

Scott Spielman
United States Forest Service
Norwood Ranger District
PO Box 388 Norwood, CO 81423

RE: Telluride Ski Resort Improvements Draft Environmental Assessment

May 11, 2026

Dear Mr. Spielman,

Thank you for the opportunity to comment on the proposed Telluride Ski Area Improvements Draft Environmental Assessment. The following are the comments of Sheep Mountain Alliance, Rocky Smith, Rocky Mountain Wild, and San Juan Citizens Alliance on the proposed Telluride Ski Area Improvements, as described in the draft environmental assessment (DEA) and related documents. We incorporate our scoping comments of May 30, 2025 by reference.

I. Cumulative Impacts

A. The DEA must analyze the combined effects of all of the proposed projects.

The DEA analyzes several projects at once, including lift replacements, terrain improvements, forest health/glading projects, on-mountain facility upgrades, a summer mountain bike connector trail, and permanent approval of the existing Heritage Trail ski trail. DEA at 1, 8-14. These should not be treated as isolated projects. Their combined effects must be analyzed and disclosed.

Our scoping comments raised this concern. Increased lift capacity, new or improved ski terrain, year-round bike use, extensive vegetation removal, and increased human presence may change how people use the ski area and adjacent habitat. The agency must look at these indirect and cumulative impacts, not just the immediate footprint of each project.

The DEA admits that increased human presence due to population growth and expanding recreational use is occurring throughout the GMUG and may reduce the size and effectiveness of wildlife security areas and fragment key habitats. See DEA at 49. That is exactly the concern here. The proposed action would add more access, more use, and more openings in forested habitat. The DEA should analyze these effects together.

B. An EIS should be prepared, or at least a revised EA.

The project may have significant impacts. It involves Canada lynx habitat, proposed critical habitat, vegetation removal in high-elevation forest, wetlands, steep-slope tethered logging, increased recreation use, and the High Camp settlement issue. These effects are not minor or fully resolved.

NEPA requires the agency to take a hard look before approving the project. An EA is supposed to determine whether the action may significantly affect the environment and therefore require an EIS. *Middle Rio Grande Conservancy Dist. v. Norton*, 294 F.3d 1220, 1225-26 (10th Cir. 2002). If substantial questions remain about significant effects, the agency should prepare an EIS. At minimum, the current DEA should be revised and recirculated.

II. Settlement Agreement

A. Violation of Settlement agreement - High Camp Restaurant Expansion

The Forest Service must remove the proposed High Camp restaurant expansion from the proposed action, or at minimum defer any decision on that component unless and until the parties to the Settlement Agreement confer and execute a valid modification. As currently proposed, the High Camp restaurant expansion directly conflicts with a binding settlement agreement that resolved prior litigation over the Telluride Ski Area Expansion.

The Settlement Agreement is not background context—it is a binding contract between the Plaintiffs, the U.S. Forest Service, and Telski that expressly binds all parties and their successors-in-interest. Colorado Wild and Sheep Mountain Alliance were parties to that agreement, and Rocky Mountain Wild is Colorado Wild’s successor-in-interest. The Agreement contains no expiration clause, no temporal limitation, and no provision allowing unilateral modification based on changed conditions or agency preference.

The operative restriction is clear and mandatory. The Agreement provides that the PHQ/warming hut/interpretive center shall be limited to no more than 1,000 square feet in surface area, and that the permitted uses shall include only ski patrol headquarters, warming hut and other ski safety-related uses. This language is prospective and binding. The use of “shall” reflects an ongoing obligation, not a one-time condition tied only to the 1999 Record of Decision.

The Forest Service’s own materials confirm the conflict. The agency proposes to convert the High Camp warming hut into a full-service restaurant, allow on-site food preparation, expand the structure beyond 1,000 square feet, and increase seating and service capacity. These features are incompatible with both the Agreement’s size limitation and its restriction to ski safety and warming uses.

This is a clear violation. A full-service restaurant falls outside ski patrol headquarters, warming hut, and other ski safety-related uses. The proposed expansion is therefore a direct breach of the Agreement’s central land-use restriction.

The Forest Service is itself a party to the Settlement Agreement. It cannot approve a project that authorizes conduct prohibited by that agreement without first modifying it through proper conferral with the parties. Doing so would render the agency’s decision contrary to law and arbitrary under the Administrative Procedure Act.

