



San Miguel County Board of Commissioners

Anne Brown | Lance Waring | Galena Gleason

April 2, 2025

USFS - Norwood Ranger District
Krystina Smith
PO Box 388
Norwood, CO
81423

Transmitted via email to krystina.smith@usda.gov and
<https://cara.fs2c.usda.gov/Public/CommentInput?Project=65616>
RE: Draft Environmental Assessment for Telluride Mountain Club Trails Proposal Project

Dear Ms. Smith,

The Board of County Commissioners (BOCC) of San Miguel County, Colorado (County) appreciates the opportunity to provide comments for the Telluride Mountain Club's (TMC) Trails Proposal. The BOCC supports Alternative 2 - Option B, with a suggested amendment in consideration due to hydrological concerns.

We appreciate the Mountain Club's commitment to recreation in the County's East End. They have organized, fundraised, and grown their organization to fill the leadership role needed to manage the Telluride Via Ferrata, successfully maintain existing trails, and plan for future trails development in the region.

The County leads a Recreation Round Table, which regularly brings interested parties together to discuss recreation development, trails, and e-bike usage. TMC has participated in all these meetings, providing updates on the progress of their Trails Proposal. We commend them for their dedication to the process by fundraising every dollar toward this effort, assisting in trail map development, and being involved in the GMUG Forest Plan to ensure their proposal was acknowledged and in compliance with the new plan.

Trail maintenance is a concern when considering new trail development. TMC has proven its expertise, commitment and investment by hiring a trails specialist who communicates with the public, leads volunteer days, designs trails, and assists the USFS by clearing trails for public safety. Additionally, we appreciate TMC's efforts in creating and distributing a trails survey to better understand the wants and needs of the East End of San Miguel County, informing this proposal.

The County has financially supported TMC and assisted with trail planning efforts. Our Parks and Open Space Department and our Open Space Commission have been actively involved with the Perimeter Trail, which will be designated as a County trail. In addition, the County's Historical Commission has been working closely with the USFS and has essentially been the driver for the historic Ilium Flume Trail.

The County supports Alternative 2, Option B, as it encompasses additional trail opportunities accessible by local residents and visitors outside of Telluride and Mountain Village. If implemented, trail users would have the opportunity to utilize the proposed trails to access the towns as well as recreate closer to their residences. These actions would contribute to a reduction in vehicular travel and greenhouse gas emissions. Much of our affordable workforce housing has been developed and planned outside Town limits. Our *Regional Climate Action Plan* states, “Vehicle emissions have increased significantly since our 2010 baseline, by approximately 24%. This is mainly associated with an increase in our economy. Commuting workers, services of trades people, and a decrease in local affordable housing have increased the amount of workforce-related vehicle transportation. The region has also experienced increased tourism, with noticeable visitor and service-related traffic increases throughout the year. During the 2020 and 2021 summer season, as people flocked away from cities, campers, motorhomes, and similar vehicles became more prevalent. Jeep and OHV traffic has also been increasing, which is difficult to quantitatively capture in our emissions calculations due to the remote nature of the roads they travel. As demand for parking grows, development of additional infrastructure is needed.”¹ This Environmental Assessment acknowledges and addresses the above concerns in *Table 1.4-2. Resources and Issues Not Carried Forward, Climate and Climate Change* states, “the proposed trails may be used for multimodal transportation, thus reducing regional greenhouse gas emissions by providing an alternative to motor vehicle transportation.”

Additionally, the County has been a long-time supporter of the CORE Act and appreciates the inclusion of the Sheep Mountain Traverse trail in Option B, outside of the potential Sheep Mountain Special Management Area. We see this area continuing to grow, with the future affordable housing project and the USFS campground expansion, it’s essential to plan for additional opportunities and disperse recreation. This trail concept is consistent with the following comments made by the County on the GMUG Forest Plan.

For example, the San Bernardo and Yellow Mountain WMAs are surrounded by multiple HOAs, USFS-designated and dispersed camping (Matterhorn Campground, which will soon be expanded), and current and future deed-restricted housing (the County recently purchased the Pathfinder property for affordable housing), Trout Lake (a popular recreation area) and access to Lizard Head Pass, Hope Lake, and other existing trails in a densely populated area as a stand-alone trail through an already disturbed area, serving the residents and visitors of San Miguel County. These WMAs are excellent examples of how each polygon should be managed site-specific.

