



July 29, 2019

United States Forest Service
c/o Forest Planning Team

RE: GMUG Forest Plan Revision: Working Draft Comments

To Whom It May Concern:

Thank you for the opportunity to provide comments in regard to the GMUG Forest Plan Revision working draft. 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 working diligently on a Trails Sustainability Plan for the Telluride region. In addition, we do annual improvements at local rock-climbing routes, help protect outdoor recreation opportunities, and partner with regional entities (including the USFS) to create positive change in our outdoor recreation community.

Telluride Mountain Club's Forest Plan Working Draft Comments:

Recreation (REC)

The GMUG encompasses a vast region of public lands, enjoyed by many individuals and various forms of recreation. The 'Recreation (REC)' portion of the working draft document is very short and non-comprehensive. Below are our comments and concerns.

Objectives

FW-OBJ-REC-03:

This objective should include access portals to more than just 14,000-foot peaks. Population and tourism numbers are continuously growing across the GMUG (and particularly in Telluride) and trailheads to common/popular system-trails are in need of more and upgraded facilities. For many established trails (outside 14,000-foot peaks) in the Telluride region, proper parking and restroom facilities don't exist.

FW-OBJ-REC-04:

The working draft document states “maintain 500 miles of Forest Services trails...”. This number should take into consideration and include proposed and new trails in the GMUG. Let’s not restrict the mileage of trails to what currently exists.

Standards

FW-STND-REC-05:

Travel by bicycles is continuously evolving. Advancements in technology have allowed cyclists to go further than before, bike packing is gaining popularity and generally cyclists are becoming more creative. Without a proper definition of “designated system routes”, it’s hard to understand the extent of mechanized travel being restricted to this designation. The Telluride Mountain Club and our membership would argue that mechanized use (non-motorized mountain bikes) should be allowed on system-trails as well as social trails that exist within the GMUG.

With community population and tourism numbers on the rise, it’s more important than ever to disperse recreation near Telluride.

GMUG Working Draft Plan Map Comments:

High-Use Recreation Areas - MA 4.2 (HIREC)

Consider increasing the scope of the ‘High-Use Recreation Area’ management areas to accommodate future and increased recreation. Increases in recreation are occurring due to growth in community and tourism numbers. These broader ‘High-Use Recreation Areas’ are ideal candidates for new, future trails.

Additional Comments:

Create More Cohesive and Inclusive Trail Systems

Telluride Mountain Club has identified the need for more cohesive trail systems across the GMUG, particularly in the Telluride region. Cohesive and inclusive trail systems should include linked trails that create a broader system (more than one or two trail options), proper signage and familiarity among signage, trailheads, parking options, and effective trail maintenance plans. Well-rounded trail systems are necessary to improve recreation opportunities within the GMUG, allow for future growth of human-powered recreation, and sustain/protect the surrounding environmental areas.

Allow for Stacked Trails and Loops in Available Areas

Throughout areas of the GMUG, especially near Telluride, National Forest Lands are scattered with private property parcels, (difficult and) variety of terrain, and environmentally sensitive landscapes. For this reason, it is recommended that stacked and looped trails not only be allowed, but also encouraged in areas that can accommodate them. Consent to allow for more

than one trail in a specific area will broaden use for multiple recreation levels, help to establish “recreation hubs”, and accommodate more recreationalists, especially as community populations and popularity of recreation rise.

Reassess Seasonal Closures That Affect Recreation

Throughout the GMUG, various seasonal closures exist for trails and broader recreation zones. Telluride Mountain Club asks that you reassess these seasonal closures on an individual basis to ensure they are 100 percent necessary and that the seasonal closure dates are valid.

Additionally, we ask that the regional USFS offices provide clarity and transparency on what wildlife indicators determine season closures for individual areas and why the seasonal closure dates have been chosen. Seasonal closures are bad for continuity, recreation economics, and recreational as a whole. Many seasonal closures have likely not been looked at or readdressed for long periods of time. It is suggested that individual closures be reassessed every five years to ensure they continue to be relevant. This reassessment should include roads and trails currently closed to fat biking in the winter months, in addition to wildlife and other seasonal closures.

Plan for Sustainable and Enforceable Forest Management

Prioritize and balance the need for increased recreational opportunities with long-term protection of public lands, wildlife, watersheds, and ecosystem quality. Policies should allow for sustainable recreation growth while protecting the environment, watersheds, wildlife, water quality, wetlands, ecosystems, etc. This should also take into consideration future implications from climate change and future recreation shifts and trends.

Plan for Increased Use/Recreation Across the GMUG

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.

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.

We stress the importance for the new forest plan to take into consideration population and visitor growth, possible future trends (i.e. climate change) within the GMUG and allow for whatever unforeseeable trends or events may arise to be addressable via the forest plan.

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

Thank you for your consideration,

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