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Comments: VIA ONLINE PORTAL

Scott Spielman, Recreation Manager

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May 11, 2026

Dear Mr. Spielman,

On behalf of the Town of Telluride, thank you for the opportunity to submit comments on the Draft Environmental Assessment (EA) for the Telluride Ski Resort Improvements Project. We appreciate the Forest Service's work in developing the EA and acknowledge the shared objective to improve safety, reliability, and the overall guest experience at Telluride Ski Resort (TSR).

This letter builds upon the Town's previously submitted Scoping Phase Preliminary Comments and provides a structured comparison between the Town's priorities and the analysis presented in the Draft EA. We also provide additional context on industry standards for lift capacity and speed, which we believe is essential to evaluating the adequacy of the proposed lift replacements.

1. Lift 7 Replacement - Alignment With Industry Standards and Community Needs

The Town reiterates strong support for replacing Lift 7. As stated in our preliminary scoping letter, Lift 7 serves the largest year round population base in the entire Special Use Permit (SUP) area, including Town residents, students, and visitors within a 5 minute walk of the portal. Furthermore, and consistent with adopted plans, the Town is in the planning phase of adding 250-300 affordable housing units in multiple projects that will be within a 5-minute walking distance of the lift.

The Draft EA affirms that Lift 7 is a 1975 Riblet/SLI fixed grip double, nearing the end of its operational life and causing congestion and reliability issues. The EA allows a wide range of replacement configurations (1,200-2,400 pph), including both fixed grip and detachable options.

However, based on industry norms at major North American resorts, a detachable quad with ~2,400 pph is the contemporary standard for a primary Town side portal. Fixed grip configurations fall significantly below peer resort standards for base area access, uphill capacity, and ride time efficiency.

We therefore continue to recommend that the Forest Service require a 2,400 pph detachable quad for Lift 7, in accordance with current industry norms and standards.

The Draft EA also states that alternative alignments-such as extending Lift 7 to the top of Lookout-were considered but eliminated. The Town requests additional transparency regarding these screenings, as prior

communications from TSR referenced a potential extension.

2.Lift 8 Replacement - Capacity, Reliability, and Base Area Congestion

The Town's scoping comments emphasized the need for Lift 8 to be replaced with at least a fixed grip or detachable quad, given its role in maintaining reliable circulation between the Town of Telluride and Lift 9.

The Draft EA proposes only fixed grip options (950-1,200 pph). This is below the performance standard for major resort connector lifts, where detachable technology is commonly used to accommodate high morning and midday demand.

The Town also remains concerned about base area congestion, noting that the terminus of Lift 8 shares space with the gondola terminal, pedestrian flows, and growing summer activity. We request further analysis of terminal design options-including a top drive configuration-and demonstration of compliance with local and other applicable regulations for disturbances near wetland areas.

3.Infrastructure Equity Between Town and Mountain Village

A theme in the Town's scoping comments is the historic disparity in lift modernization between Mountain Village portals (multiple high speed quads) and Town portals (two 1970s era doubles), and the resulting difference in reliability and frequency of service to residents and visitors.

The Draft EA does not address how lift replacements can support balanced access across communities. From a planning and equity perspective, modernization of Town side lifts is necessary to ensure comparable service levels and community benefits. This should be discussed and evaluated in the Final EA.

4.Environmental Considerations - Wetlands, Noise, and Helicopter Use

The Town appreciates the Draft EA's analysis of environmental impacts but requests additional clarity on:

*Wetland impacts near the bottom terminals of Lifts 7 and 8, compliance with local and other applicable wetland regulations, and avoidance of long term hydrological effects of proposed activities. The EA identifies potential permanent impacts at Lift 7's base and smaller temporary effects elsewhere.

*Mitigation of noise and vibration impacts, especially during construction, which may affect nearby residences in the Town.

*Helicopter use, even if minimal, which has historically raised community concern.

5.Early Season Access and Snowmaking

The Town strongly supports enhanced early season snowmaking, particularly on the north side of the ski mountain, adjacent to the community. The north side of the mountain is a critical ski link for residents, visitor accommodations, and commercial establishments of Telluride.

The Draft EA addresses snowmaking on the proposed Jaws Skiway to allow TSR to open Lift 9 earlier in the season, but it does not consider expanding enhanced snow coverage more broadly. We request that the Final EA include additional exploration and evaluation of early season improvements directly benefiting Town side users.

6.Operational Considerations - Lift 8 Afternoon Closure

The Town continues to recommend revisiting the policy of closing Lift 8 at 1:30 p.m., which undermines access to

the ski area from Telluride. While this may strictly fall outside the scope of NEPA's evaluation of environmental impacts, its operational importance should be evaluated in the Final EA and acknowledged in implementation planning.

7. Additional Comment - On-mountain Food Service (Giuseppe's Closure)

The Draft EA notes the Telluride Ski Area is currently deficient in on-mountain food service. This deficiency, in large part, is a result of the Ski Area's closure three years ago of the Giuseppe's Restaurant at the top of Chairs 6 and 9. Giuseppe's is the only restaurant on the mountain within the SUP area that offers direct ski access to Telluride (without getting on a lift) and lift access from the Town of Telluride (via Chairs 7/8 to 9). Despite this noted deficiency, the Draft EA appears to support expansion of the High Camp facility into a full-service restaurant over the reactivation of the existing Giuseppe's Restaurant site. We request the Final EA evaluate the impacts of these alternatives.

Conclusion

The Town of Telluride supports the modernization of the resort's critical lift infrastructure and respectfully requests that the Forest Service:

- *Evaluate and prioritize detachable quad configurations for Lifts 7 and 8 to align with resident and visitor expectations, and industry standards for a primary Town side portal.
- *Analyze the equity, capacity, congestion, and early season access concerns disproportionately affecting Telluride residents and visitors.
- *Provide additional analysis of wetland impacts, terminal design, and construction effects near Town boundaries.

Thank you for your consideration of these comments as you prepare the Final EA. We look forward to continued coordination as the process advances.

Sincerely,

Zoe Dohnal
Town Manager
Town of Telluride