



**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

Sheep Mountain Alliance (SMA) offers the following scoping comments on the proposed Telluride Mountain Club (TMtC) trails proposal 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 Mountain Club and the U.S. Forest Service for working with us over the past months to discuss the proposal and to ensure that a NEPA process is conducted. In our comments, we address specific concerns that we have regarding impacts to wildlife, considerations about infrastructure, and the range of alternatives to be considered. We suggest providing additional alternatives that include seasonal closures to allow wildlife to move freely throughout the landscape.

Cumulative Impacts

The Telluride Trails proposal would design and construct over fifteen miles of new trails, and rehabilitate approximately five miles of trails. Many of the trails within this proposal build upon existing trail infrastructure, adding a variety of recreational features to the regional landscape. The trails within this proposal improve connectivity, which will inherently increase the number of recreationalists, diversity of recreationalist groups, and the density of trails existing on U.S. Forest Service land.

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.

Telluride Mountain Club's proposal presents an opportunity for expanded, non-motorized recreation that is either close to human development, existing recreation corridors, or both. Channeling recreation growth into managed areas in close proximity to communities and existing infrastructure 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.

Range of Alternatives

Federal agencies must “study, develop, and describe appropriate alternatives to recommended courses of action in any proposal which involves unresolved conflicts concerning alternative uses of available resources¹.” Specifically for an EA, Federal Agencies must “include brief discussions of the need for the proposal, of alternatives as required by section 102(2)(E), of the environmental impacts of the proposed action and alternatives, and a listing of agencies and persons consulted.²” Although an agency must still “give full and meaningful consideration to all reasonable alternatives' ' in an environmental assessment, the agency's obligation to discuss alternatives is less than in an EIS. Id. “The existence of a viable but unexamined alternative renders an [EA] inadequate.” *Westlands Water Dist.*, 376 F.3d at 868 (quoting *Morongo*, 161 F.3d at 575)³.

While it is not uncommon for an outside entity to propose recreational trails, analysis of alternatives outside of this proposal, including a no action alternative must be undertaken. Given the increasing importance of protection of wildlife habitats and corridors, this proposal's proximity to existing trails, and the importance of conservation in this heavily traveled area, a conservation alternative should be considered and analyzed.

Impacts to Wildlife

The Telluride region is a haven for many species of wildlife, including elk, lynx, mountain lion, mule deer, red fox, coyote, among numerous others. The impacts of trails on wildlife are varied, and depend on length of trail, type of use, seasons used, and frequency of use. Literature documenting the negative impact of human recreation on wildlife species is growing, and includes the following data as cited in each publication.

Michael J. Wisdom, et al. Elk responses to trail-based recreation on public forests. Forest Ecology and Management 411 (2018) 223–233.

¹ 42 U.S.C. 4332(2)(E)

² 40 C.F.R. § 1508.9(b)

³ *W. Watersheds Project v. Abbey*, 719 F.3d 1035, 1050 (9th Cir. 2013)

This study indicates that elk avoid trails and recreational use of trails, and that all types of recreation negatively impacts wildlife. The response of elk to type of recreational use varied, with ATV use having greater impacts than mountain bike use, which in turn is greater than horse and hiking use. There was also evidence that elk indirectly avoid the presence of trails; the mean distance of elk from trails without recreationists being present was 239-310 meters, while the mean distance of avoidance from ATVs was 879 meters, 662 meters from bicycles, 558 meters from horses, and 547 meters from hikers. CPW staff has stated this study provides the new standard they are using to measure the 'zone of influence' of trails. The study states: "Our results support the hypothesis that elk avoid trail-based recreation similarly to their avoidance of roads open to motorized traffic on public forests. Forest managers can use results to help optimize trade-offs between competing objectives for trail-based recreation and wildlife species like elk that are sensitive to human activities on public forests."

Audrey R. Taylor and Richard L. Knight. Wildlife Responses to Recreation and Associated Visitor Perceptions. Ecological Applications, 13(4), 2003, pp. 951–963.

Taylor and Knight investigated the interactions of wildlife and trail users (hikers and mountain bikers) at Antelope Island State Park in Utah. A hidden observer using an optical rangefinder recorded bison, mule deer, and pronghorn antelope response to an assistant who hiked or biked a section of trail. The observer then measured wildlife reactions, including alert distance, flight response, flight distance, distance fled, and distance from trail. Observations revealed that 70 percent of animals located within 330 feet of a trail were likely to flee when a trail user passed, and that wildlife exhibited statistically similar responses to mountain biking and hiking. While Taylor and Knight found no biological justification for managing mountain biking any differently than hiking, they note that bikers cover more ground in a given time period than hikers and thus can potentially disturb more wildlife per unit time.

Leslie M. Naylor and Michael J. Wisdom. Behavioral Responses of North American Elk to Recreational Activity. J. of Wildlife Management, 73(3):328-338 (2009).

