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November 18, 2021

United States Forest Service  
c/o Forest Planning Team

RE: GMUG Draft Revised Land Management Plan 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 Nordic Association (TNA) is a nonprofit organization dedicated to the education and enhancement of Nordic skiing for individuals of all ages and abilities in the Telluride Region. TNA professionally grooms and maintains trail systems for cross-country skiing at Priest Lake and Trout Lake under permit from the USFS.

Use of winter trails groomed by TNA at Priest Lake/Matterhorn and Trout Lake is up dramatically in recent years including a 24% increase last season. Congestion on the trails and lack of parking have both become a safety concern. Lack of adequate parking is a particular concern at the Lizard Head Pass trailhead for the Trout Lake RR Grade ([VIDEO LINK](#)).

The hazard is extreme on busy weekends and early season when the Trout RR Grade is the only groomed Nordic trail available in southwest Colorado. There is seldom enough parking along several widened sections of Hwy 145 adjacent to the trailhead. There is room for roughly a dozen vehicles to park on the north side of the highway. Users must cross the highway in ski boots. Hwy 145 at the trailhead has limited visibility in both directions and a 55 mph speed limit. Many regular users have witnessed close calls with high speed traffic.

A significant percentage of winter trail users like to ski, hike or snowshoe with their dogs. Hiking or snowshoeing in groups – especially with dogs is a safety concern for the majority of trails at Priest Lake. TNA regularly receives reports of collisions between skiers and dogs. TNA has a designated dog loop at Priest Lake which is often ignored. For years, TNA has been advised that the (current) Forest Management Plan does not allow any meaningful way to manage conflicting uses. We are hopeful the revised management plan (FW-STND-REC-08) provides additional tools in this regard.

The easiest way to mitigate conflicting winter trail uses would be an expansion of trails allowing dispersal of use. In 2015, the Norwood Ranger District allowed TNA to groom additional “demo” trails the meadows on the north side of the Trout RR Grade (see map below). The gently rolling terrain is ideal for Nordic trails and has the added benefit of easy access and fantastic scenery. TNA members rated the expanded trails as highly desirable. Unfortunately, TNA has not been allowed to groom them since 2015. There are also multiple opportunities for expanded trails in the San Juan Forest immediately west of the Trout RR Grade.

#### **Additional Comments on the GMUG Draft Revised Land Management Plan:**

**Objectives FW-OBJ-REC-05: Within 10 years, improve the accessibility at a minimum of five recreation sites:** It is certainly hoped that improved parking for Nordic and other winter uses can be accomplished in far less than ten years. TNA stands ready to partner with the USFS to facilitate solutions for parking at the Lizard Head Pass trailhead, including monetary assistance.

**Standards FW-STND-REC-08 (dispersed day use):** Several indicators of unacceptable social impacts currently exist during higher use periods at the Priest Lake / Matterhorn and Trout Lake winter use areas. TNA welcomes responsive management strategies for mitigation of impacts.

**Table 14. Roaded natural setting prescription for the desired summer and winter recreation opportunity spectrum:** TNA has been advised that under the current management plan, a warming hut would have to be temporary and removed at the end of each season. We are hopeful the Table 14 Winter Recreation Opportunity Spectrum opens the door to a permanent or semi-permanent warming hut / base facility at the Priest Lake / Matterhorn trailhead.

**Plan for Increased Use.** There is no reason to expect that accelerated growth in demand for winter trails will lessen in the foreseeable future. It is critical the new forest plan allows for adaptation to continued changes in population and visitor growth. Being locked in to an inflexible forest management plan for another decade or two is not an option.



**Trout Lake Nordic Trails**

The Telluride Nordic Association looks forward to continued involvement in the GMUG Forest Plan Revision.

Sincerely,

Bill de Alva

Board Member

Telluride Nordic Association