The Draft EA’s apparent suggestion that the Settlement Agreement applied only to the 1999 decision and does not constrain future approvals is incorrect. Nothing in the Agreement

limits its restrictions to a single decision or a single moment in time. The Agreement imposes continuing obligations that bind the parties and their successors.

Plaintiffs did not settle federal litigation in exchange for a temporary delay that could be circumvented by waiting and re-proposing the same prohibited development. The consideration exchanged in the Agreement included substantive, forward-looking limits on development. Interpreting the Agreement otherwise would deprive Plaintiffs of the benefit of their bargain.

Changed conditions, passage of time, or guest preferences do not modify a binding agreement. The Draft EA's new rationale conflicts with the Agreement's plain language and basic principles of contract interpretation.

Because the proposed High Camp restaurant expansion violates a binding settlement agreement, the Forest Service must remove the restaurant expansion from the proposed action, analyze an alternative that excludes restaurant development at High Camp, disclose the Settlement Agreement as a binding legal constraint, and refrain from approving any restaurant conversion unless and until the Agreement is formally modified by all parties.

Sheep Mountain Alliance and Rocky Mountain Wild remain willing to confer regarding a potential modification to the Agreement. However, absent such modification, approval of the High Camp restaurant expansion would authorize a breach of the Settlement Agreement and render the agency's decision unlawful.

III. Analysis of Impacts from a Full-Service Restaurant at High Camp

The impacts of a full-service restaurant at High Camp should be studied and quantified. The DEA should not treat this as a minor change to an existing warming hut.

A. Water

The DEA should quantify the restaurant's projected water demand, identify the source of that water, and disclose whether new or modified water infrastructure would be required. It should also explain whether water use at High Camp would affect other water needs, especially during dry years or high-use periods.

B. Septic and sanitation

The DEA should quantify wastewater generation and explain how sewage, grease, food waste, and sanitation needs would be handled. A full-service restaurant would create more wastewater and waste than a warming hut. The DEA should disclose whether septic, holding tanks, lift stations, grease traps, or other infrastructure would be needed and how these systems would be maintained.

C. Fuel and fire risk

The DEA should analyze whether the restaurant would require new or increased propane, natural gas, electrical, generator, heating, refrigeration, or cooking infrastructure. It should

disclose the location and safety measures for fuel storage and delivery. It should also analyze fire risk and emergency response, given the high-elevation location and winter access limitations.

IV. Conservation Alternative

A. The DEA does not consider sufficient alternatives

The DEA considers only the proposed action and no action. DEA at 15-16. It does not consider alternatives that would meet most of the purpose and need but reduce impacts. For example, it does not consider an alternative that would allow the lift replacements but forgo the proposed glading. It also does not consider an alternative that would greatly reduce impacts to lynx habitat.

Notably, the DEA dismisses the conservation alternative that was requested during scoping. DEA at 16. It does so in part because the proposed action is said to minimize impacts to lynx. DEA at 16. That is not the case, as discussed below.

The Purpose and Need is written so that only the proposed action would fit. The stated need includes adding ski terrain variety, improving skier egress, upgrading dining facilities, adding a bike trail, approving the Heritage Trail, and promoting forest health through glading. DEA at 2-3. That is essentially a list of the applicant's proposed projects. NEPA does not allow the agency to define the purpose and need so narrowly that only one alternative can meet it. See *Citizens Against Burlington, Inc. v. Busey*, 938 F.2d 190, 195-96 (D.C. Cir. 1991); *Colorado Envtl. Coal. v. Dombeck*, 185 F.3d 1162, 1174-75 (10th Cir. 1999).

Alternatives also do not have to meet every part of the purpose and need to be reasonable. A reasonable alternative may meet most of the project purpose while reducing environmental harm. The agency should therefore analyze a conservation alternative that includes less glading and less tethered logging, and that avoids the largest blocks of lynx habitat.

B. Reasonable alternatives that should be analyzed

The following are reasonable alternatives that should have been considered within the DEA:

- Lift replacement without glading. This alternative would allow replacement or modernization of lift infrastructure while eliminating or deferring new glades, new skiways, and other vegetation conversion in lynx habitat.
- Reduced glading. This alternative would remove the largest glading units from the project, including the areas in primary suitable lynx habitat and the larger inter-trail islands.
- Lynx conservation alternative. This alternative would avoid proposed critical habitat and primary suitable habitat except for necessary hazard-tree removal next to existing ski runs or lift infrastructure.
- Settlement-compliance alternative. This alternative would omit or defer the High Camp restaurant expansion unless and until the parties to the 2001 Settlement Agreement confer and modify the Agreement.

