



March 18, 2024

Norwood Ranger District  
U.S. Forest Service

These comments are being submitted by the Great Old Broads for Wilderness (Broads), Northern San Juan Chapter. Broads is a local chapter of a national non-profit with over 8500 supporters across the country and 40 local chapters. Our chapter operates in Delta, Montrose, Ouray, and San Juan Counties. Our mission is to protect public lands and waters with an emphasis on preserving habitats for wildlife, sensitive species and potential refugia in the face of climate change. Our members are hikers, mountain bikers, wildlife watchers, and conservationists.

Thank you for the opportunity to provide comments on the Telluride Mountain Club trails proposal.

Broads have the following **General Comments**.

It is difficult to evaluate the proposal when the only background documents are from 2019. At that time the Trail Sustainability Plan estimated over 200 miles of non-motorized trails, with a concept of 51 additional miles of trails. There is no current information on the miles of trails existing, including private ski area trails and other transportation options such as gondola transport. The Forest Service should provide, or require the trail group to provide, a current comprehensive trails inventory that can be fully reviewed. The GMUG recently completed a Final Land Management Plan that identified Recreation Opportunity Spectrum (ROS) settings and Management Areas with trail density requirements. How does the trails proposal fit within ROS(s) and other Management Areas? Does the proposal fit within the trail density requirements?

The necessary trails inventory needs to include all current and proposed trails, including the existence of social trails or user-created trails. These trails are not designed by professional trail designers to specification for erosion control, wildlife habitat, steepness and turning radii, or safety issues. The Forest Service should evaluate all social trails, and close and rehabilitate the social trails.

Broads strongly support the use of the NEPA process to evaluate trails development. One of the tenets of NEPA is to present alternatives, including full review of a "No-Action" alternative. The Forest Service must also be responsible for vetting the contractor(s) providing any NEPA analysis.

The proposal does not clarify for all trails which will be designed for hiking or mountain biking, and information on equestrian trail design is lacking. Broads remain concerned that trails are labeled as multiuse when there are often not adequate provisions to make them truly friendly for all users. The document *Guidelines for a Quality Trail Experience* has a nice list of Trail User Objectives. Hikers, bird watchers and equestrians may focus on the

values of nature, solitude, escape, socializing and safety/security (including on-trail security). Mountain bikers may focus more on risk, challenge, variety (surface, grade), and playfulness. Trail design to accommodate all those objectives is difficult. The above referenced document goes on to explain Preferred Use, “While preferred-use trails allow two or more user types to access a trail, they are designed to primarily accommodate the experience of only one of the users. Used as a management tool, preferred-use can combine the benefits of both multi use and single-use trails, but due to user reference of the design elements they may become de facto single-use trails.” (BLM and International Mountain Bicycling Association. 2017. Guidelines for a Quality Trail Experience. <https://www.imba.com/resource/guidelines-quality-trail-experience-ggte>)

A major flaw in the proposal is the lack of planning for the needs of wildlife and habitat protection. There are a couple of statements in the proposal about wildlife, but there is no evidence that the trail plans actually considered wildlife in the planning and siting. There is no mention in the proposal that mapping websites such as CODEX or CPW’s High Priority Habitats and Species Activity Mapping were consulted, or that CPW was consulted on trail siting. The CPW sponsored *Guide to Designing Trails with Wildlife in Mind (Wildlife Guide)* is a good place to start. The Guide defines the mitigation hierarchy for trail design as Avoid, Minimize and Mitigate for wildlife concerns.

As part of trail planning, the Forest Service needs to develop education about trails and the impacts on wildlife. The results of the 2021-2022 Telluride Regional Trails Survey that 66% of those surveyed reported “trails do not negatively impact wildlife” do not obviate the reality of trail impacts on non-human populations and habitat. Certainly this indicates that public and recreation user education is needed before more trails are planned and constructed. The *Wildlife Guide* provides background on that topic and how to design trails with wildlife in mind.

Most funding sources, such as CPW Non-motorized Trail Grants, require applicants to address issues such as “how potential impacts to wildlife and natural resources were evaluated during the project scoping phase using ‘Planning Trails with Wildlife in Mind’, mapping tools, etc.” The CPW Southwest Region Office review of the 2024 applicants for trail grants provided the following statements:

([cpw.state.co.us/aboutus/Pages/TrailsGrantsNM.aspx](http://cpw.state.co.us/aboutus/Pages/TrailsGrantsNM.aspx))

- “Outdoor recreation associated with trails influences a variety of wildlife species in multiple ways. Impacts to wildlife from trail use are often negative and are associated with increased direct disturbance and displacement from optimal habitat due to the avoidance of human activities.
- Elk and deer increase their daily activity levels and movements in the presence of mountain biking and hiking... This increased energy demand occurs simultaneously with decreased forage intake and displacement to areas with poorer quality forage. ...Higher energy demand effectively decreases the carrying capacity of an area and increases stress on individual animals.
- Many wildlife species also avoid areas of human disturbance completely, which decreases the amount of available habitat.
- Elk and deer generally do not become habituated to hiking or mountain biking.”

The GMUG Final Plan has as a Desired Condition: **FW-DC-REC-02:** Recreation is managed to achieve a sustainable balance with other resources, uses, and management activities (e.g., wildlife habitat; vegetation management; rangeland management). Impacts to the social and biophysical environments from recreational use are limited, monitored, and well-managed, and recreationists consistently enjoy positive visitor experiences.

**Comments on Specific Trails.****Mountain Village to Valley Floor single track Connector**

It is our understanding that this is an important wildlife area and that adding a second trail would further fragment the wildlife habitat. Broads would recommend only one trail in this location.

**Ilium Flume trail**

We understand that the strip of FS land proposed for this trail is an important area for wildlife. Broads asks that the Forest Service consult with CPW on the impact of this area for wildlife and to avoid developing a recreation trail in this location.

**Sheep Mountain Traverse**

The Sheep Mountain Special Management Area should be defined by the range and connectivity needs of wildlife. It is not appropriate to use trail design features as the boundaries. It is our understanding that additional trails in this area would negatively impact wildlife migration and connectivity.

**Sunshine Mesa Backcountry Trail Loop Rehabilitation**

Broads are concerned that continued maintenance will be needed on these trails because of the steep terrain and potential mountain bike and e-bike use on unsustainable trails. Broads recommends that the Forest Service use the NEPA process to evaluate the design and sustainability of trails in this area. Another area of concern is to ensure that the Morningstar trail is not utilized for bicycle and e-bike access to the Lizard Head wilderness.

**South Side Perimeter trail – Town Park to Bridal Veil Falls trail**

Broads would support a perimeter trail in the busy, town area. We appreciate that the trail design considered the steep terrain and restricting use to hiking only.

Thank you for your attention to these comments on behalf of Great Old Broads for Wilderness-Northern San Juan Chapter.

Sincerely,

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