



**Sheep
Mountain
Alliance**

PO Box 389, Telluride, CO 81435 • 970-728-3729 • www.sheepmountainalliance.org

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

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Comments on Telluride Ski Resort Improvements EA

Sheep Mountain Alliance (SMA) offers the following scoping comments on the proposed Telluride Ski Resort (TSR) project to implement a suite of proposed projects identified in the resort's 2017 Master Development Plan (MDP) and subsequent 2023 & 2024 MDP amendments 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 Ski Resort and the U.S. Forest Service for working with us over the past few months to discuss the proposal, particularly given unprecedented challenges at the federal level. In our comments, we address specific concerns that we have regarding impacts to vegetation and wildlife, considerations about infrastructure, and the range of alternatives to be considered. We suggest providing additional alternatives that include reducing the acreage of tethered logging and glading to account for impacts to wildlife, and express our interest in coming to the table to negotiate the expansion of High Camp into a restaurant as this action is currently unallowed per the 2001 settlement agreement.

I. Cumulative Impacts of Telluride Ski Resort Improvements

The improvements outlined in the Scoping Letter would kick off lift improvements for Lifts 7 and 8, expand High Camp into a full restaurant, create a new bike trail, and conduct tethered logging and glading on numerous areas in the boundaries of Telluride Ski Resort. Some of these projects improve existing infrastructure, adding amenities for Telluride Ski Resort guests that improve resort functionality and safety, and bolster the overall experience for guests on this landscape. However, other proposed improvements present substantial environmental impacts without providing substantial justification for their needs or details about how impacts would be mitigated.

Sheep Mountain Alliance is generally supportive of human-powered recreation, and is eager to ensure that recreation is practiced in appropriate areas. New infrastructure and infrastructure updates that are subject to appropriate environmental review will most succinctly and thoroughly assess compatibility with wildlife and other resource values. To ensure that environmental information is available to public officials and citizens before decisions are made and before actions are taken, the Forest Service must disclose all impacts of this proposed project. This includes direct, indirect, and cumulative impacts (or effects) the proposed project may have, as well as connected, cumulative, and similar actions.

In addition to examining the direct impacts of the proposal, which may be localized to the area immediately surrounding the new trail construction, the agency has an obligation to analyze impacts that extend beyond the immediate, physically evident, on-the-ground effects of the new trails. These indirect and cumulative impacts may include effects related to changes in the pattern of land use, changed recreation patterns across the regional landscape, and related effects to ecosystems, wildlife, and other natural systems. Increased lift capacity, year-round utilization of a new zone for biking, and extensive vegetation clearing create concerns for SMA regarding the vitality of the natural environment within the ski area boundary.

Improving Telluride Ski Resort's functionality is desirable. However, doing so necessitates closely examining the additional impacts to wildlife, implications in our changing climate, and forest composition changes. It is essential that the agency carefully examine the direct, indirect, and cumulative impacts from this proposal.

II. Environmental Impact Statement

Due to the many aspects and impacts of the proposal from Telluride Ski Resort (TSR), an Environmental Impact Statement ("EIS") must be completed. Past NEPA regulations dictate that impacts are assessed based on their "context" and "intensity." 40 C.F.R. § 1508.27(a)-(b). The "intensity" factors included: impacts to threatened species, public health and safety, and areas with "unique characteristics," beneficial effects, controversial actions and their impacts, actions with uncertain or unknown risks, and actions that threaten violations of Federal or State law. 40 C.F.R. § 1508.27(b). Agencies must analyze and disclose all "direct," "indirect," and "cumulative" impacts of its actions as well as impacts of "connected actions." *Id.* § 1508.7, 1808.8(a) & (b), 1508.25(a) & (c), *see also* Middle Rio Grande Conservancy Dist. v. Norton, 294 F.3d 1220, 1224 (10th Cir. 2002) (EIS required when possibility of significant impacts exists); Ocean Advocates v. Army Corps of Eng'rs, 402 F.3d 846, 864 (9th Cir. 2005) (EIS required if there are "substantial questions" that project "may cause significant degradation") (emphasis in original).