- Wetland avoidance. This alternative would prohibit tethered logging, slash mats, glading, machinery travel, and repeated snow compaction in wetlands and appropriate buffers.
- Phased alternative. This alternative would authorize lower-impact improvements first, then require monitoring and additional analysis before additional vegetation conversion is approved.

These alternatives are not speculative. They respond to the comments already submitted during scoping and would meet much of the project purpose and need while reducing impacts to lynx habitat, wetlands, soils, forest structure, and habitat connectivity.

V. Tethered logging

A. The DEA relies on prior SBEADMR analysis of the project area for treatment, but tethered logging methodology has not been sufficiently analyzed

The DEA fails to properly analyze the use of tethered logging in the project area. The DEA relies on several justifications to support the use of tethered logging methodology in the proposed treatment area, including the 2016 SBEADMR EIS, 2022 SBEADMR SIR, and the 2024 Forest Plan. See DEA at 10. While these previous decisions include analysis of all but 65.1 acres of the project area for treatment under SBEADMR, the entirety of the project area has not been sufficiently analyzed for the use of tethered logging methodology.

Previously, projects at TSR occurred under the 2016 SBEADMR ROD and the 2015 Telluride Ski Resort Vegetation Management Plan. See DEA at 12. Per the 2016 SBEADMR analysis, these treatments were compliant with the 2016 decision, and utilized methodologies including ground-based skid crews and helicopters at higher slope angles.

In 2022, the SBEADMR Supplemental Information Report on Cut-to-Length and Tethered Logging technologies analyzed the “language of the design criteria in the SBEADMR checklist and the FEIS analysis to determine whether or not the language is consistent with use of newer technology,” including cut-to-length systems which may be used with a tether on steep slopes. The report found the language to be “consistent with Forest Plan Standards and the analysis of impacts in the SBEADMR EIS given the location of some of the steeper slopes where this equipment is likely to be used.” See SIR at page 4. However, the SIR did not analyze the use of tethered logging technology in reference to the 2024 Forest Plan revision.

Consequently, neither the 2022 SIR nor the DEA addresses tethered logging in the context of the 2024 Forest Plan Revision.

2022 yielded an additional update to the SBEADMR implementation checklist. Specifically, three sentences were added to the SBEADMR implementation checklist to include tethered logging as a methodology:

- WQSB-7B(A): If cut-to-length logging equipment that travels over a slash mat rather than bare soil is used, 50-60 foot spacing of trails is acceptable

- (WFRP-11): If cut-to-length logging equipment that travels over a slash mat rather than bare soil is used, 50-60 foot spacing of trails is acceptable.
- WQSP-5B(D): Use of cut-to-length harvester/forwarder systems that travel on a slash mat, rather than bare soil, is acceptable on slopes up to 60%.

Despite there being limited mention of cut-to-length technology in the updated 2022 SBEADMR checklist, the DEA references the 2017 implementation checklist in Appendix 2 as the checklist that will be utilized for the project. The 2017 implementation checklist makes no mention of the tethered cut-to-length technology. See DEA at 13.

Furthermore, the SBEADMR AMG agreed that this new technology would be implemented only in “pilot projects,” which would include a provision for pre and post-project monitoring to “measure[e] the ability to meet project objectives while minimizing soil disturbance (erosion, displacement, and compaction).”

In 2024, CTL tethered logging was implemented on Monarch Pass. The results of this project were variable. The impacts of erosion caused by the project were quantified in a presentation authored by Maddie Roberts et al. The presentation lists increased soil disturbance and safety as challenges for steep slope mechanical operations. Erosion was monitored through the implementation of sediment fences and rill surveys. In some instances, treatments for erosion were successful. However, erosion, scarring, lack of ground cover and soil damage is clearly visible in the path of areas disturbed by the tethered logging operations. See Exhibit A, which depicts photos from the Monarch Pass project area along the San Isabel National Forest, including images of soil erosion in the impacted areas.

It is clear that in addition to a lack of formal analysis, there have been an insufficient number of “pilot projects” on the GMUG to address these questions and concerns, and thus, the impacts of this technology are relatively unknown within the project area. The outcome of the Monarch Pass project serves as a warning of the potential negative impact the treatment could have on soil erosion and disturbance. If tethered logging technology is utilized in this project, what measures will be taken to ensure soil erosion is minimized and adequately monitored? How will these measures provide a different outcome than the project at Monarch Pass?

