Data Submitted (UTC 11): 3/10/2025 5:38:53 PM First name: Christina Last name: Casas Organization: Idarado Legacy Home Owners Association Title: President Comments: Idarado Legacy Homeowners Association, a Colorado nonprofit corporation

March 10, 2025

VIA EMAIL kimberless.phillips@usda.gov United Stated Forest Service

RE:Comments to Telluride Mountain Club Trail Proposal

Dear Sir/Madam,

The Idarado Legacy Homeowners Association ("Association") respectfully submits its comments concerning certain elements of the Telluride Mountain Club's proposal for new trail connections within the Telluride region of San Miguel County.

The Idarado Legacy Homeowners Association represents the interest of the 37 owners of lots in the Idarado Legacy Subdivision, who are each members of the Association. The Idarado Legacy Subdivision is located east of the Town of Telluride and north of the San Miguel River as indicated on the attached vicinity map.

We have specific comments about the proposed "south side perimeter trail" (SSPT) that is located east of Telluride and south of the San Miguel River, at a location that is proximate to the Idarado Legacy Subdivision. According to the Telluride Mountain Club Trails Proposal, the SSPT would be an unpaved primitive trail, serving mid-level hikers, portions of which would be located along steeper sections of topography and cross Bear Creek, which would be a costly trail to design, construct and operate.

The Association's comments include the following:

1.As part of the design of the development plan for the Idarado Legacy Subdivision, a trail extending along the perimeter of the subdivision was proposed and was ultimately built and included in the San Miguel County regional trail system. The Idarado Legacy Trail as it is known, is a popular trail, finished with a surface treatment of fine crushed gravel, which is used by locals and visitors to walk along the river connecting the Town of Telluride to the eastern end of the box canyon The Idarado Legacy Trail serves the recreational needs of the community. The Association does not see the value or need for the new trail on the south side of the river. According to the Telluride Mountain Club Trails Proposal, the SSPT would be an unpaved primitive trail, serving mid-level hikers, portions of which would be located along steeper sections of topography and cross Bear Creek, which would be a costly trail to design, construct and operate. It would serve a much different group of users and be in conflict with those using and enjoying the Idarado Legacy Trail.

a.We are concerned about the resulting impacts that this new trail would have to the current status and use patterns of the Idarado Legacy Trail and any negative impacts would be unwelcome to the Association and the general community using the Idarado Legacy Trail. The use of the Idarado Legacy Trail as a connector to the south side perimeter trail could detrimentally convert the Idarado Legacy Trail away from a casual easy walking path enjoyed by families, locals and guests into a mountain biking loop. The increased biking traffic would become problematic for the intended users of the Idarado Legacy Trail.

b. The Mountain Club also states that this trail connection would create a very popular destination trail network, similar to the trails above the City of Ouray, which both local and tourists would be expected to use. While this has its merits, its falls short on details such as where parking could and would occur. The Association does not agree that Bridal Veil Trail Parking congestion would be diminished with the SSPT. Instead, it would likely increase congestion as bikers are dropped off at the Bridal Veil Trail Parking and they ride west (downhill) along the SSPT. Given the status and location of the Idarado Legacy Subdivision along this corridor, we are concerned that our community will be forced to absorb and contend with various of these impacts, such as parking on our paved internal subdivision streets.

2. The Association recalls that during the review of the Idarado Legacy Subdivision, there were discussions about the possible placement of a trail generally of this design and location and the Idarado Mining Company rejected it given its proximity to the tailings piles that will be located in close proximity to the proposed SSPT and readily accessible to thes Idarado Mining Company environmental impoundment areas. Idarado Mining Company has been managing these with great care and caution for decades. Nothing has changed in the 20 years since the Idarado Legacy Subdivision was being developed and the notion of a trail at the location contemplated by the Telluride Mountain Club was rejected for the reasons noted above.

3. The Association believes that the design and location of the south side perimeter trail would have a direct and negative effect on wildlife along the river corridor.

4. The proximity of the south side perimeter trail would directly and negatively affect the lot owners in the Idarado Legacy Subdivisions and negatively impact their use and enjoyment of their lots The County property was never intended for active open space purposes.

5. The trail would come at a significant expense but create little incremental recreational utility - these monies (even if raised philanthropically) could be spent developing purely added trail opportunities - e.g., the Sunshine area as proposed.

For these reasons, the Association wishes to state its position of opposition to the south side perimeter trail and we reserve our right to supplement our comments as more information becomes available.

Idarado Legacy Homeowners Association

By: Christina Casas President Idarado Legacy Homeowners Association