The actions under review must be considered cumulatively and involve impacts to the federally listed Canada lynx, involve novel forestry practices not analyzed in past NEPA documents, are in violation of a Federal Court approved Settlement Agreement, and will impact areas with rare and unique forest characteristics. The chairlift upgrades will double the uphill capacity for parts of the ski mountain. Analysis of how this will impact the resort's safety, functioning, and the overall impacts must be disclosed and considered by the decision-maker. For these reasons, the actions proposed by TSR may cause significant impacts and an EIS must be completed prior to approval.

III. 2001 Settlement Agreement

Colorado Wild¹ and Sheep Mountain Alliance are parties to the 2001 Settlement Agreement with Telluride Ski Resort and the Forest Service and do not approve of the contemplated breach of that agreement. A settlement agreement is considered a contract between the parties and contract law binds both parties to the obligations contained within the agreement. The parties to this contract both gave up rights and gained benefits that acted as consideration resulting in its enforceability. The Settlement Agreement does not contain a provision allowing for the passing of time to void its force, nor do the "changes around the resort" or "the desires of resort guests" impact the parties obligations. The High Camp restaurant expansion is a clear breach of the Settlement Agreement and without proper conferral and a possible modification of this agreement, this aspect of the proposal is unlawful. SMA and Rocky Mountain Wild are not opposed in principle to the expansion of High Camp, recognizing its utility as an

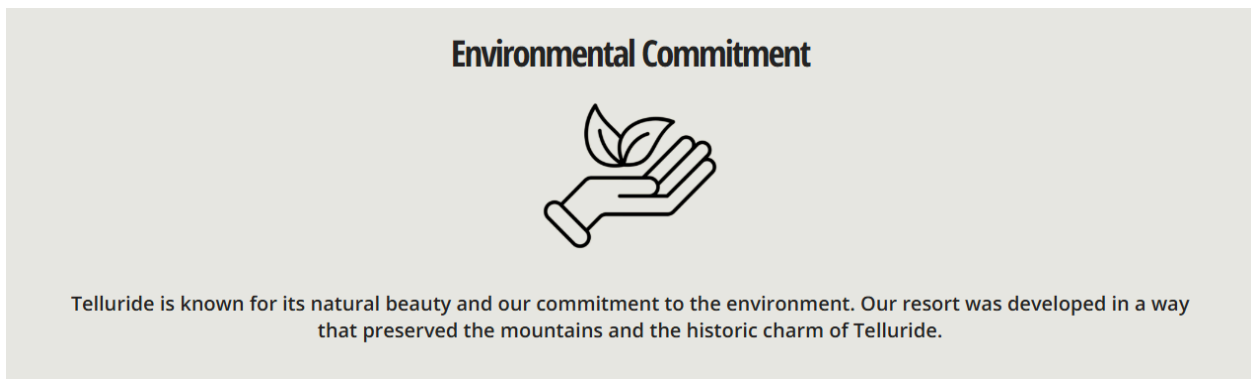
¹ Rocky Mountain Wild is the successor in interest of Colorado Wild. Rocky Mountain Wild was created through the merger of Colorado Wild and Center for Native Ecosystems.

additional resource for guests and employees to access food on the ski resort. We welcome conferral about the agreement and a possible modification of this agreement, including alternative conservation and/or educational terms, that satisfies both parties.

IV. Conservation Alternative

We are requesting that the NEPA document analyze a conservation alternative that includes minimized glading or tree cutting, reduced impacts from development, and increased lynx conservation efforts. This alternative would align with Telluride Ski Resort’s “Environmental Commitment” which they announce on their website.

While each individual project proposed may not have overly concerning impacts, cumulatively the impacts are consequential. These cumulative impacts must be analyzed. The conservation alternative must seek to reduce timber operations which will minimize the impacts on Canada lynx habitat. The conservation alternative should also include mitigation to counterbalance the impacts of the proposed projects. The mitigation must focus on lynx conservation, balancing of energy needs, waste minimization, and other efforts to remedy the negative impacts of the proposals. TSR’s website explicitly notes its “commitment to the environment” (see image and link below). We look forward to seeing TSR’s actions back up the public statements on its website.



