

Grand Mesa, Uncompahgre, and Gunnison National Forests

Forest Plan Revision Comments

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GMUG Area: San Juans

Resources: Recreation and Infrastructure

Background: I serve on the board of the Telluride Nordic Association (TNA), having served on the board since 2003, former board president and have maintained an active (primary) role in management of Nordic trail grooming including trails at Priest (Matterhorn) and Trout Lake under permit with the USFS. I attended the July 23, 2017 Forest Plan open house at the Wilkinson Library and participated in the August 22, 2017 webinar.

Note: Comments below reflect Bill de Alva's thoughts and opinions from years "in the trenches" managing trail grooming for TNA and have not been endorsed by TNA's board of directors.

TNA has seen steady growth in Nordic trial use at both the Priest and Trout Lake trail systems and the USFS approved significant expansion of groomed trails at Priest Lake in recent years. However, there is still unmet demand for dog-free and fat bike trails. The Priest trail system is now pretty much maxed out with little or no options for further expansion. The USFS constructed a new winter-use parking lot at the Priest – Matterhorn trailhead in 2015. The expanded parking was long overdue and a huge improvement for Nordic and back country skiers.

Process:

We understand that the Forest Plan revision is not intended for approval of specific activities in specific locations. The Forest Plan revision is intended to set management policies that will guide USFS staff and District Rangers when considering requests and applications for specific uses. Having worked with Norwood District staff for almost two decades I have some suggestions regarding process that may be appropriate for consideration with the Forest Plan Update.

TNA has over the years requested a number of changes to our permit for grooming of Nordic trails. USFS has been able to accommodate some but not all requests. District staff has always been supportive of TNA's overall mission but often USFS staff is not able to provide a clear process for consideration and (hopeful) approval of specific requests.

A number of long standing issues related to TNA's special use permit for grooming trails at Priest and Trout Lake have no clear path forward. Two issues in particular deserve attention; (1) prohibiting dogs (and other conflicting uses) on specific groomed trails and (2) whether any option exists for seasonal rental of USFS facilities (buildings). Every time TNA has made inquiry

regarding these concerns we have been advised the only available avenue would be to apply for a ski area permit.

Based on information received to date, changing to a ski area permit is not a practical option for TNA at this time. The overhead associated with the additional requirements imposed for a ski area permit would not be sustainable based on current or projected numbers of users. TNA would also lose existing government support for trail grooming if we were to implement mandatory trail use fees.

Beginning in 2015, the USFS has offered the [Matterhorn Cabin](#) for nightly rentals. Prior to that year, TNA was allowed use of the heated garage adjacent to the cabin as a base for grooming equipment. TNA has inquired whether it would be possible for TNA to rent the Matterhorn facilities for the entire winter season. We believe TNA could increase net rental revenue to the USFS while simultaneously benefitting and enhancing the experience for all winter trail users. The irony of this issue is the demand for winter guest rental of the Matterhorn cabin is almost entirely dependent on the quality and consistency of TNA's trail grooming.

It would be very useful knowing whether any aspect of the Forest Plan revision might clarify or make possible options for management of winter trails uses (designated dog, fat bike and skier only trails for example) and setting priorities for use of USFS facilities (rental of the Matterhorn facilities) by any means other than a ski area permit. TNA is aware that other Nordic areas operating in the GMUG Forest have similar concerns.

Other Winter Use Issues:

Winter motorized use has increased significantly at Lizard Head Pass in the last ten years. The boundary between the GMUG and San Juan National Forests runs (more or less) north-south at the top of the pass. Motorized use is allowed in the San Juan Forest at Lizard Head Pass but is not allowed on the GMUG side of the pass, except on the historic RR Grade. The RR Grade also comprises the majority of the approved trail for groomed Nordic use so there is an inherent potential for conflicting winter uses on the RR Grade. Lack of adequate boundary signage leads to many snowmobilers crossing onto the GMUG forest. Mitigation of conflicting uses was a motivating factor for TNA in requesting expanded trails at Trout Lake.

The USFS approved temporary grooming of additional trails at Trout Lake in 2015. The additional trails groomed on a trial basis represented roughly half of the additional trails TNA had proposed. The added trails proved extremely popular with Nordic skiers as they offered a huge improvement in terrain variety, access to scenic vistas and isolation from motorized uses allowed on the historic railroad grade. Unfortunately, the USFS denied approval for continued grooming of the additional trails after the trial period, citing concerns with inadequate parking and impacts to lynx habitat as reasons for the denial.

Better enforcement of motorized uses in prohibited areas would easily offset the increase in compacted snow resulting from expanding groomed trails. That, combined with current science¹ regarding possible impact of compacted snow on lynx habitat should all but eliminate impacts to lynx habitat as a reason to deny expansion of groomed trails at Trout Lake.

Lack of adequate parking for Trout Lake Nordic trails is a significant (existing) problem and safety issue. TNA proposed an expansion of the lower trailhead parking area in 2015. Objections from some Trout Lake residents to possible increases in traffic on Trout Lake Road led to USFS denial of expanded parking. TNA encourages users to park at the top of the pass

¹ 2008 USDA Southern Rockies Lynx Management Direction Record of Decision P-14; "Current research indicates that prohibiting snow-compacting activities or reducing dispersed recreation use would be unwarranted."

but it is not uncommon for both parking areas to be maxed out on weekends – especially early season when Trout Lake is often the only Nordic skiing available in southwestern Colorado.

The speed limit at the top of Lizard Head pass is 55 mph with limited sight-distance at the parking pull-out. Currently, parking is limited to widened areas on both sides of the highway at the top of the pass that will accommodate roughly 18 vehicles (when the widened areas are fully plowed). On busy weekends and holidays, cars will frequently be parked in the snowplow turnaround or (worse) encroaching the edges of the travel lanes. Visibility for passing drivers can be hampered by vehicles pulling in or out of parking which, combined with skiers crossing the highway can be extremely dangerous ([VIDEO LINK](#)).

There is an existing paved parking lot on the north side of the pass (opposite side of the hwy from the groomed trails). The USFS asked CDOT to not plow the paved parking lot several years ago due to problems with vandalism and snow plow damage to curbs. There is also a graded unpaved area on the south side of the highway immediately adjacent to the top of the groomed trail. Winter plowing of the unpaved area would be challenging (but not impossible) due to exposure to wind-blown snow.

Possible strategies for improving parking and safety along with expanded trails:

- Work with CDOT to reduce the speed limit and install flashing “Pedestrian Crossing” signs.
- Work with Trout Lake Property Owners and the County on expanded parking at the lower trailhead. Some Trout Lake residents have expressed they would be ok with expanded parking at the end of Trout Lake Road if expanded parking at the pass occurred first and/or if there was a corresponding commitment from the county for increased road maintenance (for pothole mitigation).
- Work with San Juan Dolores Ranger District and TNA for approvals, funding and implementation of parking improvements on the south side of the pass. TNA has stated its commitment to find a way to pay for improvements.
- Possible Collaboration between GMUG Norwood District and San Juan Dolores Ranger District for approval of groomed trails on the west side of Lizard Head Pass that would connect to the Cross Mountain trailhead. Many winter trail users come from points west and south (Rico, Dolores, Durango, Cortez, etc.). Providing parking and groomed trails that connect from the Cross Mountain trailhead would simultaneously expand parking and provide greater variety of groomed trails. Challenges to that scenario include separation from snowmobiles and difficulty in keeping trails groomed at the top of the pass.