive Plan, Forest Service Manual Section 2353.44b, and CDNST Optimal Location Review Guide.

While the proposed 700-ft reroute of the CDNST as part of this project attempts to improve on the scenic and recreational values of the Trail with a small realignment to the west of the Divide, CDTC believes that more needs to be done now so that the Trail throughout the Monarch Ski area can better match desired conditions and management standards for the CDNST. With the concerns highlighted in the technical reports regarding compromised recreational activities and the current maintenance road alignment, CDTC recommends a reroute of approximately 2 miles of the CDNST that would shift the trail to the west of the ridge and move the trail off of the maintenance roads. This recommendation mirrors comments provided by the Colorado Trail Foundation during the initial comment period.

We also suggest that while No Name Basin is being developed for additional recreation activities benefitting private business, that other recreational opportunities related to the CDNST/CT (which are open to the public free of charge) should be included in the development planning. So much capacity and resources are going into developing and managing recreation in No Name Basin and Monarch Mountain including gladed ski runs, a new mechanized lift, and vegetation management actions, and that the same duty of care should be given to the CDNST so as to benefit both public opportunities and private enterprise.

In response to the longer trail reroute suggestion during the first of round comments however, the updated project materials from the USFS state, "The (longer) alternative reroute of the existing trail was considered to assess disturbance to resources, but ultimately dismissed, as the currently proposed realignment has been designed to accommodate the top terminal of the proposed No Name lift and provide a trail experience that is consistent with existing conditions."

We would like to document that the Recreation and Scenery Technical Reports stipulate the current conditions for the CDNST in the area do not align with the management guidelines for the CDNST. Therefore, by only going forward with the small trail realignment currently proposed by the USFS as part of this project, the project managers are restricting themselves by trying to match existing conditions for the CDNST through the area when the agency's own analysis states that the current standards currently do not meet match the agency's guidance for the CDNST. The lack of compliance with Agency direction regarding the CDNST's nature and purposes should be addressed through this process and to not do so at this time severely impacts the nature and purposes for which the CDNST was created. This process should be used as an opportunity to correct past misalignment, and now align activities with the nature and purposes of the CDNST, the Comprehensive Plan direction, and the Forest Service Management Handbook direction for the CDNST. A solution that helps achieve this result is to concurrently plan for an extended reroute of the Trail alongside development of the No Name Basin area.

Standing: CDTC has standing as we submitted substantive comments on the Monarch Mountain Expansion Project #61373 on October 23, 2023. These comments are included with this objection.

Issue and Statement of Explanation - CDTC Objection 1: CDTC objects to the lack of alignment with the 2009 Comprehensive Plan, the National Trails System Act, and other USFS Management Guidelines for the proposed

reroute/adjustment/realignment of the CDNST as part of the Monarch Mountain No Name Basin projects. Primarily, the Desired Conditions, Standards, and Guidelines described in the plan do not meet the nature and purposes of the CDNST.

Desired Conditions, Objectives, Standards, Guidelines, and Management Approaches for the Continental Divide National Scenic Trail as part of Objection 1:

1) From the CDNST Comprehensive Plan:

a. Sec. II A: The nature and purposes of the CDT are to provide for high-quality, scenic and primitive hiking and horseback riding opportunities and to conserve the natural, historic, and cultural resources along the CDT corridor.

b. Sec. IV. B(1)(b)(2): Locate a CDT segment on a road only where it is primitive and offers recreational opportunities comparable to those provided by a trail with a designed use of Pack and Saddle Stock.

c. Sec. IV. B(1)(b)(3): The trail shall be located as close to the geographic divide as possible[hellip]

i. Note: The current route through Monarch Mountain closely follows the actual Divide, but the majority of the CDNST in this area is on a maintenance road/ski run. Moving the trail to the west is needed due to the proposed ski lift, which has the opportunity to actually improve the scenic values and be in more line with the rest of the Comprehensive Plan if an extended reroute beyond the 700ft realignment is pursued.

2) From the FSM 253.44b - CDNST

a. Use the Scenery Management System (FSM 2382.1; Landscape Aesthetics: A Handbook for Scenery Management, Agricultural Handbook 701, 1995, <http://www.fs.fed.us/cdt>) in developing CDNST unit plans and managing scenery along the CDNST. The one-half mile foreground viewed from either side of the CDNST travel route must be a primary consideration in delineating the boundary of a CDNST management area (para. 2b). The CDNST is a concern level 1 route (Landscape Aesthetics, page 4-8), with a scenic integrity objective of high or very high, depending on the trail segment (Landscape

Aesthetics, page 2-4).

3) From the upcoming revised Grand Mesa, Uncompahgre, and Gunnison National Forest Management Plan:

a. FW-DC-DTRL-02: Viewsheds from the CDNST have high or very high scenic values. The foreground of the trail (up to 0.5 mile on either side) is natural-appearing and generally appears unaltered by human activities. Where possible, the trail provides visitors with expansive views of the natural landscape along the Divide[hellip]

i. The Revised GMUG Forest Plan provides scenery integrity objective exemptions for the Monarch Mountain area, but with the need to reroute the CDNST away from the new No Name Basin chair lift, now is the time to plan for a longer reroute. When time, capacity, and resources are limited, a more proactive approach would be to work on an inclusive plan now that resolves issues for the CDNST throughout the Monarch Ski area long-term, rather than waiting to do a more complete reroute later. That way, agencies and partners can try to avoid utilizing redundant resources and creating greater impacts on the conservation value of the area through multiple rounds of mitigation potentially.

4) Solution/Remedies: CDTC recommends pursuing a longer reroute of the CDNST/CT of approximately 1.9 miles long that would shift the trail to the west of the ridge and move the trail off of the Monarch maintenance roads, thereby reducing confusion for trail users. This new realignment would follow the contour of the west side of the Continental Divide and include more gentle, sustainable grades that will also improve the trail users' experience.

a. See the attached initial comments from CDTC for more information about the reroute in conjunction with the Colorado Trail Foundation's proposal. CDTC works closely with

CTF where the trail is coaligned, and we strive to work together to ensure optimal conditions and management throughout the state. The solution proposed above is an example of the cooperative stewardship model at work, where our two organizations believe the trail experience can be improved proactively by aligning with agency direction for the CDNST.

Violations of Law, Regulation or Policy: National Trails System Act; National Forest Management Act; 2009 CDNST Comprehensive Plan; FSH 2353.44.

## Conclusion

Based on this proposed project, CDTC would like to see an expanded reroute of the CDNST and Colorado Trail through the Monarch Mountain SUP boundary area that will improve the overall visitor experience while also accommodating the Ski Area expansion. With all the proposed recreational development in the No Name Basin being paid through private development, now is the time to relocate the CDNST/CT so that it better matches USFS management guidelines and desired conditions in a way that benefits everyone.

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 Pike-San Isabel and Gunnison National Forests 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 regional USFS staff and ensuring the CDNST remains a high-quality recreational resource across the Pike-San Isabel and Gunnison National Forests.