In a controlled experiment, the behavioral changes by 13 female elk were monitored in response to four types of recreational disturbance: all-terrain vehicle riding, mountain biking, hiking, and horseback riding. Compared to control periods when elk spent most of their time feeding and resting, travel time increased in response to all recreational disturbance, but decreasing in the order listed above (i.e. ATV use eliciting the greatest increase in travel time, horseback riding eliciting the least). Both mountain biking and hiking activities were found to significantly reduce resting time for elk.

Brett P. Wiedmann and Vernon C. Bleich. Demographic Responses of Bighorn Sheep to Recreational Activities: A Trial of a Trail: Bighorn Sheep Responses to Recreation. Wildlife Society Bulletin 38, no. 4 (December 2014): 773–82.

This long-term study indicates bighorn sheep declined at the population level in response to the creation of a new trail open to mountain bikes (the Maah Daah Hey Trail in North Dakota, an IMBA Epic mountain bike trail). The significance of this study is that it documented that trail recreation can result in negative impacts at the population level, not the individual animal level.

David Jachowski, et al. Human Disturbance and the Physiological Response of Elk in Eastern Washington. Wildlife Biology in Practice 11, no. 1 (2015).

The authors studied elk fecal glucocorticoid metabolite (FGM) levels in three different areas to compare elk living in a natural area with those exposed to human disturbance (including road networks). After accounting for seasonality and other factors, elk in more disturbed areas showed consistently higher FGM levels, suggesting they were physiologically affected by greater stress. The human-induced stress was of sufficient magnitude to exceed any season or climate-based effects.

Colorado Parks and Wildlife (2018). Principles for Advancing Outdoor Recreation and Conservation.

CPW has adopted the seven “Principles for Advancing Outdoor Recreation and Conservation.” Principle #4 states: “All recreation has an impact. Coloradans have an obligation to minimize these impacts across the places they recreate and the larger landscape through ethical outdoor behavior.”

Colorado Parks and Wildlife (2015). Colorado State Wildlife Action Plan.

Human intrusions and disturbance/recreational activities are listed as one of the 14 major threats to biodiversity in Colorado. Recreational use is listed as a threat to many of the species of greatest conservation need.

Colorado Parks and Wildlife Wild Lands and Wildlife Report

The report provides an excellent overview of the impacts that recreation has on big game habitat, and is summarized well here: “Habitat effectiveness is a result of how big game responds to recreation activities on roads and trails. Contrary to popular opinion, elk and deer generally do not habituate to hiking or mountain biking (Wisdom et al 2004, Wisdom 2018, Taylor and Knight 2003, Naylor et al. 2009). Impacts to wildlife from trail use are often negative and are associated with increased direct disturbance and displacement from optimal habitat (Larson et al 2016). Avoidance of recreationalists effectively decreases the habitat capability or carrying capacity of an area (Taylor and Knight 2003). The location of recreation activities has a significant effect on the magnitude of the impact. For big game, the greatest impact occurs when those activities occur within seasonal concentration areas and production areas, as well as the migration corridors and routes connecting those areas.⁴”

⁴ https://www.backcountryhunters.org/report_-_gmug_report

Further Wildlife Considerations

These landscapes also provide habitat for numerous Forest Service sensitive species, including brewer's sparrow, pine marten, boreal owl, northern goshawk, three-toed woodpecker, and others. The Forest Service should also consider potential impacts to raptors. Colorado Parks and Wildlife developed recommended buffer zones and seasonal restrictions for Colorado raptors in 2008. The agency recommended seasonal restrictions on human encroachment within a one-half mile radius of active nests from March 1 to September 15.

Canada lynx and Canada lynx habitat are present in and around the proposal areas. Areas in the East End of San Miguel County are abundant with lynx and high quality lynx habitat. Because it is listed as threatened under the Endangered Species Act, the Forest Service must adequately consider the effects of the proposal on the species and its habitat. The effects of new trail construction, mechanized use, and increased human activity on lynx facilitated by a Forest Service decision must be disclosed, analyzed, and addressed. This includes analysis of noise and human presence that could result in displacement of lynx living in or traveling through areas in the proposal. Canada Lynx and Canada Lynx habitat is present in the proposed "Sheep Mountain Traverse" trail. Due to the Canada Lynx's threatened status under the Endangered Species Act, the USFS must adequately consider the effects of the proposed trail on the species and habitat⁵. This includes the effects of new trail construction, increased human activity through noise and presence, and new habitat fragmentation. The proposed trail accesses entirely new subalpine terrain, and our concerns are outlined through the specific Southern Rockies Lynx Amendment (SRLA) management guidelines for human use projects. Specifically, we believe this proposed trail does not fit within the following guidelines:

- Objective HU 03: Concentrate activities in existing developed areas, rather than developing new areas in lynx habitat.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.⁷

While many of these conflicts at the human-wildlife interface are inherent to increasing recreation in the region, we urge the agency to carefully consider a wide range of options for managing the human-wildlife interface. In addition to carefully considering where new trails make sense on the landscape, we suggest that concepts such as strict seasonal closures, non-mechanized use, and proper trail infrastructure may act as methods for reducing negative impacts of increasing recreational infrastructure on wildlife populations.