While analysis in the Biological Assessment of the DEA analyzes the impacts of tethered logging under the SRLA objectives, the methodology itself has never been formally or practically analyzed for the project area in the DEA. The 2022 SIR does not provide sufficient information and clarity regarding the potential impacts of tethered logging nor where tethered logging may occur. Furthermore, the DEA fails to mention if, or how, tethered logging would comply with 2024 Forest Plan criteria.

In 2023, a collection of conservation groups, including Sheep Mountain Alliance, wrote a letter to Chad Stewart questioning the viability of tethered logging methodology under the 2016 SBEADMR analysis. Questions raised in the letter included that steep slope logging was never considered or approved when SBEADMR was finalized in 2016, and therefore, areas with steep slopes were excluded from the EIS because of the difficulties with steep slope logging. See

SBEADMR Appendix H1 Response to Comment Report at 142. Although Forest Supervisor Chad Steward cancelled the project due to lack of SBEADMR AMG agreement, these topics remain unaddressed and are of relevant concern to Sheep Mountain Alliance and other endorsers of these comments. See SBEADMR Letter from Conservation Groups and Signed Response to April 20, 2023 Conservation Groups Letter, attached as Exhibit B.

Together, neither the 2016 nor 2022 updates to SBEADMR adequately analyze tethered logging methodology. Minimal successful implementation of tethered logging pilot projects on the GMUG necessitates continual monitoring. Furthermore, the cancellation of the 2022 Telluride Ski Resort pilot project indicates the lack of analysis and clarity surrounding tethered logging methodology.

The lack of analysis for tethered logging, and the absence of historically successful projects or implementation frameworks, is greatly concerning. As such, the Forest Service must conduct a supplemental EIS to the original SBEADMR decision that adequately addresses the impacts of tethered logging in the GMUG, including in the proposed project area. This EA justifies the use of tethered logging through haphazard descriptions of the technology and its use in other forests and resorts. See DEA at 31. In 2023 conservation groups made it clear on the use of tethered logging: a supplemental environmental analysis is necessary if the technology is used within SBEADMR. Years later, this issue remains the same.

B. The DEA does not adequately analyze the tethered logging methodology in the project area

The DEA does not provide enough site-specific information about tethered logging. It says that tethered logging routes can be 50 to 60 feet apart. DEA at 69. The BA states that such routes are typically 60 feet apart. BA at 5; see also DEA at 13. These routes would not be small disturbances. They would create repeated linear openings across steep slopes and forested islands.

It is also unclear how the prescriptions would be implemented. BA p. 38 states that stands would be cut according to the SBEADMR prescription for stands with less than 40 percent overstory mortality. Under this prescription, up to 40 percent of the existing stocking in each treated stand could be removed - 25 percent for cutting and 15 percent incidental damage via skid trails. BA at 38; SBEADMR FEIS Appendix A at 3. But glading is not the same as removing pockets of dead and dying trees. To create glades, cuts would be made to create paths for skiers. Such cuts would not necessarily be centered on dead and dying trees.

The DEA also does not clearly explain how logs would be removed if landings are eliminated or reduced. See DEA at 58. The agency should disclose where equipment would travel, where logs would be processed, how slash not used for slash mats for tethered logging equipment would be handled, how soils would be protected, and how treated corridors would be closed to skier use if they are not intended to become new ski routes.

C. Tethered logging and glading would reduce wildlife habitat effectiveness

Cuts for fuel reduction would also get skied. These areas would likely become attractive to skiers because they would create openings in the forest. The whole point of glading is to make the terrain skiable. Thus the agency should not assume that treated areas will simply regenerate and remain as effective wildlife habitat.

The BA assumes that areas cut via tethered logging could soon be considered areas of advanced regeneration as trees and shrubs begin to establish after canopy opening. BA at 24-25. However, to maintain the glades, any new trees would have to be cut or otherwise knocked over to keep the terrain safe to ski. Otherwise, trees would fill in the glades when they got tall enough to protrude above the snowpack. Young trees could also be crushed by snow compaction from skiers. Snow mold could also kill trees that remain submerged under compacted snow for long periods.