¹ SAN MIGUEL & OURAY COUNTY Regional Climate Action Plan
https://static1.squarespace.com/static/52a753f8e4b049b53e3f219b/t/63eebecaffe4233ffe64122d/1676590805728/EAP_Regional+CAP.FINAL_2023.pdf

This area would be an ideal location for additional trails to serve residents and visitors while also considering climate impacts; nearby trails and campgrounds reduce vehicle miles traveled to access trailheads, thus reducing greenhouse gas emissions. When trails can be accessed from homes and campgrounds, this also means fewer facilities, such as parking lots and restrooms need to be provided by the agency.

Suggestion: With all of these items in mind, a future non-motorized trail loop originating from the campground would be an excellent addition to this area when the infrastructure is in place and NEPA has been analyzed. However, because of the blanket trail density model, the best alignment and trail plan for this polygon would likely not be possible. The need for trails in this specific area is obvious and can be seen by way of user-created trails. The USFS can eliminate future user-created trails and provide more opportunities in these already-established heavily used recreation areas.

We acknowledge the hydrological impacts of Alternative 2 - Option B on the sensitive ecosystems. As Option B is currently aligned, it faces challenges with 7-9 wetland encounters, including potential and existing fens, creating a total of .49 acres of permanent and temporary wetland impacts. We support avoiding any permanent wetland damage and the fens in Figure 1 below, as these fragile ecosystems are vulnerable to disturbance and difficult to restore.

