Telluride Mountain Club

October 30, 2023

United States Forest Service
Grand Mesa, Uncompahgre and Gunnison National Forests
c/o GMUG Forest Planning Team
Submitted via Objection Portal at
https://cara.fs2c.usda.gov/Public/CommentInput?project=51806

ATTN: USFS Responsible Official
Chad Stewart
Grand Mesa, Uncompahgre, and Gunnison National Forests Headquarters
2250 South Main Street, Delta, CO 81416
970.874.6674

RE: Grand Mesa, Uncompahgre and Gunnison National Forests Revised Land Management Plan and Final Environmental Impact Statement - GMUG National Forests Plan

Dear GMUG Forest Planning Team & Chad Stewart,

Telluride Mountain Club (TMtC) and Outdoor Alliance (OA) are objecting to portions of the revised Forest Plan for the Grand Mesa, Uncompahgre, and Gunnison (GMUG) National Forests, final EIS, and draft Record of Decision that was noticed on August 30, 2023, with publication of the legal notice in the Grand Junction Daily Sentinel. Forest Supervisor Chad Stewart is the responsible official for the GMUG plan revision. TMtC filed draft plan and DEIS comments on 11/25/2021, working draft plan comments on 7/29/2019, and draft assessment comments on 12/04/2017. Outdoor Alliance and TMtC filed joint comments on the draft plan on 11/22/21 and co-authored the Outdoor Alliance GMUG Vision V2 proposal (August 2020).

Lead Objector:
Telluride Mountain Club
Heidi Lauterbach, TMtC Director
telluridemountainclub@gmail.com

Lead Objector if Heidi is unable to perform her duties:
Telluride Mountain Club
Josh Borof, TMtC President
telluridemountainclub@gmail.com

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. TMtC does annual trail maintenance on USFS trails, hardware improvements at local rock-climbing routes, helps protect outdoor recreation opportunities, partners with regional entities to help preserve and enhance outdoor recreation in the community, and so much more. The new Forest Plan is incredibly important to our mission, vision, the future of Telluride's outdoor recreation, and the membership/donor base we represent.

Outdoor Alliance is a coalition of ten member-based organizations representing the human powered outdoor recreation community. The coalition includes Access Fund, American Canoe Association, American Whitewater, International Mountain Bicycling Association, Winter Wildlands Alliance, The Mountaineers, the American Alpine Club, the Mazamas, Colorado Mountain Club, and Surfrider Foundation and represents the interests of the millions of Americans who climb, paddle, mountain bike, backcountry ski and snowshoe, and enjoy coastal recreation on our nation's public lands, waters, and snowscapes.

TMtC and OA appreciate the enormous task of creating the GMUG Forest Plan, Environmental Impact Statement, and Record of Decision. We see that many of our past comments and those from public input have been integrated into the plan and thank you. However, we believe there is still an opportunity for plan refinements as outlined below.

TMtC and Outdoor Alliance object on two major components of the Final Plan, including the route density standard for Wildlife Management Areas and Winter ROS settings for a specific area in the Norwood District.

Wildlife Management Areas (WMAs)

Our concerns with the application of Wildlife Management Areas relate directly to the following components of the plan revision:

1. Management Area Direction for Wildlife Management Areas, specifically MA-DC-WLDF-01 and MA-STND-WLDF-02 (Final Plan, pp. 118-119).
2. Footnotes Regarding Best Available Scientific Information for Wildlife Management Areas (MA 3.2) (Final Plan, Appendix 12, 12-9 to 12-13).
3. Affected Environment and Environmental Consequences: Habitat Connectivity (Final Environmental Impact Statement, Vol 1, pp. 319-337).

We object to the new trail density model of 1 mile per square mile as a single management approach to all Wildlife Management Areas.

The Wildlife Management Area route density maximum is overly restrictive for human-powered trail-based recreation, does not consider site specific needs, and is not informed by the best available science.

To address our objection, we request that each Wildlife Management Area (polygon) should be analyzed on a site-specific basis under a separate National Environmental Policy Act (NEPA) analysis; a one size fits all approach across all GMUG WMAs is not an appropriate management tool. At minimum, the EIS and Final Plan documentation must clarify that the route density standard is or would be applied as an average across the entire polygon.

Inconsistency with law, regulation, and policy:

The 2012 Planning Rule directs the Forest Service to use the best available scientific information when revising a plan and publish what information was used, why it was used, and how the information was applied to the issue (36 CFR §219.3).

The Final Plan failed to justify how peer-reviewed science on route density standards for roads can be applied in the same manner to human-powered recreational trails. Multiple papers cited in the Draft and Final Plans indicated that more research is needed to determine the effects of trail-based recreation on wildlife, including the following cited papers in the plan: Wisdom et al., (2015) and Rogala et al. (2011).

Only one paper provided in the Draft Plan (Canfield et al, 1999) and one paper provided in the Final Plan Response to Comments document (Lyon, 1983) made recommendations for limiting route density to the 1 mi./1 mi.^{2}, and both of these studies were specifically regarding roads, not trails. Additionally, CPW's own recommendation for 1 mi./1 mi.^{2} in the Route Density Primer is within the section on roads and *does not* specify trails in their recommendation in the first paragraph under Route Density. CPW later refers to "route densities", that they claim include trails.

