COLORADO
Parks and Wildlife
Department of Natural Resources

Montrose Service Center
2300 South Townsend Avenue
Montrose, Colorado 81401
P 970.252.6000 | F 970.252.6053

March 18, 2024

Uncompahgre National Forest
Norwood Ranger District
Attn: Ms. Krystina Smith
P.O. Box 388
Norwood, CO 81423

RE: Telluride Mountain Club Trail Proposal 2023 #65616

Ms. Smith,

Thank you for the opportunity to provide scoping comment on the Telluride Mountain Club Trail Proposal for the creation of up to 15 miles of new non-motorized trail and up to 5.5 miles of existing trail rehabilitation. Colorado Parks and Wildlife (CPW) has a statutory responsibility to manage all wildlife species in Colorado. This responsibility is embraced and fulfilled through CPW's mission which is to perpetuate the wildlife resources of the state, to provide a quality state parks system, and to provide enjoyable and sustainable outdoor recreation opportunities that educate and inspire current and future generations to serve as active stewards of Colorado's natural resources. CPW encourages the USFS to afford the highest protection for Colorado's wildlife species and habitats. CPW has reviewed the proposal, visited the site, and offers the following comments on potential impacts to wildlife.

Overall comments:

CPW understands that the purpose of the proposed action is "to address the growing demand for outdoor trail-based recreation in the Telluride region." CPW asks USFS to evaluate the impacts to wildlife and wildlife habitat that would be caused by implementation of part or all of the proposed action. CPW encourages USFS to evaluate the proposal for sustainable recreation opportunities that allow for user experience after primarily protecting natural areas and critical wildlife habitats and to minimize impacts to wildlife.

CPW requests clarification of the parameters of scoping for the Environmental Assessment of the proposed action. The news release dated February 14, 2024 indicates "over 15 miles of new trails and approximately 5 miles of trail rehabilitation" but the USFS project page states "construct 11 miles of non-motorized trail and rehabilitate approximately 4.7 miles of trail".

The proposed trails are scattered throughout the Telluride area primarily in high mountain ecosystems with vegetation varying from spruce/fir forests, quaking aspen, open grass meadows, and riparian zones. All trails, except for the ones proposed for rehabilitation, are new trails that are being proposed to fulfill an expressed need for user management and enhanced experience.

The area surrounding the project sites vary. Some areas are in close proximity to and associated with semi-urban residential housing, while others are located in minimally impacted open space. Overall, the area associated with the trail locations is summer range, winter range, and overall range for elk. The trails proposed for the Ilium Valley and the western portion of the Telluride valley are within High Priority Habitat - Elk Severe Winter Range and Migration Corridors. For mule deer, the proposed trails are in summer range with the Ilium Valley trails. All proposed trails fall within summer range and overall range for black bears and high use summer and winter range for lynx. The area also provides habitat for mountain lions, coyotes, foxes, snowshoe hares, raptors, songbirds, and other small mammals.

The loss of any habitat cumulatively impacts the wildlife resource. These impacts can be especially detrimental in areas such as Telluride where development and human disturbance limits sanctuary and escape areas. Habitat loss is not always the physical removal or destruction of habitat. Habitat can be lost to wildlife when the amount of human presence creates enough stress on wildlife to cause avoidance of an area. This is sometimes referred to as "functional habitat loss". The creation of a single track trail physically disturbs a small amount of habitat, but the major concern is the resulting human disturbance to wildlife associated with the creation and use of new trails from any type of use.

The scientific literature has documented disturbance associated with trail based human activity that is a contributing factor in habitat fragmentation. Elk, deer, and other wildlife will move away from human presence and activity. The average distance that animals move away from an anthropomorphic activity is referred to in this letter as the "disturbance distance." The average disturbance distance across multiple publications for deer and elk is 660 meters for non-motorized trail users including hikers and bikers (Wisdom et al 2018) (Table 1).

Table 1. Reported displacement distances of mule deer and elk from motorized and non-motorized use in meters (m).

Author	Species	Motorized	Non-motorized
Rogala et al (2011)	Elk	51-800m	
Citui et al (2012)	Elk	500m	
Preisler et al (2013)	Elk	1000m	200-500m
Wisdom et al (2018)	Elk	500-1500m	558-879m
Wisdom (2005)	Elk	1500m	500-1500m
Taylor and Knight (2003)	Deer		390M
Edge (1982)	Elk	750m	
Sawyer (2009)	Deer	2610m	
Average (meters)		1000	660

Elk and deer generally do not become habituated to hiking or mountain biking (Wisdom et al 2004, Wisdom 2018, Taylor and Knight 2003). Due to avoidance of human activities associated with roads and trail based recreation (OHVs, mountain biking, hiking), elk increase their daily activity levels and movements, which reduces the time spent feeding or resting (Ciuti et al. 2012, Naylor et al. 2009, Wisdom et al. 2004). This increased energy and lactation demand, decreased forage intake, and displacement to areas with poorer quality forage result in a decrease in body condition, which affects

individual health, survival and reproduction (Bender et al 2008, Johnson et al 2004). Avoidance of recreationalists effectively decreases the carrying capacity of an area (Taylor and Knight 2003).

When route densities increase to the point that the predicted behavioral avoidance zone overlaps or intersects with another route, habitat effectiveness is severely reduced or eliminated and can result in a barrier to wildlife use and seasonal migrations. The cumulative effects of multiple routes with intersecting and overlapping avoidance buffers can impact a substantially larger area compared with the habitat loss from the direct disturbance of the individual routes.