See [Telluride Ski & Golf | Premier Mountain Resort in North America](#)

V. Detailed Concerns and Considerations

A. Limit Proposed Forest Health Treatments

The GMUG Forest Plan has some direction for vegetation management at ski areas, in Management Area 4.1, Mountain Resorts. Part of Desired Condition MA-DC-MTR-02 states:

Forested areas are managed as sustainable cover with a variety of species and age classes in patterns typical of the natural landscape character of the area. Disturbed areas are revegetated to protect scenery and minimize erosion.

Guideline MA-GDL-MTR-09 states:

To maintain high-quality scenery and recreational values in mountain resorts, and to sustainably achieve snow management objectives, stands and islands of trees should be managed to provide for a variety of species and size classes that perpetuate forest cover. Vegetative management should complement snow management objectives, scenery

objectives, and recreation values, including the desired recreation opportunity spectrum (ROS) setting.

Forest Plan at 123, 124.

The natural landscape character of the area is likely Engelmann spruce-subalpine fir stands in various age and size classes. Some aspen, mostly mature, may also be present. The spruce bark beetle epidemic has affected the tree stands at the ski area, but subalpine fir are at worst minimally affected by the beetle. Trees of those species should generally be maintained, as should any live spruce.

One of the needs for the proposed project is stated to be: “Promote forest health and resilience through selective vegetation removal (glading)...”. Scoping Letter (SL) (dated April 30, 2025) at 1. The map associated with the SL shows numerous areas where this treatment might occur. The SL does not describe what vegetation types exist in the project area and might be subject to forest health-type treatments, nor what kinds of treatments might be implemented. Based on the elevation and location in the San Juan Mountains, we will assume that much of the vegetation is composed of Engelmann spruce-subalpine fir type.

We have various concerns with the proposed vegetation removal, as discussed below.

A. Trees are needed at a ski area to ensure proper distribution of snow. Standing trees, even dead ones, help reduce snow scour by trapping or reducing the movement of snow. Wind during and after snowstorms could scour all or most of the snow from large open areas. Thus it is important to retain some trees in areas between ski runs.

B. Coarse woody debris is needed to trap snow, protect soil, and maintain habitat. Down dead logs (part of coarse woody debris) reduce soil erosion and trap some snow, resulting in an input of moisture during spring melt. Removing the down dead logs would increase snow scour by decreasing surface roughness.

Down dead material also provides habitat for small mammals, such as the southern red-backed vole (*Clethrionomys gapperi*), which is the chief prey of boreal owl (*Aegolius funereus*). Down dead structure is very important winter habitat for marten (*Martes Americana*) and provides denning areas for lynx (*Lynx Canadensis*). Many other wildlife and insect species benefit from coarse woody debris.

Finally, down dead material slowly decays into new soil.

A study by Brown et al, 2003 identified the optimum CWD level as “10 to 30 tons per acre for cool Douglas-fir and lodgepole pine types and lower subalpine fir types,” provided no more than five tons per acre of smaller diameter (3-6 inches) fuel is present. Id. at 8.²

Most down dead material should be retained, especially the larger pieces, if the total CWD level is generally within the range specified by Brown et al.

C. Extensive fuel reduction at the ski area is not needed. Ski runs, lift corridors, roads, and other clearings form fire breaks. Vegetation in these open areas would burn only as a ground fire, and would be unlikely to cause spot fires. Thus locations away from the wildland-urban interface areas of Telluride and Mountain Village and not near lifts or other infrastructure, at least, generally do not need fuel treatment.

² Brown, James K., Elizabeth D. Reinhardt, and Kylie A. Kramer, 2003. Coarse Woody Debris: Managing Benefits and Fire Hazard in the Recovering Forest. USDA Forest Service RMRS-GTR-105.

D. Most standing dead Engelmann spruce need not be removed. Unlike other conifer tree species native to Colorado, Engelmann spruce, if sound when killed by bark beetles, do not decay rapidly or fall over soon after death. Rather, they harden after death and can remain standing for decades. Thus most of them should be retained.

E. The proposed logging and glading would reduce wildlife habitat effectiveness. The SL describes “tethered logging”, in which logging equipment would create trails as it works its way through stands. Id. at 3. It further states that “[t]rails are typically established 60 feet apart”. Id. at 4.

