



Dolores River Boating Advocates

www.doloresriverboating.org

PO Box 1173

Dolores, CO 81323

970-799-8704

info@doloresriverboating.org

Dolores River Boating Advocates promotes responsible recreational use and balanced flow management of the Dolores River, while working to protect the watershed for the health of the natural environment and the livelihood of future generations.

October 8, 2019

San Juan National Forest – Dolores Ranger District

Attention: Tom Rice

29211 Highway 184

Dolores, CO 81323

Re: Sage Hen Motorized Trail Proposal

Dear Mr. Rice,

Please accept these comments regarding the Sage Hen Motorized Trail Proposal on behalf of Dolores River Boating Advocates (DRBA). DRBA is a local non-profit organization focused on the Dolores River from both recreational and ecological perspectives. I am also an appointed member of the Montezuma County Recreation Advisory Committee (MCRAC).

We understand that the proposal would designate 4.75 miles of motorized trail within the Sage Hen/McPhee area through land that was acquired for wildlife habitat mitigation when McPhee Reservoir was built. It is our understanding that this continues to be a very important area for wildlife habitat, especially for big game, and that the area is currently used for non-motorized recreation including hiking, mountain biking, and horseback riding. We also understand that the area is home to a high density of cultural resources. Considering these conflicts and the special management requirements that would be necessary, we do not see a strong enough case to create a motorized trail in the Sage Hen area.

DRBA does not support the Sage Hen Motorized Trail Proposal and our specific concerns are outlined below. First, I would like to make a clarification regarding the MCRAC's participation in this proposal. While the MCRAC has participated in two meetings regarding

this project with the Forest Service, the committee itself was not the proponent pushing the project forward and the group has never been asked to take a formal position on the proposal. The scoping notice mentioned that the county requested that this project be considered *in partnership* with the MCRAC, but that is incorrect. The committee made no such request and there is not consensus among members of the MCRAC in support of this proposal.

Cultural Resources: The density of cultural resources found in the Sage Hen area make it an impractical place to put a motorized trail. Our understanding is that the only way to ensure that there would not be significant impacts to the cultural resources is to fence the entire length of the proposed motorized route. This seems cost prohibitive and in conflict with wildlife habitat management. The cultural resource analysis needs to include the impacts from the route itself, as well as the short-term and long-term cost of installation and maintenance of a fence.

Wildlife Habitat: The Sage Hen area was acquired by the Bureau of Reclamation and transferred to the US Forest Service as mitigation for wildlife habitat when McPhee Reservoir was constructed. The impacts from the reservoir were significant and mitigations for that project must be honored. We appreciate that there would be a seasonal closure for wildlife, but we are concerned that is not enough. Wildlife habitat should continue to be the focus of management. Impacts to wildlife should be thoroughly analyzed as part of this proposal. We feel that these questions need to be answered in the analysis: How would the fencing required for cultural resource management impact wildlife? Would fencing have to be removed or laid down during wildlife closures? What other ways would a motorized trail impact wildlife? What is the cost of installing and maintaining fencing? How would this be paid for?

Impacts to Other Established Users:

- **Dolores River Recreation Below McPhee:** Boaters increasingly use the stretch of the Dolores River between the base of McPhee Reservoir and Bradfield Bridge when there are releases from McPhee, especially in smaller craft at lower water levels. It is a family friendly and accessible day trip that does not require a great deal of driving. As climate change and drought impact southwest Colorado more and more, we may see an increasing number of smaller managed releases from McPhee in years to come. We anticipate that the recreational use of this stretch of the river will increase over time. This stretch of river is also utilized for camping and fishing. Increased motorized use along the river could impact these uses. We understand that the interest in this proposal is partially motivated by a desire to positively impact economics in Montezuma County. While we support diversification of economic inputs in the county, we feel that these other established uses need to be considered as part of that effort as well. Please include an analysis of the impacts that this trail would have on other recreation uses on and along the Dolores River below McPhee Reservoir.

- **Non-motorized Use Within The Sage Hen Area:** Since the Sage Hen area is currently managed for non-motorized recreation including hiking, mountain biking, and horseback riding, the analysis should look at how the proposed motorized trail will impact those users. Many local residents frequently use this area for non-motorized recreation and appreciate the lack of a motorized component.

Cumulative Impacts: If approved, the Sage Hen Motorized Trail would depend on FS, BLM, and county roads to connect to the Rim Rocker Trail. The cumulative impacts that this project would create need to be considered. Please include an analysis of these potential routes and what the impacts would be to them. Are other counties in support of having an increase of motorized use on County roads?

Purpose And Need: We do not feel that the purpose and need for this proposal is identified clearly enough. We would like to see an analysis of existing routes that could provide a connection to the Rim Rocker Trail. There are already hundreds of miles of roads and trails on the San Juan National Forest and it would be better to utilize routes that would not include putting a motorized trail through sensitive wildlife habitat and a high density of cultural resources. Please also provide an assessment of need for administrative access. Our understanding is that administrative access was granted when the McPhee Project was approved. Why is additional access needed so many years later?

Thank for the opportunity to provide scoping comments on the Sage Hen Motorized Trail Proposal.

Sincerely,
Amber Clark



Executive Director
amber@doloresriverboating.org