



November 24, 2021

United States Forest Service  
c/o GMUG Forest Planning Team

RE: GMUG Draft Forest Plan and Draft Environmental Impact (DEIS) Comments

To Whom It May Concern:

Thank you for the opportunity to provide comments regarding the GMUG Draft Forest Plan and Draft Environmental Impact. The Telluride Mountain Club (TMtC) is a nonprofit organization based in Telluride, CO, with a mission to advocate for safe, accessible, enjoyable, and respectful opportunities for human-powered recreational activities in the Telluride region, through education, awareness, and collaboration. TMtC has been working closely with the USFS Norwood Ranger District over the last several years to prioritize, plan, and execute trail projects in the Telluride region. In addition, TMtC does annual trail maintenance on USFS trails, hardware improvements at local rock-climbing routes, helps protect outdoor recreation opportunities on public lands, partners with regional entities to help preserve and enhance outdoor recreation in the community, and so much more.

The Draft Forest Plan and DEIS is a comprehensive document and comments for such a project are a massive undertaking, especially for an organization like TMtC that has never been part of a process like this. We apologize in advance if our comments are too general or appear repetitive. Our organization represents the Telluride outdoor (nonmotorized) recreation community, and our comments speak to high-level insights from those actively enjoying public lands.

Additionally, TMtC has signed on and supports the comments submitted by Outdoor Alliance (Re: GMUG Draft Revised Land Management Plan). The comments below expand on some topics and cover additional issues that impact our organization and membership.

Thank you for your hard work and dedication to this project and your consideration on the comments below.

### **Wildlife Management Area – MA 3.2 (WLDF)**

TMtC is concerned with the Wildlife Management Area trail density components. The science and research regarding the effects of trail-based recreation is inconsistent and inconclusive. Furthermore, it does not appear there is any methodology to how this density calculation will be enacted (regional grid vs individual units vs ?). Instead of using an outdated and scientifically questionable approach, TMtC suggests a progressive approach that looks at optimizing land uses within specific geographic areas and takes into consideration progressive planning that utilizes recreation hubs (or Recreation Emphasis Corridors). Several recent studies have found that outdoor spaces (campgrounds, dispersed camping), trails and public lands are more utilized than ever. Limiting recreation near established towns and popular recreation areas that need more trail and trailhead options opens the door to rogue, unsustainable, and user-created trails. The trail density component disregards population growth and unknown future recreation trends (i.e., how e-bikes are accommodated on the system and managed).

Allowing for more trail density in appropriate recreation-focus areas will allow for more protection and security for wildlife species in the greater region. This forest plan revision must take into consideration growing use, demand and shifts to the great outdoors. Limiting trails in relevant geographical areas is a disservice to today's users and future generations.

### **Recreation Emphasis Corridors – MA 4.2 (EMREC)**

TMtC (and many other organizations) has worked with Outdoor Alliance to identify several recreation emphasis areas where many different recreational uses are concentrated and receive more visitors than other areas of the GMUG, and we have identified areas that may see increasing use in the future. GIS data regarding these areas has been shared with the Planning Team via Outdoor Alliance. The Planning Team should review these areas and prioritize recreation emphasis areas that need to be managed for current and future use, so that recreation opportunities are sustainable, while preserving the health and integrity of the surrounding natural and cultural resources.

### **Trails (TRLS) - FW-DC-TRLS-01**

Thank you for including the “development of stacked/looped/stacked-loop trails are considered in appropriate areas and circumstances”. We suggest you add 'parallel' and 'directional' to meet/match the standards outlined in FW-STND-REC-07.

MA-GDL-EMREC-04: Guidelines for Recreation Emphasis Corridors shall be better utilized and communicated in the GMUG. TMtC is constantly told that parallel trails, stacked loops, and directional trails aren't allowed on public, USFS lands. In certain areas, we are already experiencing the standards outlined in FW-STND-REC-07 but are told we can't use the guidelines that are outlined in the draft plan. A more proactive approach needs to be applied in recreation emphasis areas and USFS employees need to be privy and open to implementation of these options when the new plan takes over.

## **Mountain Resorts – MA 4.1 (MTR)**

Please take into consideration free public (access) trails that originate within Mountain Resorts (ski areas) and feed into the larger public trail system. Specifically in the Telluride region, the Prospect Trail, a trail that has been around for over 15 years and was built with public funding is in jeopardy of becoming a paid trail via the Telluride Ski Resort bike park. Historical, free, public access trails should not be “given” to ski resorts out of ease of management moving forward. Historical free public trails should remain free public trails in perpetuity. The forest plan shall acknowledge and add that once a trail is added to the system as a free, public access trail, it shall always remain accessible and free, especially when it is paid for with public funding!

## **General Comments**

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, looped, parallel, and directional 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 (or more than 1-mile of trail in a square mile grid) will broaden use for multiple recreation levels, help to establish Recreation Emphasis Corridors and accommodate more recreationalists, especially as community populations and popularity of recreation increase.

It is imperative that recreationalists across the GMUG maintain all current access and forms of access to public lands during the transition of the forest plan. It would be detrimental if access to public lands was taken away during this process. TMtC encourages you to maintain all current access and access that is currently in the planning process (i.e., new trails going through the NEPA process that have been approved by the USFS regional offices). Trail planning is both expensive and time consuming. It would be damaging to TMtC, our membership, and donors if access or current projects were lost because of the forest planning process. Additionally, we encourage the type of access to withstand the planning process.