The Forest failed to share the GIS tool and analysis that was used to calculate existing route densities until October 26 and still has not published which trail and road shapefiles were used in the route density analysis. This makes it impossible for groups like Telluride Mountain Club and Outdoor Alliance to adequately review the route density analysis done in ArcGIS. It is possible that the data used by the Forest omits certain trails, which would lead to inaccurate results published in Table 98 of the Final EIS. It is evident from the ArcGIS tool that the methodology used is inconsistent with how it is described in the Final Plan. The tool indicates that a 908m search radius was used, while the Final Plan states that a 1.5 mi. search radius was used. Additionally, it appears the Forest Service created a custom tool, rather than simply using the existing line density tool as described in the Final Plan (Final Plan, App. 12).

Clarification is also needed regarding the application of the route density as an average across each polygon. According to the Response to Comments document, WMA route density is an average across the polygon rather than a maximum for each square mile (Response to

Comments, 88). However, nowhere else in the Final Plan or Final EIS is this stated, leading the reader to believe that it is a standard to be applied to every square mile. The Final Plan, at minimum, must clearly state the WMA route density is an average of 1 mile per square mile across the entire WMA, rather than a maximum for each square mile.

The Colorado Trails with Wildlife in Mind Task Force provides robust evidence for adaptive management approaches that could be applied through site-specific analysis instead of the blanket trail density model:

- *Colorado's Guide to Planning Trails with Wildlife in Mind* includes adaptive management techniques that can be applied to help avoid overly restrictive or not-restrictive-enough management. Again, instead of using a one size fits all approach, each WMA should be evaluated and managed independently.
- *Colorado's Guide to Planning Trails with Wildlife in Mind* has several considerations for wildlife impacts, and important specifics are stated in Appendix A on page 8 of this document. Instead of using a single management approach for WMAs, each should be considered singularly based on the sensitivity of the disturbed habitat, current routes that exist, and restrictions / seasonal closures that could mitigate the wildlife impacts. Per the same document, there are complications with route density, as topography has an influence which is not accounted for in the calculation, and route density does not account for spatial distribution. A blanket trail density model of 1 mile per square mile is a blanket approach that has not been tested or reviewed on any forest. WMAs should be evaluated singularly based on the various factors present in that specific area and supported by NEPA analysis.

Prior Comments Link

Telluride Mountain Club and Outdoor Alliance co-authored comments on this issue during the 2021 Draft Plan comment period. These comments were dated November 22, 2021, and submitted via the public comment portal. Pages 24–31 of Outdoor Alliance's Draft Plan comments are dedicated to substantive comments on the designation and management of Wildlife Management Areas, including a robust review of the scientific information referenced in the Draft Plan.

From TMtC's 2021 draft plan and DEIS comments:
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).

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.

San Bernardo Wilderness Addition (North), San Bernardo Wildlife Management Area

The San Bernardo WMA is one example of how each polygon needs to be managed on a site-specific basis. This area is adjacent to Trout Lake (a very popular recreation area and popular summer home location), Matterhorn Campground (one of the region's frequented designated camping areas), San Bernardo (a local housing community with mostly full-time residents), and access to Lizard Head Pass, Hope Lake, and other recreation opportunities via trail connectors and roads. In addition to what currently exists, there are plans by San Miguel County to add affordable housing next to San Bernardo, and the Norwood District USFS has plans to improve Matterhorn Campground.

With these items in mind, a non-motorized trail loop, originating from the campground (across from the housing communities and with links to Trout Lake where possible), would be an excellent addition to this area when the infrastructure is in place and planning completed. TMtC has had meetings with the Norwood District USFS, which agrees that this is an ideal location for a trail in the future. However, if a blanket trail density model is applied, the best alignment and trail plan for this polygon would likely not be possible. The need for trails in this specific area is obvious and demonstrated in part by the proliferation of user-created trails in the area. The draft WMA for this area does not provide for future trail development, and this is just one additional reason we are objecting to the blanket trail density component in WMAs. Again, we believe it is best to evaluate each on an individual polygon / area basis by way of NEPA analysis or other mitigation techniques (closures, consolidations, restrictions, etc.).

Yellow Mountain Wildlife Management Area

The Yellow Mountain WMA is another example of why each WMA should be managed and evaluated individually. Currently, TMtC is proposing a new trail on the edge of this polygon, the "Sheep Mountain Traverse." The trail would start at the old Trestle parking area past Trout Lake and connect higher in elevation to the camping area at the top of Lizard Head Pass. This is an important singletrack connector for the greater trail system and could help disperse recreation when the USFS improves the camping at Lizard Head Pass. The most sustainable alignment option would meander just inside the WMA, possibly not making the trail possible with the current route density model. It is possible that the ideal alignment and trail could act as the future boundary of the WMA. Trails like this are important for helping communities experience the benefits of conserved lands, for the long-term benefit of conservation and wildlife. In this case, consolidation, possible seasonal closures, and proactive/collaborate management would create a more flexible and appropriate wildlife management regime.