Any of these paths could be used by skiers and maybe even by bikers in the summer. Facilitating entry by humans would reduce the effectiveness of any wildlife habitat. This includes lynx, which typically bed down during the day, or part of it, and then are active at night. If they are continually roused out of their habitat, the habitat could become useless.

These trails would be in addition to creation of the proposed glades, which we assume would entail thinning of between-run tree islands. Glading would remove cover for wildlife and reduce the habitat value. Generally, glading is not needed and should not be implemented.

Placing tops and limbs on the soil for the log harvesters and forwarders to travel over, as described at SL p. 3-4, may reduce soil erosion, but the soil will still get heavily compacted. This means that vegetation will not likely grow on these trails, and any vegetation that does establish will mostly be non-native weed species. Thus the trails created by the proposed logging would remain on the landscape.

If vegetation treatment is approved and implemented as proposed, the trails used by logging equipment must be blocked. That will require placement of logs, boulders, and/or other material that will protrude far enough out of the snow at maximum depth to prevent or at least discourage use by skiers.

F. Logging would result in death of existing small trees. The tree islands at the ski resort likely have some small trees, primarily subalpine fir at higher elevations, and maybe Douglas-fir in some of the lower-elevation units. These trees are the future mature forest and need to be retained. However, the use of heavy logging equipment will trample, break, or uproot many of the young trees. It may result in damage to pole-sized trees, with equipment bruising trees and creating entry points for fungi, which will cause trees to decay and die. See direction from the Forest Plan below. The less cutting, the less damage to understory trees.

G. Protect and retain lynx habitat. The proposed vegetation management could adversely affect lynx habitat. See detailed discussion below.

H. Retain Stand windfirmness. Regardless of structure and age-class distribution, trees growing in any stand develop wind firmness as a unit. That is, they rely on each other to deflect the often strong winds that frequent Colorado. Thus removal of any trees can adversely affect the wind firmness of the entire stand.

Before any cuts of overstory trees are approved, each potential cutting unit should be assessed for wind firmness, and any silvicultural prescriptions must be designed to minimize the possibility of blowdown. As with other impacts, risks to stand wind firmness are reduced with less tree removal.

I (eye). The impacts of tethered logging need to be analyzed and disclosed, especially on steep slopes. Veg mgt is proposed in areas with steep slopes, such as in the prospect and Gold Hill pods. Any use of heavy equipment on steep slopes can be dangerous to the operators and also can cause detrimental effects to soils.

The SL observes that:

SBEADMR prohibited the use of ground skidding on slopes steeper than 40% but did not specifically analyze the use of tethered cut-to-length harvest on steep slopes.

SL at 3.

The impacts of tethered logging must be fully analyzed and disclosed in the NEPA document for the project.

Any treatment in the project area should be fairly light, in order to retain the values associated with tree cover (live and dead), with woody debris between ski runs, and also to retain wind firmness. Standing live and dead trees and the larger pieces of down dead woody should generally be retained.

Cutting and removal of vegetation should be limited to:

- cuts for public safety, such as dead trees that could fall onto ski runs or near lifts or other structures;
- fuel reduction in areas where there is heavy fuel accumulation adjacent to structures;
- treatment of recent (less than two years old) Engelmann spruce blowdown and falldown to prevent development of new populations of spruce bark beetles; and
- treatment that would help create, maintain, or enhance the generation and growth of young trees in lynx habitat.

B. Protect and Retain Lynx Habitat

Lynx have previously been spotted at the ski resort. Numerous lynx detections have occurred in areas surrounding the ski area. See Figure 4 in CDOW, 2005.³ Thus it is reasonable to assume that some of the area between ski runs is lynx habitat, as lynx likely pass through the ski area at times.

There may be numerous small trees or larger ones with low branches that extend a meter or more from the snowpack and provide dense horizontal cover (DHC). This is habitat for snowshoe hare (*Lepus Americanus*), lynx' favorite prey. The predictive model for lynx use on the GMUG National Forest shows that stands at the Telluride Ski Resort have moderate DHC. Biological Assessment for the recently revised Forest Plan (hereafter "BA") at 69.