Trail usage has increased threefold in the United States since the coronavirus pandemic hit in early 2020, according to data from AllTrails, a provider of crowdsourced information on trails of all kinds (source: [https://www.washingtonpost.com/lifestyle/travel/trail-workers-builders-outdoor-recreation-hiking/2021/09/15/195ff6f2-0feb-11ec-bc8a-8d9a5b534194\\_story.html?fbclid=IwAR1KNedLZjA0hBytEnypBn2\\_YLE4Kr8RbdH\\_Kpmo4w47GMORncNs0U5SfTk](https://www.washingtonpost.com/lifestyle/travel/trail-workers-builders-outdoor-recreation-hiking/2021/09/15/195ff6f2-0feb-11ec-bc8a-8d9a5b534194_story.html?fbclid=IwAR1KNedLZjA0hBytEnypBn2_YLE4Kr8RbdH_Kpmo4w47GMORncNs0U5SfTk)). TMtC is concerned that the draft forest plan doesn't take into consideration this key fact and trend. Trails and systems will likely need to accommodate a larger number of users in the future. Stacked trails, loops, parallel trails, and directional trails should be an upfront possibility in certain geographic zones (i.e., Recreation Emphasis Corridors) and not just a remedy once there are problems. As we all know, trail planning is a multi-year process. Waiting to solve problems is not an innovative approach to recreation and land management.

TMtC is curious what thought has been given to e-bikes and their future use and management on USFS trails. TMtC has heard that this topic is currently being addressed at the USFS and that

there is likelihood certain class e-bikes will be allowed on non-motorized trails in the near future. This needs to be seriously considered in the plan. Demand, use, and capabilities will skyrocket when e-bikes are allowed on non-motorized trails. Is the GMUG prepared to accommodate this new and growing recreation segment? What kind of innovative solutions can help? This should be addressed in the new forest plan.

Additionally, what Recreation Opportunity Setting category/categories will accommodate e-bikes and which classes? This needs to be considered and addressed as the grey area between motorized and non-motorized becomes blurrier and more complicated.

With more people than ever accessing public lands, education and stewardship-awareness components should be a priority. How does the GMUG plan to educate new users of public lands on proper etiquette? What kind of innovative marketing can be used to educate users? The forest plan revision should take into consideration new ways to reach users (signage?) and educate them on proper stewardship etiquette (i.e., toilet paper is trash, pack it out; share the trail; leave no trace; etc.).

The draft forest plan does not (unless we missed it) address non-motorized user-created trails or establish a process to add these trails or understand how these trails can be better fit into a sustainable, proactive trail system that meets the needs of the community. Of course, these trails would only be added to forest inventory if or when they meet certain trail criteria and building standards and go through the property NEPA analysis. User-created trails currently carry a negative stigma, but these trails have (often) been created for a reason - to disperse congestion, to establish a trail where there currently isn't one, but the need is high, to create a better route than exists, etc., and could be an easy/more cost-effective way to add new, desirable, and needed trails to the system. Adopting user-created trails should be addressed in the forest plan revision as a viable option.

Does the draft plan adequately take into consideration future implications from climate change and potential recreation shifts and trends? As weather events become more unpredictable, it is important to consider a recreation landscape that is different from the historical past. We are not climate scientists, but we urge the forest planning team to creatively allow for possible shifts in recreation trends (winter to summer) and seasons.

Last, TMTc prioritizes a balanced need for increased recreational opportunities with long-term protection of public lands, wildlife, watersheds, and ecosystem quality. We support policies allowing for sustainable recreation growth while protecting the environment, watersheds, wildlife, water quality, wetlands, ecosystems, etc. We are pro recreation in a sustainable setting.

### **Active Trail Planning**

TMTc has been involved with trail planning since 2015 and submitted our first trail proposal in 2017. We are constantly checking in with the community to understand the public's visions for

Telluride's trails (learn more about our latest efforts here: <https://www.telluridemountainclub.org/telluride-regional-trails-survey-2/>). TMtC will use the survey responses to guide future planning, projects, priorities, and so much more. The club is interested in supporting the community's vision, not creating its own. In addition, we keep three active infrared counters on popular trails in the area. We have identified that use has grown.

Based on data and community feedback, TMtC is actively working with the Norwood Ranger District on identifying sustainable locations for new trails that address connectivity of the existing "system", ability level needs, and disbursement options as use and popularity increase. These future proposals are thoughtful, experience focused trails that build upon the national recreational trends of improving accessibility and connectivity, minimizing wildlife impacts, and managing the growth of recreation.

The following zones have been identified as leads for potential new trails and strategic trail improvements. TMtC asks the forest planning team to take these areas into consideration if ROS changes are being considered. As of today, these trails are viable options in their locations based on current ROS inventory. Please do not make any changes to the ROS zoning that would impact the new trails to exist sometime in the future.

Existing Trails Needing Improvements with focus on improved sustainability and specific use focus: Hope Lake Reroute, Jud Wiebe Reroute, Deep Creek Reroute, Sunshine Mesa Trails rehab (and shift to mountain bike optimization)

Adoption of User-Created Trails with sustainability improvements: Hawn Mountain Trail Easement and Adoption, Hidden Lakes downhill trail adoption and sustainable reconstruction

New Trail Proposals to meet growing user needs, improve connectivity and better distribute use: Hidden Lake uphill to create sustainable loop, Magic Meadows additional loops and connectors, Sheep Mountain Traverse, Mill Creek Bypass, Flume Trail, Mountain Village to Valley Floor Connector Trail

You can see geographic locations of these conceptual trails on the map below.

We stress the importance for the new forest plan to take into consideration population and visitor growth, current trends (increased visitation and use), and possible future trends (i.e. climate change, e-bikes) within the GMUG.

The Telluride Mountain looks forward to staying involved with the GMUG Forest Plan Revision process and remaining a strong and dedicated partner to the Norwood Ranger District.

Thank you for your consideration,

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