



**Sheep
Mountain
Alliance**

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Megan Eno
Norwood Ranger District
P.O. Box 388
1150 Forest
Norwood, CO 81423

Dear District Ranger Eno,

Sheep Mountain Alliance (SMA) offers the following comments on the draft Environmental Assessment for the proposed Telluride Mountain Club (TMtC) trails proposal on the Norwood Ranger District of the Grand Mesa Uncompahgre Gunnison National Forest (GMUG). Founded in 1988 to protect Sheep Mountain from logging advances, Sheep Mountain Alliance is a community-based environmental advocacy organization focused on protecting landscapes and communities in Southwest Colorado.

We would first like to thank Telluride Mountain Club and the U.S. Forest Service for working over the past year to discuss the proposal with us and to ensure that a NEPA process is conducted. We applaud the thoughtfulness and effort that has gone into creating this proposal, and are excited to support many of the proposed trails that strike a balance between conservation and recreation in our region. The Telluride Mountain Club is an integral organization in our community that works hard to assist local governments as well as the U.S. Forest Service to provide and maintain trail infrastructure that benefits multiple user groups and we greatly appreciate these efforts. In our comments, we address specific concerns that we have regarding the Sheep Mountain Traverse trail, including its impacts to wildlife, and conflict with the proposed Sheep Mountain Special Management Area in the Colorado Outdoor Recreation and Economy Act. Additionally, we discuss considerations about specific proposed trails and infrastructure. SMA strongly supports Alternative 3 of the Trails Proposal.

Sheep Mountain Traverse Trail Concerns

Wildlife Concerns: Canada Lynx

In December 2024, the U.S. Fish and Wildlife Service released their proposed revised critical habitat map for Canada Lynx, as well as the Canada Lynx Final Recovery Plan. The Revised Designation of Critical Habitat for the Contiguous U.S. The Distinct Population Segment of the Canada Lynx includes 7,679 square miles of newly designated critical habitat for the Southwest Colorado Canada Lynx population. The proposed Critical Habitat designation overlaps with the entirety of the proposed Sheep Mountain Traverse trail.¹

¹ Rocky Mountain Wild. "Canada Lynx Proposed Critical Habitat 2024."

This presents a concern to Sheep Mountain Alliance, as the Canada Lynx Final Recovery Plan outlines the importance of “maintain[ing] or restor[ing] habitats within the focal areas of all six Species Status Assessment units and any other areas potentially capable of supporting resident breeding populations” and “reduc[ing] or remov[ing] threats to the Distinct Population Segment by maintaining or strengthening habitat protections.”² In outlining recovery strategies, the plan states, “retaining most of the existing habitat capability is necessary to maintain current and future population resiliency and contribute to recovery, particularly given projected future loss and Recovery Plan for the Canada Lynx DPS 26 fragmentation of habitats resulting from climate change.”³ The transition of boreal forests to drier forest types that “do not support the dense understory vegetation or conversion to non-forested habitat types” due to climate change may cause the permanent loss of lynx habitat.

As such the following criteria are listed as Priority One Actions for lynx recovery:

- Conduct research and monitoring to develop and implement proactive forest management strategies to improve the resiliency of lynx habitat in each SSA unit given projected impacts of climate change within the DPS (Recovery Criteria 1, 2, 3, 4). 4.
- Maintain or enhance connectivity between lynx habitats in SSA units 1–4 and adjacent lynx habitats north of the U.S.-Canada border (Recovery Criteria 1, 2, 3).⁴

Due to the Canada Lynx’s threatened status under the Endangered Species Act, the USFS must adequately consider the effects of the proposed trail on the species and habitat⁵. This includes the effects of new trail construction, increased human activity through noise and presence, and new habitat fragmentation. The findings of the Environmental Assessment indicate that the lynx habitat present in the subalpine spruce and fir forests where the Sheep Mountain Traverse trail would be built is “of high quality and suitable for lynx.” Furthermore, it identified that the proposed trail overlaps entirely with the lynx linkage area, which promotes species movement across suitable habitat from the main body of the San Juan Mountains and a sub-range of the San Miguel Mountains.

Though the findings of the EA identify few concerns regarding this habitat disruption, the proposed trail accesses entirely new subalpine terrain. Our concerns are further outlined through the specific Southern Rockies Lynx Amendment (SRLA) management guidelines for human use projects. Specifically, we believe this proposed trail does not fit within the following guidelines:

- Objective HU 03: Concentrate activities in existing developed areas, rather than developing new areas in lynx habitat.⁶
- Objective HU G3: Recreation development and recreational operational uses should be planned to provide for lynx movement and to maintain the effectiveness of lynx habitat.⁷

<https://rmwild.maps.arcgis.com/apps/instant/basic/index.html?appid=87c392a10a574b82a6811e339450566f>

² U.S. Fish and Wildlife Service. 2024. pp. 25-26. Recovery plan for the contiguous United States distinct population segment of Canada lynx (*Lynx canadensis*). November 2024. U.S. Fish and Wildlife Service, Mountain-Prairie Region, Denver, Colorado. 51 pp.

³ Canada Lynx Final Recovery Plan pp. 26

⁴ Canada Lynx Final Recovery Plan pp. 31

⁵ 16 U.S.C. § 1531 et seq.