A recent study on the adjacent Rio Grande National Forest⁴ showed that lynx used areas with standing dead trees. See Squires et al, 2020. As the BA put it,

³ CDOW, 2005. General Locations of Lynx (*Lynx canadensis*) Reintroduced to Southwestern Colorado from February 4, 1999 through February 1, 2005. Report prepared for the Colorado Division of Wildlife (now the Colorado Division of Parks and Wildlife), April, 2005.

⁴ A small portion of the study, 10,600 acres south and southwest of Lake City, was conducted on the GMUG National Forest. BA at 76.

Study results and mapping products demonstrated that forests with extensive overstory mortality are heterogenous in the subcanopy and not “dead” to Canada lynx.⁵

Id. at 72.

The BA noted that the Squires et al study offers the following management considerations, among others:

Efforts to reduce ladder fuels and fire risk that create high horizontal cover from spruce and fir subcanopies required by Canada lynx can be in conflict with existing lynx management direction...

Silvicultural prescriptions...

for tree salvage that best protect the existing spruce and subalpine fir understory and maintain the necessary shading needed to promote its development and restoration, would be most consistent with conservation of lynx habitat in spruce beetle-impacted forests.

Ibid; emphasis added.

The forest plan says the following lynx habitat components, among others, should be considered “when developing vegetation management prescriptions in all lynx habitat”:

--Understory conifers: Preserve understory, particularly subalpine fir and Engelmann spruce, in the sub-canopy.

--Size and basal area of dead trees: Sub-canopy development is reduced by salvage; thus, snag retention is most important in areas with high amounts of live understory.

--Shade retention: Dead trees and remaining live trees should be retained strategically to provide shade protection for developing understory trees.

--Retain and protect live subalpine fir from incidental damage.

Plan Management Approach FW-MA-SPEC 35.c, Plan at 52.

Destruction of or damage to the understory, which would be likely to occur with treatment as discussed above, could make some lynx habitat unsuitable. Standard Veg S1 in the Southern Rockies Lynx Amendment (SRLA) states that treatment that makes lynx habitat unsuitable must not be done in lynx analysis units (LAUs) where habitat is more than 30 percent unsuitable.⁶ Also, standard Veg S2 in SRLA allows no more than 15 percent of the lynx habitat in any LAU to be made unsuitable in any 10-year period. More than 30 percent of lynx habitat in some LAUs may already be unsuitable.

⁵ Squires, John R., Joseph D. Holbrook, Lucretia E. Olson, Jacob S. Ivan, Randal W. Ghormley, and Rick L. Lawrence, 2020. A Specialized Forest Carnivore Navigates Landscape-Level Disturbance: Canada Lynx In Spruce-Beetle Impacted Forests. Forest Ecology and Management 475 (2020) 118400. <https://doi.org/10.1016/j.foreco.2020.118400>

⁶ “Lynx habitat in an unsuitable condition consists of lynx habitat in the stand initiation structural stage where the trees are generally less than ten to 30 years old and have not grown tall enough to protrude above the snow during winter...”. Forest Plan at 4-14.

Piles of down dead logs provide denning habitat for lynx. Though denning at the ski area is not likely, piles should not automatically be removed, as they provide habitat for various species as is discussed above.

Protect potential critical habitat. In December 2024, the U.S. Fish and Wildlife Service released a proposed revised critical habitat designation 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 proposed critical habitat for the Southwest Colorado Canada Lynx population. The proposed Critical Habitat designation overlaps with the entirety of Telluride Ski Resort.⁷

This concerns us, 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.”⁸ 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.”⁹ 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).¹⁰

Due to the Canada Lynx’s threatened status under the Endangered Species Act, the USFS must adequately consider the effects of the proposed resort improvement projects on the species and habitat¹¹. This includes the effects of steep slope logging and cut to length technology, increased human activity through noise and presence, and new habitat fragmentation.

Our concerns are further outlined via the specific Southern Rockies Lynx Amendment (SRLA) management guidelines for human use projects. Specifically, we believe this resort improvement project does not fit within the following guidelines:

Objective HU 03: Concentrate activities in existing developed areas, rather than developing new areas in lynx habitat.¹²

⁷ Rocky Mountain Wild. “Canada Lynx Proposed Critical Habitat 2024.”

