



May 22, 2018

United States Forest Service
c/o Forest Planning Team

RE: GMUG Forest Plan Revision: Scoping

To Whom It May Concern:

Thank you for the opportunity to provide comments in regard to the GMUG Forest Plan Revision scoping reports. The Telluride Mountain Club (TMTc) is a nonprofit organization based out of Telluride, CO that advocates for safe, accessible, enjoyable and respectful opportunities for human-powered recreational activities in the Telluride region, through education, awareness and collaboration. Over the past year, TMTc has been dedicated to helping Telluride's trail system, creating improvements at various local rock climbing routes, protecting outdoor recreation opportunities, and partnering with regional entities (including the USFS) to create positive change in our community.

Telluride Mountain Club's Forest Plan Comments:

Part I: Forest Plan Vision, Roles and Contributions

The GMUG encompasses a vast region of public lands. A new and updated forest plan revision needs to take the roles and contributions outlined (public enjoyment, commodity use and community connections) and meticulously combine them into a well thought out and manageable plan. While Part I takes into consideration the current state of the GMUG, it does not necessarily predict trends of the future. It is incredibly important for a new plan to forecast what this area could look like in 20-plus years so that the plan is relevant when it will be in play.

The GMUG is a large area that is home to a diverse group of locals and visitors. Not only is this area growing with permanent residents, it is also seeing exponential growth in tourism. Overall, there are more people enjoying the GMUG region. A revised forest plan needs to acknowledge this increase in human interaction and put into place measures that will protect the GMUG for future generations. A few specific thoughts on this topic are as follows:

- Create streamlined processes for outside entities to be able to propose and execute upgrades on GMUG lands. An example would be an official process for new trail proposals. A streamlined process will eliminate guesswork for nonprofits like ourselves.
- Plan for and address future user conflict. With more user groups recreating in the same areas, there is likely to be an increase in conflict among different types of recreationalists (i.e. between mountain bikers and hikers, between non-motorized and motorized traffic, etc.). A forward-thinking plan will evaluate the GMUG lands, desires of the residents, and uses of tourists to problem solve future user conflict issues.
- A new forest plan should seek out progressive partnerships. Decreased funding, combined with an increase in GMUG visits is a worst-case scenario. Perhaps there are innovative ways to partner with regional entities to help with funding, management of lands, trail maintenance, etc.

Last, an updated GMUG forest plan should take into consideration and address as best it can the current trends of climate change. Locally in Telluride, we are seeing seasonal changes and therefore shifting recreation trends. As an example, falling snow was delayed this fall/early winter and has been melting fast this spring. As a result, people were recreating on our trails longer in the fall and have started using trails earlier this spring. If this continues to be a trend, how will it impact our trails (and other roles and contributions) and how can we plan for it?

Part II: Key Needs for Change

The outlined key needs for change do a good job of reflecting major issues we see today. A progressive forest plan should also take into consideration future needs for change based on trends we are experiencing and forecasts of the future. As it relates most to TMtC's mission statement, here are specific comments on the 'Contribute to Social and Economic Sustainability' section:

- As recreation increases, areas/trails in the GMUG will become more congested. An updated forest plan should progressively address user-created trails and establish a process to add these trails to forest inventory if they meet certain trail requirements and building standards. User-created trails currently carry a negative stigma, but these trails have often times been created for a reason (to disperse congestion, to establish a trail where there currently isn't one, to create a better route than exists, etc.) and could be an easy/more cost-effective way to obtain a new trail.
- An updated forest plan should give careful consideration to new motorized routes/regions in the GMUG. Many people enjoy this region to escape noise, pollution and other factors associated with motorized recreation. For those reasons, we ask that new motorized areas be minimal.

Overall, we think the key needs for change addressed in the scoping materials address what should be present in an updated forest plan. We stress the importance for this new plan to take into consideration possible future trends within the GMUG and allow for whatever unforeseeable trends or events may arise to be addressable via the forest plan.

Part III: Management Area Framework

The management area framework presented in the scoping materials does an adequate job at establishing the MA framework that is yet to be fully established. TMtC looks forward to reading more on these components when they are created.

The Telluride Mountain looks forward to staying involved with the GMUG Forest Plan Revision process and the next steps.

Thank you for your consideration,

Josh Borof

Josh Borof, Telluride Mountain Club President