July 12, 2019

From: Interested Citizen

To: Mr. Derek Padilla, District Ranger and Mr. Tom Rice, Recreation Staff

USFS, Dolores Ranger District

29211 US Highway 184

Dolores, Colorado 81323

Subject: Chicken Creek Trails Project Draft Environmental Assessment

Dear Mr. Padilla, Mr. Rice, and EA Team Members:

I am writing in response to requests for input and comment regarding the proposed Chicken Creek Trails Project Draft Environmental Assessment. I have been a member of the Chicken Creek Nordic Club since 2001 and am currently on the board of directors. In addition to Nordic skiing and trail grooming at Chicken Creek, I spend time in the area hiking, biking, hunting, and horseback riding.

For winter snowshoeing, a designated trail beginning at the Chicken Creek Trailhead parking lot heading west around Stump Lake that would follow the berm along the south side of the lake and circle to the north side of the lake back to the parking lot is recommended. This trail could follow existing old roads. This trail should be designated as a snowshoeing, winter hiking, winter jogging, and dog use trail although skiing could be allowed but probably will not be groomed by the Nordic club. This snowshoeing trail could also connect to the Joe Moore state land off to the northwest. This snowshoeing trail would keep snowshoers off of the Nordic trails that we work so hard to keep in shape for skiers.

A forest closure order is needed to keep joggers, hikers, snowmobiles, and snowshoers off of the Nordic ski loops when trails are groomed for Nordic skiing. The forest closure order should also prohibit dogs on the Upper Nordic Loops. Perhaps the order could be modelled on the forest closure order already in existence for the Vallecito Nordic Ski Area.

Building the Outer Loop Trail is both unnecessary and a detriment to wildlife, especially the proposed segment northwest of Hallar Reservoir. Lost Canyon and the smaller side canyons feeding into it provide excellent hiding cover for a variety of wildlife and a respite from the increasing recreation in the area. Lost Canyon could be classified as a security area according to the definition of a security area found in the draft EA. Keeping trails at least ¼ to ½ mile away from the rim of Lost Canyon is recommended. With all of the roads already in the area, is new trail construction really necessary? New construction of the Outer Loop segment from the proposed Stump Lake Trail to the 559 Road may really be all that is needed. Use the 559C, 559D, 559E and other existing road segments as part of the Outer Loop trail system, eliminate miles of new construction, and obliterate social trails. Can the Forest Service really afford to be building more trails to the system when maintenance of existing trails is already an issue?

Goshawks do forage across the area. Converting the understory to oak brush will be a detriment. There is at least one active goshawk nest in Chicken Creek. Lost Canyon provides excellent nesting potential.

Until recently, timber sales throughout the area were not coordinated with the Nordic Ski Club. Ski trail segments were day-lighted causing rapid snow melt along with rutting and slash on some of the trails. Coordination has improved recently and it is hoped that the ski club will be involved in the planning process for future timber sales in the area. Past timber sales have left visual eyesores along many of the trails including the Dolph Kuss and Hamlin Trails. Eyesores include; partially burned piles with noxious weeds, landings not completely hauled off, slash, and damaged trees untreated with no follow up and slashing of poor quality understory trees. USFS recreation, fire, and timber specialists need to do a better job of coordinating post-sale treatments to insure visual quality along all of the trails in the area.

As presented to the Nordic Ski Club, the primary objective of the recent timber sales implemented in the area was wildfire risk mitigation. Without timely follow-up prescribed fire treatments of the oak brush after a timber sale, this objective is not being accomplished. Many of the oak stands under the ponderosa pine that were previously harvested are now eight to ten foot tall with dense, continuous fuels. Additional funds will have to be spent to masticate the heavier brush fields because broadcast prescribed burning was not completed promptly after timber harvesting was complete. With an expected increase in recreation and a higher likelihood of human caused ignitions, this conversion to a brush understory is not accomplishing wildfire risk mitigation. Timber sales need to be followed up promptly with broadcast burning to set back the oak and open up the forest floor to grasses and forbs along with frequent maintenance prescribed burning.

Thank you for the opportunity to comment.

Sincerely,

Cc: Colorado Parks and Wildlife, Durango Field Office