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

⁸ 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.

⁹ Canada Lynx Final Recovery Plan pp. 26

¹⁰ Canada Lynx Final Recovery Plan pp. 31

¹¹ 16 U.S.C. § 1531 et seq.

¹² SRLA ROD 2008, attachment 1-6

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.¹³

The proposed glading is too extensive, particularly at the top of Lift 10, near Lift 14, and around the upper reaches of Lift 9. While extensive logging may improve recreational skiing, it would reduce the effectiveness of lynx habitat that exists on Telluride Ski Resort. Furthermore, the Squires et al 2020 study observes that lynx preferentially use forests with wide-diameter trees impacted by beetle kill, as well as areas with downed spruce trees that improve habitat for snowshoe hare. Therefore, keeping these treed areas intact, even if they are impacted by beetle kill, would enhance and benefit lynx in a zone where high levels of habitat disturbance have already occurred.

While human-wildlife conflicts are inherent in increasing recreation in the region, we urge the agency to recognize the importance of the critical lynx habitat that is intermixed with terrain at Telluride Ski Resort. 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 Lynx Recovery Plan, “Anthropogenic changes that permanently decrease lynx habitat will be additive to permanent losses of lynx habitat due to climate change.”¹⁴

C. Potential Impacts from Green Tech Mountain Bike Trail

Although the proposed Green Tech Mountain Bike Trail connects to existing bike terrain and we are in support of recreation that is practiced in appropriate areas, we have concerns regarding the development of a new bike trail in proposed critical Canada Lynx habitat. Due to the Canada Lynx’s threatened status, the effects of the proposed trail on lynx and their habitat should be adequately considered.¹⁵ This includes the effects of new trail construction, increased human activity through noise and presence, habitat fragmentation, and cumulative impacts of the new trail in conjunction with existing activities and planned developments on the mountain.

As detailed in the SRLA management guidelines for human use projects, we are concerned whether the trail fits within Objective HU G3, which specifies that recreation development and recreational operational uses should be planned to provide for lynx movement and to maintain the effectiveness of lynx habitat.¹⁶ Given the lack of mapped detail about how the trail interfaces with the rest of TSR’s biking terrain and the lack of information about potential economic impacts from additional riders due to the new terrain, we request that additional information be provided about these aspects as well as evidence that the proposed trail will not impede free lynx movement.

We also presume that attracting additional riders will require additional TSR workers who will need housing, and the economic impacts and benefits of the trail are unclear. We request that TSR conduct an assessment of the economic impacts of expanded ridership including how additional workers would be accommodated.

Construction of the trail will necessitate vegetation removal and soil compaction, while the use of machinery and construction materials to simulate varied terrain have the potential to disrupt wildlife in the short and long term. In addition, because the trail would introduce riders to varied terrain that does not currently exist to facilitate skill progression, it is assumed that this terrain would attract new riders, thus increasing human activity in the “off season” and creating opportunities for more frequent and consistent

¹³ SRLA ROD 2008, attachment 1-7

¹⁴ Canada Lynx Final Recovery Plan pp. 26

¹⁵ 16 U.S.C. § 1531 et seq.

¹⁶ SRLA ROD 2008, attachment 1-7

human/lynx interactions. Furthermore, as with any introduced terrain, additional access increases the potential for riders to go “off trail” in lynx habitat, potentially escalating the impacts of additional bikers.

The Green Tech Mountain Bike Trail could lead to further habitat degradation for lynx, reducing or interfering with an existing lynx corridor.¹⁷ It is known that lynx select travel routes that follow gentle gradients and forested riparian zones,^{18, 19} with lynx movements concentrated near stream corridors.^{20,21} Linear developments (trails, roads) parallel to drainages have been found to significantly reduce lynx occupancy and use unless vegetative screening is intact.²²

Snowshoe hare, the primary food source for Canadian lynx tend to avoid open trails, and lynx will also lose stalking cover due to an additional cleared trail. Cleared vegetation may also affect food sources and habitat for snowshoe hare, indirectly stressing the lynx population. We request that an assessment be conducted that takes into account potential impacts of further habitat fragmentation and disturbance near Prospect Creek as a result of the Green Tech Mountain Bike Trail.