Prior Comments Link
From TMtC's 2021 draft plan and DEIS comments:
Active Trail Planning
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.

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

GMUG Winter ROS Preferred Alternative

Bear Creek, Bridal Veil, North Ophir as Semi-Primitive Motorized Winter ROS: We object to Bear Creek, Bridal Veil, and North Ophir as being Winter ROS Semi-Primitive Motorized.

The Bear Creek drainage, Bridal Veil, and the south-facing terrain north of Ophir all encompass active, and often dangerous avalanche terrain. In TMtC's history, this terrain has been accessed and used by backcountry skiers/snowboarders and Telluride Helitrax. These areas exhibit high alpine-sensitive ecosystems and provide quality backcountry skiing experiences (from the Town of Ophir and side-country access from Telluride Ski Resort). If these areas are open to public assess with over-snow vehicles, avalanche safety and user conflicts will become a tremendous issue. The topography is steep, features and drainages are stacked on top of each other, and safe egresses don't really exist. If over-snow vehicles are also in that terrain, there will be safety issues with terrain management, avalanche safety, and user compatibility that will ultimately lead to conflicts and hazardous scenarios. Additionally, parking in an already congested winter parking situation, specifically in Ophir, will become very problematic, as no winter USFS parking lot currently exists.

Suggestion for Improvement:

Modify the Bear Creek, Bridal Veil, and North Ophir Winter ROS designation to Semi-Primitive Non-Motorized with the following stipulations:

- Allow the local District Ranger to manage the zone for permitted motorized uses, and
- Allow Telluride Helitrax to operate with their historical/current permit in this area.

TMtC suggests making a differentiation between motorized over-snow vehicles and helicopters for this specific management area (and potentially others as needed). TMtC strongly supports Telluride Helitrax continuing their permitted use in this area. Telluride Helitrax makes minimal impact with their operation and terrain use and provides important avalanche safety mitigation and rescue operations to the community and County. Telluride Helitrax operates in the area south of Ophir, which is designated as semi-primitive non-motorized, so it should not be a problem to allow them to continue operating in this area with a new designation.

Prior Comments Link

From TMtC's 2021 draft plan and DEIS comments:

General Comment

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.

From TMtC's 2019 draft assessment comments:

Motorized and Non-Motorized Recreation

TMtC is concerned that once specific trails and recreation areas allow for motorized recreation, it will be more difficult to restrict or alter this kind of access in the future. TMtC acknowledges that there are two trail user groups that both want an increase in outdoor recreational opportunities. We ask that very careful consideration is given to new motorized routes. Many local residents, second homeowners and tourists visit the Telluride region to escape loud noise, pollution and other factors associated with motorized recreation. They come here to enjoy peace and quiet, clean air and our beautiful mountains. It would be a shame to add more noise and pollution to the incredible wild places in our backyard.

* * *

Thank you for your consideration of the above objections and suggestions for improvement. TMtC and OA value the USFS and our partnership with the local Norwood District office and personnel. We appreciate the opportunity to voice our objections to help create a sustainable landscape while projects and implementation evolve into the future.

Thank you for your consideration,

Heidi Lauterbach & the TMtC Board of Directors
Telluride Mountain Club

Louis Geltman
Vice President for Policy and Government Relations
Outdoor Alliance

APPENDIX A

Notes from *Colorado's Guide to Planning Trails with Wildlife in Mind* (https://cpw.state.co.us/Documents/Trails/Planning_Trails_with_Wildlife_in_Mind_full_plan.pdf)

The document suggests minimizing strategies for trail impacts and has three different strategies to consider:

- Consolidate high density trail networks and recreation facilities in less sensitive or already disturbed habitats.
- Limit route densities within high priority habitats to an average of 1 linear mile of road or trail per total square mile for the species indicated in the best management practices table.
- Restrictions may also be needed, such as seasonal trail closures or dog limitations.

Depending on the existing levels of disturbance, habitat type, wildlife sensitivity, and intended trail use(s), one strategy may be more applicable than the others. For example, higher route densities may be appropriate in areas already impacted by development or located outside of high priority habitats; whereas low route density may be appropriate or required, to maintain the effectiveness of large blocks of unfragmented or sensitive habitat areas.

Further, the document states: There are two important considerations to keep in mind with route density:

*Site-specific factors, such as topography, may influence the quality of habitat, and are not accounted for in the calculation for route density.

*Route density calculations do not necessarily account for how trails are spatially distributed across the landscape.

The overarching intent of the route density consideration is to minimize habitat fragmentation and loss of habitat functionality for wildlife. It is important to note that this consideration is meant as a starting point for conversation about how to minimize wildlife impacts, and is not regulatory in nature. Also, route density only applies to specific high priority and sensitive habitats and species – there are many areas in the state where it isn't. Consultation with local agency staff and on the ground evaluation of the habitat are important to avoid any misapplications of route density. Remember that these strategies are part of a larger suite of BMP recommendations; it's always important to consider how other strategies can be applied to minimize and/or mitigate impacts on wildlife.