Specific Trail Comments

Mountain Village to Valley Floor Singletrack Connector

Currently, Boomerang trail provides the only trail linkage between the Valley Floor and Mountain Village. As a steeply graded, multi-use trail, it is heavily used and often results in conflicts between uphill and downhill users (particularly mountain bikers). Further analysis on recreational user conflict on the

⁵ 16 U.S.C. § 1531 et seq.

⁶ SRLA ROD 2008, attachment 1-6

⁷ SRLA ROD 2008, attachment 1-7

Boomerang trail and the USFS Wedge parcel must be done. Anecdotal evidence of conflict from limited user groups (mountain bikers) is not enough to warrant a completely new trail.

The new connector trail would further fragment wildlife habitat on the USFS Wedge parcel, and understand that this zone is heavily used by elk as a movement corridor between the Valley Floor and Mountain Village. As stated in our section discussing wildlife concerns, we believe other alternatives need to be analyzed as well.

South Side perimeter trail - Bridal Veil to Town Park

The South Side perimeter trail from Bridal Veil to Town Park presents very few concerns for SMA. It will provide greater connectivity between trail systems, and is within a highly trafficked area near Telluride. Its limited wildlife values present few conservation concerns. Clear signage and a sustainable build will be integral to the suitability of this trail.

Sheep Corrals to Sunshine Connector trail

SMA supports the construction of this short section of trail. It has limited impacts and will improve trail connectivity, and will improve safety and user experience for recreationalists in this area. We suggest appropriate signage be present at the trailhead area as well.

Sunshine Uphill trail

The Sunshine downhill trail has unfortunately turned into a less than ideal trail for user groups outside of mountain bikers. Erosion issues are also a concern, and trail design must consider this as well. This proposed uphill trail must be kept multi-use both in purpose and design.

Illium Flume Trail

This proposed trail is located on a strip of public lands that provide important habitat for big game; as such, the impacts to big game and all wildlife in this area must be considered in the NEPA analysis of this trail. We also have concerns of private and public land conflicts in this area and request that private landowners in this area are consulted.

Sheep Mountain Traverse (Option A and B)

The draft GMUG revised land management plan includes specific provisions for the proposed Hope Lake/Sheep Mountain special management area. As currently listed, the Hope Lake/Sheep Mountain special management area is classified as no for “mechanized suitability.” Which, as outlined in the draft plan, “Within motorized and mechanized suitability columns, “limited new” indicates that specific additional trails would, subject to site-specific, subsequent environmental analysis and decisions, be appropriate. “No new” indicates that existing motorized or mechanized use would be appropriate, but that no additional use would be permitted.”⁸ While the forest plan is currently in draft form, if the Hope

⁸ Grand Mesa, Uncompahgre, and Gunnison National Forests Draft Revised Land Management Plan pg 95-96

Lake/Sheep Mountain special management area is in the final plan, the proposed “Sheep Mountain Traverse” trail would be prohibited as its management falls under the no new mechanized trails designation.

The proposed CORE Act, and Sheep Mountain Special Management area prohibits “the use of motor vehicles, motorized equipment, or mechanical transport (other than as provided in paragraph (3))⁹” With current boundaries and as currently written, this provision would severely limit the ability of mechanized or motorized trail construction on the proposed “Sheep Mountain Traverse” trail. The current boundary of the proposed Sheep Mountain Special Management Area of the CORE Act, as well as the accompanying GMUG forest plan revision management area is from the 2005 Mountains to Mesas conservation management alternative. This plan was created from conservation groups across Colorado as a response to the 2005 GMUG forest plan revision. Originally titled “San Miguel,” at 10,394 acres, it was described as “As part of a large roadless complex that includes land on the adjacent San Juan National Forest, the San Miguel area exhibits a pristine alpine environment. Open meadows, brilliant wildflowers, steep slopes, jagged peaks, clear lakes and streams, and diverse wildlife, including Canada lynx, are all represented. The area offers excellent opportunities for solitude and quiet-use recreational activities.”

We appreciate the two options that are presented in this initial proposal. While one has implications with longstanding, community supported public land legislation, the other skirts the border. While boundaries are many times political or placed at certain distances from existing trails and roads, wildlife certainly does not discriminate against boundaries of a proposed special management area. It is difficult to see a path forward for this specific trail given the implications with the strongly supported CORE Act legislation, and the numerous impacts to Canada Lynx habitat.

Sunshine Mesa Backcountry Loop Rehabilitation

This network of existing trails must be analyzed for the proposed increase and expansion of users. Most specifically, for e-bikes and mountain biking. Alternatives should also include non-mechanized uses.

Sincerely,

Mason Osgood
Executive Director
Sheep Mountain Alliance

⁹ "Text - S.1634 - 118th Congress (2023-2024): Colorado Outdoor Recreation and Economy Act." Congress.gov, Library of Congress, 17 May 2023, <https://www.congress.gov/bill/118th-congress/senate-bill/1634/text>.