⁶ SRLA ROD 2008, attachment 1-6

⁷ SRLA ROD 2008, attachment 1-7

While many of these conflicts at the human-wildlife interface are inherent to increasing recreation in the region, we urge the agency to recognize the vitality of the critical lynx habitat that encompasses the area of the proposed Sheep Mountain Traverse trail. Though it represents a fractional portion of suitable lynx habitat, high quality, undisturbed habitat is critical to ensure lynx continue to thrive in Colorado. As stated in the Recovery Plan, “Anthropogenic changes that permanently decrease lynx habitat will be additive to permanent losses of lynx habitat due to climate change.”⁸

Based on the findings of the Recovery Plan, newly proposed Critical Habitat, and the importance of maintaining lynx habitat connectivity, we strongly support Alternative 3, and the elimination of the proposed Sheep Mountain Traverse trail.

Land Management Concerns: Colorado Outdoor Recreation and Economy Act

As part of the Colorado Outdoor Recreation and Economy Act, the Sheep Mountain Special Management Area includes 21,663 acres of exceptional lands surrounding the Sheep Mountain and Hope Lake zone. According to the CORE Act legislation, the Special Management Area would be managed to “maintain or improve the wilderness character of the Special Management Area” and “its suitability for potential inclusion in the National Wilderness Preservation System.”⁹

The proposed CORE Act, and Sheep Mountain Special Management area prohibits “the use of motor vehicles, motorized equipment, or mechanical transport (other than as provided in paragraph (3))¹⁰” With current boundaries and as currently written, this provision would severely limit the ability of mechanized or motorized trail construction on the proposed “Sheep Mountain Traverse” trail.

The Sheep Mountain Special Management Area is an amazing example of a community-led conservation proposal. The current boundary of the proposed Sheep Mountain Special Management Area of the CORE Act is from the 2005 Mountains to Mesas conservation management alternative. This plan was created from conservation groups across Colorado as a response to the 2005 GMUG forest plan revision. Originally titled “San Miguel,” at 10,394 acres, it was described as “As part of a large roadless complex that includes land on the adjacent San Juan National Forest, the San Miguel area exhibits a pristine alpine environment. Open meadows, brilliant wildflowers, steep slopes, jagged peaks, clear lakes and streams, and diverse wildlife, including Canada lynx, are all represented. The area offers excellent opportunities for solitude and quiet-use recreational activities.”

Option A and Option B

We appreciate the two options that are presented in the proposal. While Option A has implications with longstanding, community supported public land legislation, Option B skirts the border. Boundaries are many times political or placed at certain distances from existing trails and roads, and wildlife certainly does not discriminate against boundaries of a proposed special management area. Despite avoiding conflict with the proposed boundary, Option B remains in conflict with critical lynx habitat, which is a considerable concern for Sheep Mountain Alliance.

⁸ Canada Lynx Final Recovery Plan pp. 26

⁹ Congress.gov. "H.R.823 - 116th Congress (2019-2020): Colorado Outdoor Recreation and Economy Act." November 18, 2020. <https://www.congress.gov/bill/116th-congress/house-bill/823>.

¹⁰ "Text - S.1634 - 118th Congress (2023-2024): Colorado Outdoor Recreation and Economy Act." Congress.gov, Library of Congress, 17 May 2023, <https://www.congress.gov/bill/118th-congress/senate-bill/1634/text>.

In the case that the construction of the Sheep Mountain Traverse trail proceeds, we strongly prefer Option B. By avoiding direct conflict with the CORE Act, Option B allows for a more resilient trail infrastructure for if—and when—the CORE Act is passed. However, it is difficult to see a path forward for this specific trail given the implications with the strongly supported CORE Act legislation, and the numerous impacts to Canada Lynx habitat. As such, we strongly support Option 3.

Specific Trail Comments

Sheep Mountain Alliance has a couple of specific concerns regarding additional trails, as outlined below.

Mountain Village to Valley Floor Singletrack Connector

The new connector trail would further fragment wildlife habitat on the USFS Wedge parcel, and we understand that this zone is heavily used by elk as a movement corridor between the Valley Floor and Mountain Village. As well, this zone includes newly proposed critical lynx habitat. We request that trail design and development keep these wildlife populations in mind.

Sunshine Uphill trail

As the Sunshine downhill trail has unfortunately turned into a less than ideal trail for user groups outside of mountain bikers, our primary concern is ensuring that it provides recreational opportunities for a spectrum of users, including pedestrians as well as mountain bikers. Erosion issues are also a concern, and trail design must consider this as well. We strongly support keeping the proposed uphill trail multi-use in purpose and design.

South Side perimeter trail - Bridal Veil to Town Park

The South Side perimeter trail from Bridal Veil to Town Park presents very few concerns for SMA. In fact, we believe this trail would be an excellent addition to the in-town trail systems. It will provide greater connectivity between trail systems, and is within a highly trafficked area near Telluride. Its limited wildlife values present few conservation concerns. Clear signage and a sustainable build will be integral to the suitability of this trail. We do not have a preference between Option A and Option B.

Infrastructure

Signage

The population in Telluride is approximately 30% Spanish-speaking. To foster accessibility and belonging for all members of our community, we strongly suggest that signage for all newly constructed trails be available in English and Spanish. Including bilingual information about trail etiquette, leave no trace principles, e-bike suitability, and clear directions will also ensure the best possible experience for users and minimize environmental impacts associated with increased use.

Sincerely,

Ruthie Boyd
Program Director
Sheep Mountain Alliance