



BOARD OF COMMISSIONERS

Anne Brown | Lance Waring | Galena Gleason

May 11, 2026

Scott Spielman
United States Forest Service
2250 South Main Street
Delta, CO 81416

RE: Telluride Ski Resort Improvements Environmental Assessment

Dear Mr. Spielman,

Thank you for the opportunity to provide comments to the U.S. Forest Service on the Telluride Ski Resort Improvements Draft Environmental Assessment (DEA). The Telluride Ski Resort has been and will continue to be a significant economic contributor to the region. San Miguel County understands the costs and effort required to make these significant improvements; therefore, we appreciate the investment Telluride Ski and Golf (TSG) has proposed for the ski resort.

Overall, with all the projects, TSG needs to comply with local regulations for logging and permitting for the construction of facilities (other than lifts).

Following are our comments for the DEA comment period:

- 1) High Camp Restaurant
 - A) Expansion to on-mountain dining and other facilities should be supported by adequate utilities prior to the issuance of building permits.
 - B) Future on-mountain projects should secure materials and construction waste on-site to minimize foam paneling, plastic wrap, and other debris from blowing around or being washed away by rain. Poly foam has frequently been found in the Bear Creek drainage, on the Wasatch Trail below Giuseppe's, Lift 9, and at other building sites.
 - C) Water needs for a full-service restaurant are exponentially greater than the current use. Water will be transported to the site, but the quantity (% increase) or source has not been disclosed.
 - D) Composting toilets are mentioned, but wastewater, food waste, septic, and sanitation needs for a full-service restaurant are not disclosed.
 - E) We were not aware that the Miller Settlement agreement had an expiration date.

2) Tethered Logging/Lift Replacement 7 and 8/Green Tech Mountain Bike Trail

- A) According to the DEA, Lynx habitat will be permanently converted to non-habitat due to the lift replacements and tethered logging operations. The Project Design Criteria states that a USFS staff person will be on-site to select trees and ensure habitat is maintained, but it is unclear whether the USFS actually consulted the USFWS for these projects. A USFWS database is mentioned, but there is no mention of consulting with agency staff. Section 7(a)(2) of the Endangered Species Act requires the agencies to ensure their activities are not likely to jeopardize the continued existence of federally listed species or destroy or adversely modify designated critical habitat. Section 7(a)(2) of the ESA applies to all actions federal agencies fund, authorize, permit, or carry out in which there is discretionary federal involvement or control. If the proposed action may affect any listed species or critical habitat, then the agency must begin a formal consultation, unless the agency determines, with written concurrence of the Service, that the action is not likely to adversely affect listed species or critical habitat.¹
 - B) Wetlands should be completely avoided in implementing tethered logging for glades, trails, and other vegetation management.
 - C) According to the DEA, “The Telluride Bike Park consists of a network of gravity-fed, lift-served downhill mountain bike trails spanning NFS and private lands within and outside the TSR SUP area. TSR maintains multi-use cross-country mountain biking and hiking trails that connect to trails outside of the ski resort.” The DEA states that TSR maintains the trails that are not part of the Bike Park. With the Bike Park not opening, who will maintain the trails outside the Bike Park when TSG is not operating it, and will it be guaranteed that these trails will stay open this summer?
- 3) To the extent it is safe, TSG should maintain public access to lands, trails, recreation opportunities, and events throughout the replacement/logging/building processes.
- A) According to the DEA, “summer trails are present in approved logging areas, recreational impacts would be limited to temporary trail closures during active work. The Telluride community is accustomed to this type of work occurring at TSR during the summer.” To be clear, the public has not been ok with these closures. Public lands should remain accessible via reroutes, detours, or on-site personnel to ensure visitors can pass through safely during all projects. Additionally, it is vital that local races/events that have historically used the ski area maintain access. This access will be extremely important during the summers when the bike park is closed. Given the existing economic strain from the winter shutdown and the bike park closure, trails and races that drive tourism must remain open.

¹ U.S. Fish and Wildlife Service. Retrieved May 7, 2026. <https://www.fws.gov/service/esa-section-7-consultation>

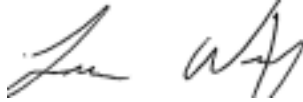
Thank you for your time and consideration.

Sincerely,

San Miguel County
Board of County Commissioners



Anne Brown, Chair
District 1



Lance Waring
District 2



Galena Gleason
District 3