When trail planning is conducted in large geographic areas, CPW recommends low density route densities (1mi/sq. mi) so that habitat effectiveness is maintained. In areas such as the Telluride Valley where there are geographic and land ownership limitations to route planning, CPW recommends that routes be concentrated as much as possible to achieve the objective of avoiding disturbance to undeveloped areas as much as possible. CPW recommends that USFS evaluate the proposed trail alignments for the anticipated wildlife disturbances and loss of functional habitat. Despite the existing infrastructure and trails within the Telluride area, there are still places on public land that provide habitat for wildlife. In particular, the Ilium Valley and the area known as "the Wedge" provide important habitat to a variety of non-game, small game, and big game wildlife. This proposal includes new trails which would impact these areas and will add to the cumulative disturbances to wildlife that can impact both individuals and herds.

Trail-specific comments:

Mountain Village to Valley Floor Single Track Connector
This trail cuts through a portion of USFS property locally known as "the wedge." The wedge is part of the movement corridor utilized by elk and mule deer for movement between summer and winter range. It provides important habitat and cover for elk during much of the year. At present, the Valley Floor Trail runs along the northern edge of the wedge where this connector trail is proposed. Further, the Jurassic and Boomerang trail runs along the southern boundary of the wedge.

Based upon disturbance distance studies, the creation of the proposed connector trail would further negatively impact a large portion of the wedge and reduce its effectiveness as hiding or thermal cover for the large ungulates. This undisturbed piece of USFS land currently serves as one of the last security areas for the valley elk herd. These undisturbed areas will become more important as the north side of the valley floor as the Society Turn area becomes more developed. Creation of the proposed connector trail would cause enough disturbance that this area would likely lose its effectiveness for elk habitat. A connector trail along Highway 145 between the western terminal of the Valley Floor Connector Trail and the Meadows Trail or improving the Boomerang Trail would be of lesser impact than this proposed connector trail. Please include these recommended trail alignments within the analysis to meet the purpose and need.

South Side Perimeter Trail
This proposed trail would cut through a currently minimally impacted area owned by the Idarado Mining Company and the USFS. At present, the housing development along Pandora Lane along with traffic on the Legacy Trail have a disturbance impact on elk utilizing the area. The creation of the proposed perimeter trail will further displace wildlife that utilizes the area. CPW recommends enlargement and

improvement of the Legacy Trail to handle increased human activity. If a new trail is constructed, CPW recommends that the new trail be created as close to existing infrastructure, tailings piles, or existing disturbance corridors as possible to reduce habitat fragmentation and habitat effectiveness impacts. Please include these recommended trail alignments within the analysis as an alternative to meet the purpose and need.

Sheep Corrals to Sunshine Trail/Historic Ilium Flume Trail
Creation of these two trails will create disturbance zones that overlap, having an impact on more habitat and wildlife than the creation of one trail would, and therefore it is important to look at their cumulative impacts on wildlife and wildlife habitat.

The proposed Sheep Corrals to Sunshine Trail is within the disturbance zone of San Miguel County Road 63L and might have less impact on wildlife, but the inclusion of the Historic Ilium Flume Trail expands the human disturbance zone and reduces the sanctuary cover available between the valley and existing development on the west meadows properties.

The least disturbance and harm to wildlife would be created by removing the Ilium Flume Trail from consideration and bringing the Sheep Corrals to Sunshine Trail segment closer to San Miguel County Road 63L. If a connecting section of trail is needed for public safety reasons, then CPW recommends aligning the proposed Ilium Flume Trail downslope so that it is within close proximity to the county road or within the county road Right-of-Way until it connects to the Galloping Goose Trail. Please include these recommended trail alignments within the analysis as an alternative to meet the purpose and need.

Sunshine Parking and Connector Trail/Sunshine Trail (Uphill)
The Sunshine Parking and Connector Trail are within the disturbance zone of Highway 145 and the summer use of the Sunshine Campground. CPW agrees that there would be limited adverse impacts to wildlife in the area by its construction.

The construction of the proposed new uphill Sunshine Trail will impact existing habitat. Based upon the disturbance distances provided, the proposed new uphill trail will fragment the habitat in an area which currently provides habitat connection for big game from the Ilium valley to USFS lands east of Highway 145. CPW recommends the evaluation of realignment of the existing Sunshine Trail to better allow for two way traffic and an improved user experience. Rehabilitation of the existing trail to create a more sustainable and more diverse user opportunity would reduce the additional habitat and wildlife impacts that the addition of the proposed uphill trail would create. Please include these recommended trail alignments within the analysis to meet the purpose and need.

Sheep Mountain Traverse
This proposed trail alignments will increase the zone of disturbance well beyond the existing routes into what is currently a minimally disturbed area with few other existing routes. CPW recommends that neither Option A or B is accepted and that the proposed route be moved closer to the existing disturbance zone of the Galloping Goose Trail. CPW acknowledges that different user groups desire different recreation experiences, and sees an opportunity to reduce habitat fragmentation while allowing for these different experiences. Please include these recommended trail alignments within the analysis to meet the purpose and need.

Sunshine Mesa Backcountry Trail Rehabilitation
CPW supports the rehabilitation of these existing trails. CPW supports sustainable outdoor recreation and the opportunity to improve the trail for diverse user groups as well as watershed health.

Again, thank you for the opportunity to comment on the Telluride Mountain Club trail proposal. Please contact District Wildlife Manager Mark Caddy at 970-209-2368 if you have any questions regarding our comments.

Sincerely,

Mark W. Caddy
District Wildlife Manager
Norwood District
Colorado Parks and Wildlife
P.O. Box 532
Norwood, CO 81423

cc: SW Region File; Area 18 File; Rachel Sralla, Area Wildlife Manager; Peter Foote, Land Use Coordinator; Alyssa Kircher, Terrestrial Biologist

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