It is not even clear that new trees would regenerate in treated areas. Tethered logging equipment would lay down slash mats for operations. Equipment running over the slash mats would compact soil, making it difficult for trees to regenerate and grow. The slash would decompose slowly at the high elevation of the ski area. Areas between logging trails may also be too open for regeneration of shade-tolerant trees like Engelmann spruce and subalpine fir. Alexander, 1987, explains that exposed seedbeds can dry out and heat rapidly, causing germination failure and seedling mortality. Alexander at 25.

Even if trees did regenerate, it would likely be decades before they were tall enough to provide dense horizontal cover for lynx. (See section VI below.) Trees must protrude well above the winter snowpack before they provide effective cover for snowshoe hare and lynx.

Treatment that removes larger trees to create glades or reduce fuels would also likely break, crush, or uproot smaller trees that help form the dense horizontal cover needed by snowshoe hare, the primary prey of lynx. The BA states that the understory will remain intact except where tethered logging routes are established. BA at 43. But with routes every 50 to 60 feet, this exception could be significant.

The Interagency Lynx Biology Team explains that stem density and snowshoe hare density are directly and positively correlated, and that vegetation management that promotes high stem density and dense horizontal cover can increase snowshoe hare densities. IBLT, 2013, at 72. It also states that removing or reducing understory and ladder fuels reduces dense horizontal cover important to snowshoe hares and diminishes habitat value for hares and lynx. Id. at 74.

D. Windthrow must be analyzed before cutting.

Before any trees are cut, the possibility of windthrow must be evaluated. Trees growing in a stand develop wind firmness as a unit. Removal of trees can adversely affect the wind firmness of the entire stand. Any cuts should be designed to minimize windthrow, and trees in high windthrow areas should not be cut.

Freshly downed trees provide ideal breeding places for spruce bark beetles. Thus actions that make residual stands more susceptible to blowdown should be avoided.

E. Wetlands should be protected by avoiding them.

The Wetland Technical Memo states that impacts from glading would only be temporary. That is not necessarily the case. Skiers and snowboarders would compact snow over wetlands in proposed glades. This could delay snowmelt each season and delay greening and flowering of wetland vegetation, possibly diminishing wetland functions.

Wetlands should be completely avoided in implementing tethered logging for glades and other vegetation management. This should be feasible, given the small areas of wetland identified in the Wetland Technical Memo. See Wetlands Technical Memo, Table 2.

VI. Lynx

A. The proposed project would not conserve lynx habitat

Lynx habitat in the project area is “generally considered to be of high quality.” BA at 27. The lynx habitat includes proposed critical habitat, as the proposed critical habitat overlaps the project area. BA at 17.

The proposed action would adversely affect lynx habitat by cutting glades, new lift locations, skiways, and trails. The BA admits that “[t]he proposed activities do add to the fragmentation of connected mature forests but also will add a component of advanced regeneration in the ski area.” BA at 24-25. The latter part is likely untrue for the reasons discussed above.

Figure 5 in the BA, at p. 23, shows proposed glades mostly in lynx habitat, much of it in primary suitable habitat. Figure 7, at p. 29, shows most of the project area in “likely” lynx habitat, which is defined as habitat that most likely supports breeding populations of Canada lynx. BA at 21, 29. Figure 8, at p. 30, shows almost all of the proposed project area footprint in primary suitable habitat. The BA also states that habitat structure in the vicinity provides suitable denning and foraging for snowshoe hare, the primary prey for lynx. BA at 31.

Contrary to BA p. 37, the proposed treatment would not manage areas toward Potential Natural Vegetation. Rather than maintain or allow vegetation to develop toward its natural late state in the absence of disturbance, the proposed logging and glading would create permanent or long-term openings. This is not a natural forest structure.

Thus the current lynx habitat in areas to be treated would likely be lost or substantially degraded. Lynx habitat would be fragmented. Larger blocks of habitat should be kept intact to reduce fragmentation. Thus the larger units proposed for glading, such as the unit under Lift 10 and the unit between Lifts 4 and 5, should not be treated. See DEA Figure 1 at 71.

The BA admits that treatment would diminish habitat within the inter-trail islands:

Multiple glading areas will impact inter-trail islands reducing coarse woody debris that would act as habitat for snowshoe hare. BA at 35-36.