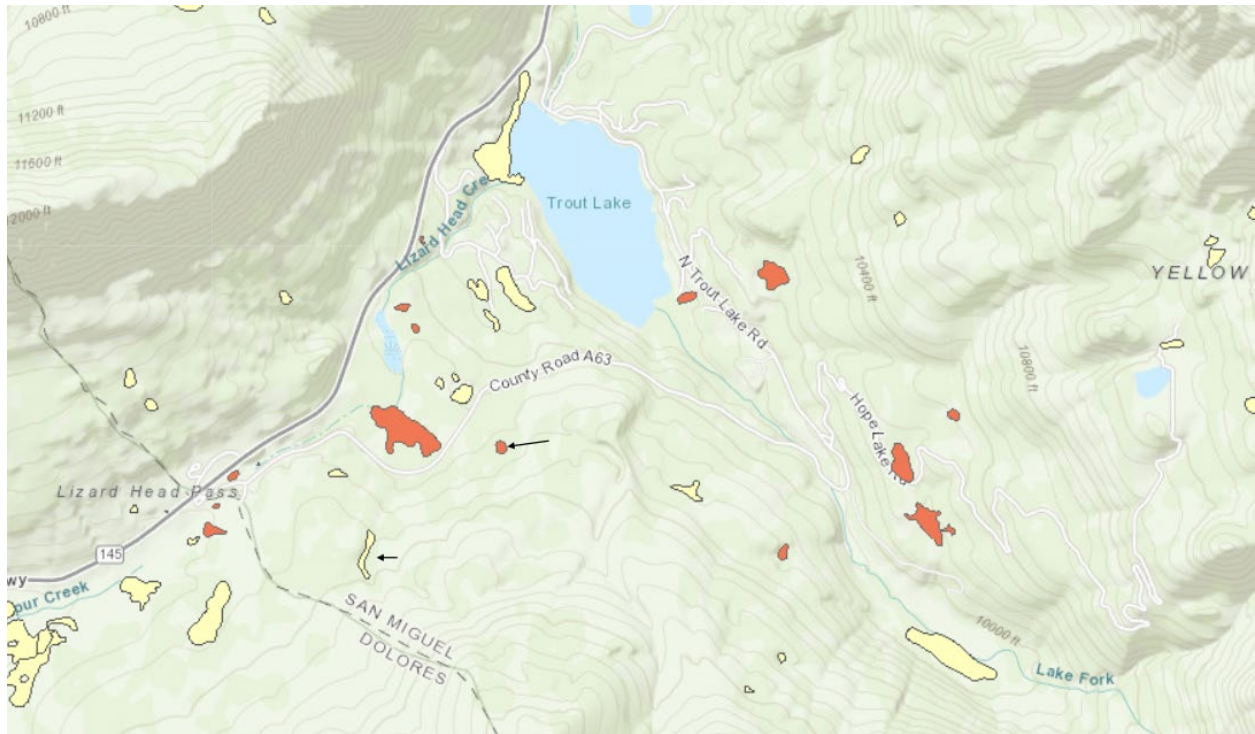
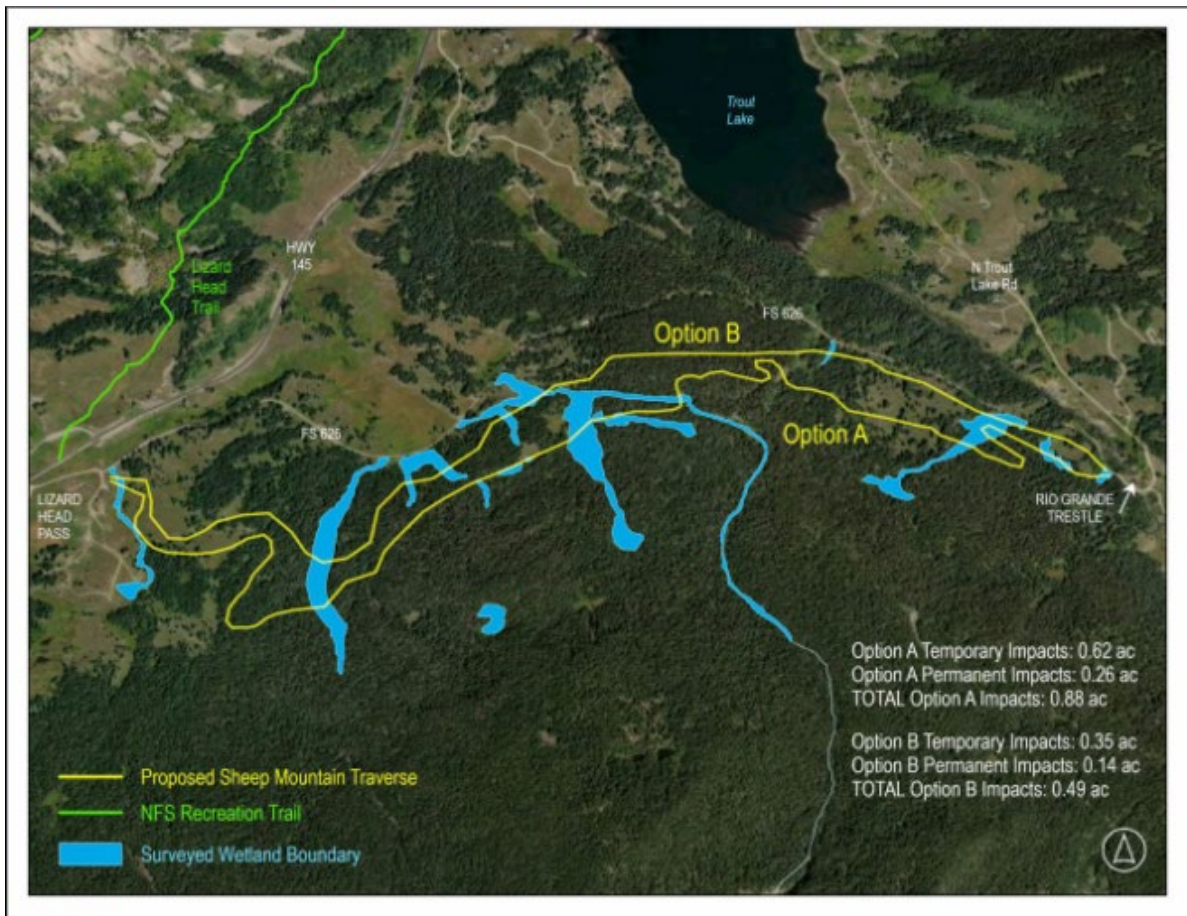


Figure 1- Fens potentially impacted by Alternative 2 - Option B



RME 2024c

Figure 2 - Alternative 2 - Option B: temporary and permanent wetland impacts

If Option B cannot be realigned to avoid these fens and protect sensitive wetland ecosystems from .14 acres of permanent impacts, we recommend analyzing a different location near Trout and Priest lakes. In consideration of a realignment, we have the following suggestions and requests:

- Any wetland disturbance would require a San Miguel County Special Uses Wetland Permit.
- Consider a new trail alignment as a multi-benefit for wildfire mitigation in the WUI. The EA states, “the proposed trails would also be designed to minimize erosion and potentially serve as fire breaks; in the event that flood and wildfire conditions become more severe than historical conditions in the region due to climate change, these design strategies could help maintain trail infrastructure and protect the wildland-urban interface.” Our comments in the Forest Plan stated, “We also ask that the GMUG establish a formal prioritization of WUI areas to improve safety and fire mitigation for communities around the GMUG.”
- Lower impact and disturbance by hand-building a trail in sensitive areas and wetlands.

- Use of the most environmentally friendly trail technique for wetland crossings. Consider adding the following document: Wetland Trail Design and Construction: 2007 Edition²

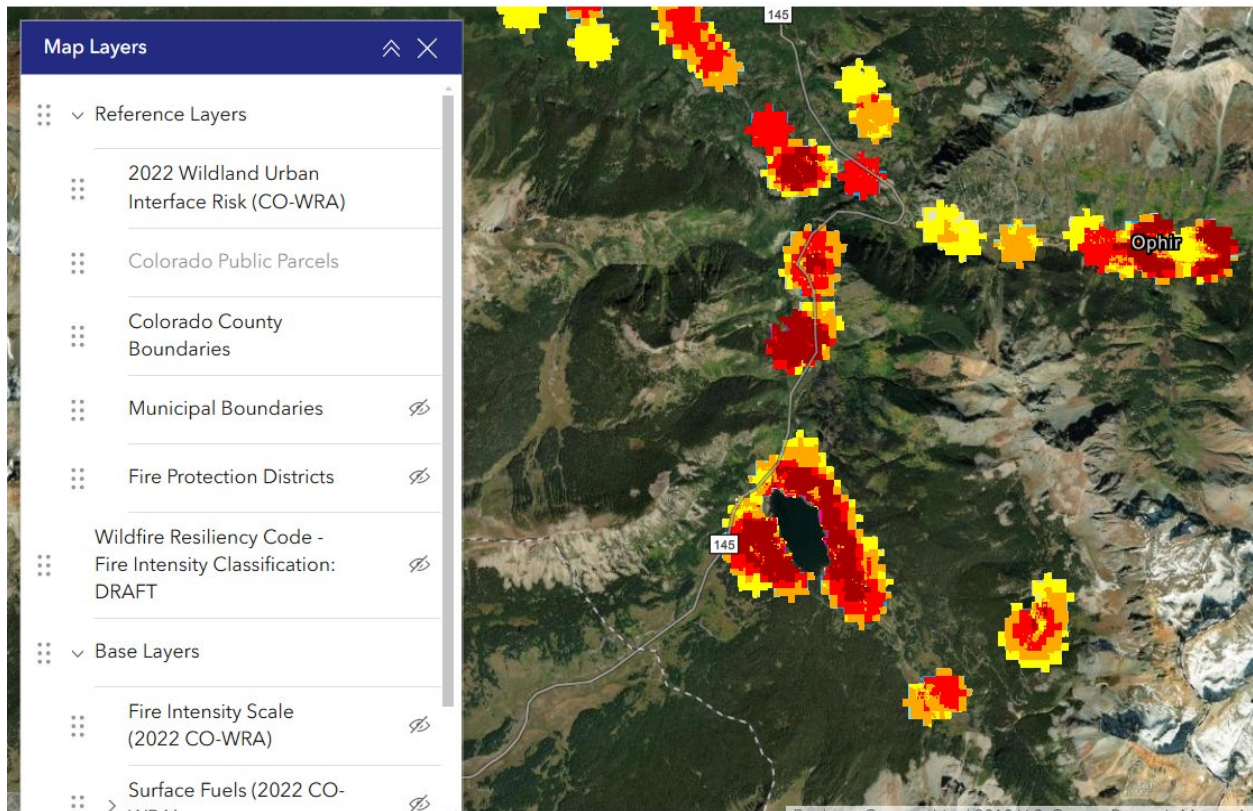


Figure 3 - Colorado WUI maps

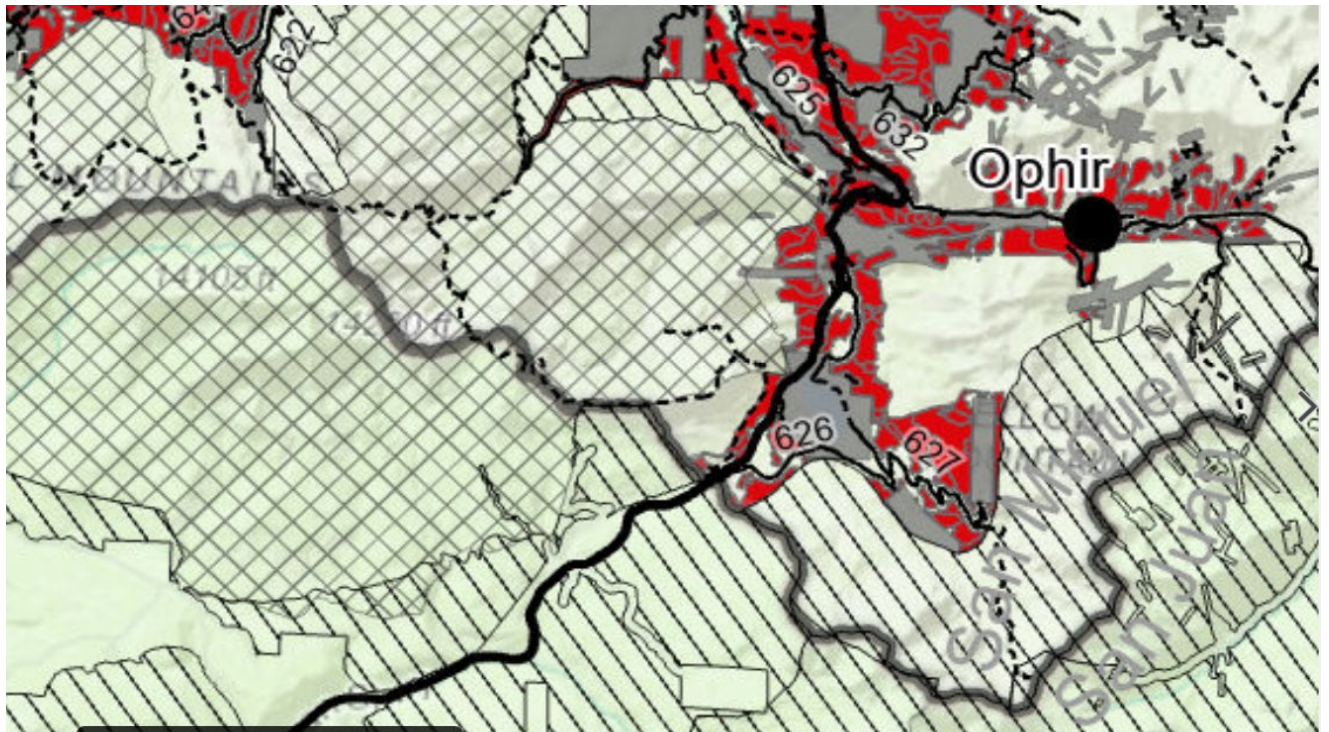


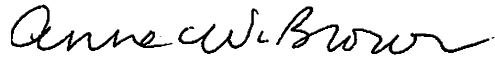
Figure 4 - USFS Forest Plan suitable timber map

² USDA Wetland Trail Structures <https://www.fs.usda.gov/t-d/pubs/htmlpubs/htm07232804/page05.htm#:~:text=At%20least%20eight%20types,structures%20are%20built%20of%20wood.>

Thank you for the opportunity to comment, and we look forward to supporting future trail development in San Miguel County.

Sincerely,

San Miguel County Board of Commissioners

A handwritten signature in cursive script, reading "Anne W. Brown".

Anne Brown, Chair

A handwritten signature in cursive script, reading "Lance Waring".

Lance Waring, Vice Chair

A handwritten signature in cursive script, reading "Galena Gleason".

Galena Gleason, Commissioner