Viewed as a single bike trail connecting to existing mountain biking infrastructure, the trail brings up the concerns previously discussed. However, when viewed in the context of all proposed developments on the mountain, the impacts of the proposed Green Tech Mountain Bike Trail may be significantly greater. New infrastructure and infrastructure updates that are subject to appropriate environmental review will most succinctly and thoroughly assess compatibility with wildlife and other resource values. To ensure that environmental information is available to public officials and citizens before decisions are made and before actions are taken, the Forest Service must disclose all impacts of this proposed project. This includes direct, indirect, and cumulative impacts (or effects) the proposed project may have, as well as connected, cumulative, and similar actions.

In addition to examining the direct impacts of the proposal, which may be localized to the area immediately surrounding the new trail construction, the agency has an obligation to analyze impacts that extend beyond the immediate, physically evident, on-the-ground effects of the new trails. These indirect and cumulative impacts may include effects related to changes in the pattern of land use, changed recreation patterns across the regional landscape, and related effects to ecosystems, wildlife, and other natural systems.

Teleski’s Green Tech Mountain Bike Trail presents an opportunity for expanded non-motorized recreation that is close to existing recreation corridors. And while channeling recreational growth into managed areas in close proximity existing infrastructure is desirable, doing so necessitates closely examining the additional impacts to wildlife, implications in our changing climate, and forest composition changes. Thus it is essential that the agency carefully examine the direct, indirect, and cumulative impacts from this proposal.

¹⁷<https://www.arcgis.com/apps/instant/interactivelegend/index.html?appid=b3e1f4c17e98481c85f9683b02e91250>

¹⁸ U.S. Forest Service Rocky Mountain Research Station. Canada lynx biology and management summaries (various reports)

¹⁹ U.S. Fish & Wildlife Service (USFWS). (2014). Revised designation of critical habitat for the Canada lynx. Federal Register, 79 FR 54782

²⁰ Squires, J. R., et al. (2010). Seasonal resource selection of Canada lynx in managed forests of the northern Rockies. *Journal of Wildlife Management*, 74(8), 1648–1660.

²¹ Shenk, T. M. (2009). Post-fire Canada lynx use in Colorado. Colorado Division of Wildlife.

²² Apps, C. D. (2000). Space-use, diet, demographics, and topographic associations of lynx in the southern Canadian Rocky Mountains: A study. British Columbia Ministry of Environment.

D. Lift Replacement

SMA recognizes the utility and safety concerns surrounding the currently operating Lift 7 and Lift 8. We support upgrading the lift infrastructure to meet modern standards and better serve resort patrons in safe and efficient ways. The scoping letter and accompanying map displays a small section of timber that would be removed to relocate the Lift 8 terminal. We ask that the methodology for this timber removal is analyzed in tandem with other proposed forest health treatments. An additional factor to consider is the impact of increased lift capacity on the number of skiers transported per unit time. We ask TSR to consider the impact of this increased capacity for the resort through conducting an economic analysis of the project's proposed actions, including infrastructure upgrades and building a new bike trail.

VI. Conclusion

The projects proposed in the scoping letter present a wide array of impacts to forest health and wildlife that must be adequately considered. The EA for the project needs to describe in detail the existing composition, structure, and condition of stands in the project area, and how proposed treatments, as well as the Green Bike Trail, would affect habitat for lynx and other wildlife and the potential use of the habitat.

Furthermore, Sheep Mountain Alliance and Rocky Mountain Wild look forward to further discussing the terms of the settlement agreement in relation to the expansion of High Camp to identify paths forward that satisfy both parties.

Sincerely,

Ruthie Boyd, Program Director
Emily Laidlaw, Director of Strategic Initiatives
Sheep Mountain Alliance

Matthew Sandler, Legal Director
Rocky Mountain Wild

Mark Pearson, Executive Director
San Juan Citizens Alliance

Rocky Smith, Forest Management Analyst
1030 North Pearl St. #9
Denver, CO 80203
2rockwsmith@gmail.com