B. The project would increase human use and snow compaction in lynx habitat

The proposed treatments would increase human presence in lynx habitat by creating glades. The BA states that there will be some level of increased human presence in some gladed areas where activities might open the terrain enough to become inviting to skiers. BA at 45-46. The whole purpose of creating glades is to increase ski terrain, so the glades will be inviting to skiers by design.

Use of the glades would increase disturbance to lynx, which often bed down during the day so they can hunt at night. The BA observes that lynx may alter their behavior to avoid disturbance, including by becoming more nocturnal and resting or hiding more during the day when disturbances are high. BA at 40-41. Increased use would, at a minimum, decrease habitat effectiveness and could force lynx to avoid the area when the ski area is open.

The DEA admits that increased human presence is anticipated to exacerbate existing pressures throughout the LAU and greater vicinity. DEA at 49. Specifically in the project area, the BA states that thinning may result in increased winter recreation use, which could slow the rate of regenerating vegetation and make these areas take longer to recover. BA at 32-33; see also BA at 35. As discussed above, gladed areas may not recover at all if they are maintained for skiing.

Snow compaction would increase, especially with the new skiways, BA at 33, and also with skier use of the new glades. Increased snow compaction reduces the advantage that lynx and snowshoe hare have in traveling across uncompacted snow. It may also open the project area to coyotes and other predators or competitors, reducing the number of hare available to lynx.

C. The project appears inconsistent with the Southern Rockies Lynx Amendment.

The proposed glades would be implemented to increase use at the ski area. Therefore, they are a human use project and should be subject to SRLA Objective HU 01. But even if the agency does not treat the glading that way, the project still fails to comply because the proposed skiways and permanent approval of the Heritage Trail are clearly human-use components and would result in increased snow compaction. BA at 34.

Overall, the proposed action “could result in a degradation of structural suitability and effectiveness of habitat occurring within the SUP area, potentially affecting habitat connectivity for the species.” BA at 33. The BA also states that continued degradation of habitat has the potential to begin impacting habitat connectivity within the Iron Mountain LAU and between adjacent LAUs. BA at 53.

The potential effects of the proposed action on lynx and habitat are described at BA pp. 53-55. However, the permanent or long-term effect is likely greater than stated because the gladed areas may become unsuitable habitat.

Thus the proposal would not comply with numerous elements of the SRLA:

- It would not be consistent with HU O1 because the project would increase snow compaction in lynx habitat.
- It would not maintain connectivity, at least within the Iron Mountain LAU, and thus would not meet SRLA Objective ALL 01 or Standard ALL 01.
- It would not meet Guideline G1, which requires maintaining coarse woody debris in inter-trail islands.
- It would not meet Guideline G3, as it would not provide for lynx movement or maintain habitat effectiveness, given the additional human use in glades and other vegetatively treated areas.
- It would not meet Objective Veg 01, as it would create de-vegetated areas and thus not mimic or approximate natural succession and disturbance processes.
- It would not meet Objective Veg 02, which requires providing dense horizontal cover for high densities of snowshoe hare.

D. The Forest Service should clarify ESA consultation.

The DEA should clearly state whether the Forest Service consulted with the U.S. Fish and Wildlife Service regarding the effects of this project on Canada lynx and proposed critical habitat. If consultation has not occurred, it must occur before any decision is made. If consultation has occurred, the DEA should disclose the consultation record and explain how the agency addressed the effects of glading, snow compaction, increased human use, and habitat fragmentation.

VII. Conclusion

The likely impacts of the project on lynx and habitat are unacceptable as currently proposed. Lynx habitat, especially proposed critical habitat, must be conserved. The project should be redesigned to greatly reduce impacts to lynx habitat, wetlands, soils, and forest structure.

Tethered logging methodology should be analyzed through a supplemental EIS to the original SBEADMR decision that adequately addresses the impacts of tethered logging in the GMUG, including in the proposed project area.

The larger areas of current habitat, such as the unit under Lift 10 and the unit between Lifts 4 and 5, should not be entered except as needed to remove hazard trees that could fall onto existing ski runs or lift infrastructure. Wetlands should be avoided. The High Camp restaurant expansion should be removed or deferred unless the Settlement Agreement is properly modified.

The Forest Service should withdraw or substantially revise the DEA. The revised analysis should include a conservation alternative, a reduced-glading alternative, a lift-replacement-only alternative, a wetland-avoidance alternative, a settlement-compliance alternative, and a phased alternative. If the agency cannot show that the project will not have significant effects, it should prepare an EIS.

Sincerely,

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