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Megan Eno  
Norwood Ranger District  
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### **San Juan Citizens Alliance Comments on Telluride Mountain Club Trails Proposal EA**

Dear District Ranger Eno,

Thank you for the opportunity to comment on the draft Environmental Assessment for the Telluride Mountain Club (TMTc) Trails Proposal. The San Juan Citizens Alliance is a member based non-profit conservation organization that advocates for public lands, wildlife, clean air, and pure water in the San Juans. Our members often recreate in the project area and appreciate access to high quality non-motorized trails in the Norwood Ranger District. We are grateful for TMTc's public outreach regarding these proposed trails and their mission to provide sustainable recreation opportunities for the public, and for the Forest Service's thorough public engagement.

In the interests of providing sustainable recreation opportunities and minimizing impacts to important public resources like wildlife habitat, we urge you to adopt Alternative 3 – Elimination of Sheep Mountain Traverse. While we generally support the proposal, we have concerns with the potential impacts the Sheep Mountain Traverse trail would have on wildlife habitat, wetland and soil resources, and the Sheep Mountain Special Management Area proposed in the Colorado Outdoor Recreation and Economy (CORE) Act.

As noted in the EA, both alignment options for the Sheep Mountain Traverse trail fall entirely within the Lizard Head Pass lynx linkage area, designated by the Forest Service and partners to provide lynx habitat connectivity between the San Miguel Mountains and the broader San Juan range. Adopting Alternative 3 and eliminating the Sheep Mountain Traverse trail would remove about 1.8 acres of impacts to lynx habitat, reducing disturbance contemplated in the preferred alternative by about a third.

We recognize that all alternatives considered would disturb small fractions of available habitat in the effected Lynx Analysis Units. However, we emphasize the importance of reducing

disturbance and avoidance behavior in linkage areas given the objectives of the 2008 Southern Rockies Lynx Amendment, 2024 Lynx Final Recovery Plan, and the recent FWS proposed critical habitat designation. The proposed habitat designation would add 7,679 miles of critical lynx habitat to the Southern Rockies region and overlap the entirety of the Sheep Mountain Traverse.

Furthermore, the Sheep Mountain Traverse trail would overlap the Sheep Mountain Special Management Area proposed in the CORE Act, which was recently reintroduced in Congress. Finally, eliminating the Sheep Mountain Traverse would reduce impacts to wetlands by about 0.88 acres, which would be difficult or impossible to avoid through field fitting or spanning, while reducing impacts to soils by about 6.2 acres.

We appreciate that the Forest Service identified these issues in scoping, considered them in the EA, and developed an alternative to address these concerns. We urge you to adopt Alternative 3 to reduce these anticipated impacts. SJCA supports the intent of TMtC's proposal to expand sustainable recreation opportunities on our national forests, and the proposed non-motorize trail additions/reconstructions apart from the Sheep Mountain Traverse. Thank you for your outreach and attention to these issues.

Sincerely,

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