



To whom it may concern,

Please accept these comments regarding the proposed Salter Vegetation Management Project. Overall, it appears a lot of thought and research was put into the Salter EA. SWCCA understands the need to minimize wildfire risk, beetle kill and improve forest health. Here are some key areas of concern.

- **TEMPORARY TRAIL CLOSURES** - This project will result in temporary trail closures which will hurt local businesses, anger users and deter visitors. To “ease the pain” of these closures, mitigate frustrations and minimize the negative economic impact here are solutions:
 - **NO-WORK, NO TRAIL CLOSURE** - Lifting closures any time there will be more than a two-week no-work gap in operations.
 - **TRAIL DETOURS** - Utilizing existing, numerous roads as trail detour routes instead of a complete trail closure. SWCCA volunteers are willing to assist with the trail detour routing and the placement of temporary guidance signage.
 - **NO-DANGER, NO TRAIL CLOSURE** - Only close the trail section when there are dangerous operations within a defined buffer around the trail. SWCCA volunteers are willing to assist posting “Danger, stay on trail...” signs and assist in marking buffer area.
 - **ROAD/SKID CROSSINGS** - Trail skid crossings should be treated like a road crossing with appropriate signage and not a trail closure. If there is resistance to a safety need for logging truck speed limits on FS 527 why would it be any different for crossing a skid road.
 - **ONE TRAIL CLOSED AT A TIME** - Recreation treatment blocks limited to treatment one at a time should include all blocks in the Boggy Trail System 1-5. Also, it is important to consider that trails like Boggy Draw and Mavericks are a primary artery to outlying trails. Closing these makes access to other trails difficult requiring navigating logging vehicles on roads and other project hazards.

- **DAMAGE TO TRAIL TREAD** - Singletrack tread quality, scenery and trail flow is critically important to most Boggy Draw trail users.
 - **REROUTE TRAILS OFF HAUL ROADS** - While the EA calls for returning any trails damaged by timber management operations to pre operations conditions, a significant impact would be on the sections of existing trails that happen to be on Level 1 roads (closed roads that are in storage and can be reopened for projects). The EA allows for some of these roads to be kept open for slash treatments, and possibly reopened and rebuilt for future logging operations. This will obviously destroy the singletrack tread and reduce the value of the trail and user experience. Efforts to rehab the haul roads back to singletrack trails could be delayed for months/years because of the various project steps requiring road access, like cutting then later dealing with slash piles. The best solution would be to reroute all non-motorized trail sections off the Level 1 roads prior to the logging operations.

- **REROUTE HAUL ROADS OFF TRAILS** – Another component would be permanently removing the Level 1 status from appropriate already closed road sections overlapping the trail and rerouting haul roads off of trails. There are haul routes that obviously look like old closed roads but there are other sections where there is no sign that the trail was ever a road. Specifically, there is a section of the Boggy Draw trail where a haul road could be constructed on top of what we consider pristine trail. This section is directly south of the FS 527 and FS 527.H intersection. Rerouting this haul route to 527.H seems logical, shortening the haul distance.
- **USE TRAIL AS SUBUNIT PERIMETER WITH BUFFER** - When units are broken down further into subunits for contractors there should be an effort made to use trails as perimeters which also helps with adding a buffer around trails that is easier for contractors to avoid. This also avoids unnecessary trail crossings. However, both sides of trail should have consistent treatment and/or a natural looking blend/transition. This will also reduce marking and management work by having a perimeter only and not an additional corridor to avoid in the middle of a subunit. An effort should be made to not split subunits between numerous contractors along a stretch of trail avoiding sporadic closures because of varying work schedules.
- **TRAIL REHABILITATION AGGRESSIVE AND IMMEDIATE** - Rehabilitation of areas disturbed by logging operations should be particularly vigorous within the proximity of trails to maximize visual esthetics immediately after timber operations of that area in the subunit are completed. This could include removing slash immediately and locating slash piles out of view or at least 100 feet from trails, since even after they are burned there would still be visible fire rings. The EA calls for establishing a visual corridor on each system trail. It states that, “The area of influence is 9 feet of center line...”. It does not seem clear what this means, and 9 feet to either side of the trail centerline seems awfully narrow. Within this area stumps should be cut flush with ground. The 15’ for vehicle tracks is very narrow as well and will leave visible marks easily viewed taking away from the natural experience users are looking for.
- **PRE AND POST CONTRACT WORK OVERSITE INVOLVING RECREATION STAKEHOLDERS** - We have heard that in another similar project there was not enough oversight to ensure EA requirements were adhered to. Penalties and pre- and post-inspections would help prevent this before it is too late. Trail stakeholders should be able to inspect periodically along with FS recreation personnel. Also, some of the required design features are vague. Current Dolores District staff seem to have a good understanding of SWCCA perspectives of these items, but future staff may not be as congruent.
- **CAMPING AND VISIBILITY CONSIDERATIONS** - The Boggy Draw area is popular for dispersed camping. Each year campers are seen in locations not previously used for camping. As the density of trees is reduced, there may be increased dispersion of campers to previously inaccessible or less accessible locations. This may also degrade from the user experience because campsites can be spotted from longer distances removing the secluded feel when on the trail.
- **WINTER RECREATION CAN BE IMPROVED AND USER CONFLICT AVOIDED** - Removing trees along winter recreation routes could impact snow levels and negatively affect grooming efforts. However, there may be an opportunity to create alternate/new groomed winter recreational routes. Grooming operations are now on and south of FS 527, but the snow can be better on the north side. More southerly routes already have softer conditions which could be compounded without the canopy. If FS 527 or other currently groomed road haul routes are plowed during grooming season, then rerouting groomed sections off roads

permanently would be a solution and potentially a long-term improvement. SWCCA has previously requested alternate routes to groom avoiding FS 527 and FS 259 to mitigate conflict with some traditional user groups that damage the groomed surface. Snow bike grooming is less than 4' wide so a tighter route between vegetation can be used maintaining snow levels and providing users a more desirable experience. We urge the Forest Service to consider these alternate routes.

- **VALUE OF TRAIL CONSTRUCTION & MAINTENANCE CONSIDERATIONS** - Expensive SWCCA volunteer and FS efforts are impacted by the project.
 - **REROUTE FUNDING FROM PROCEEDS** - The trail realignment should be funded by proceeds from the project and not volunteers. Volunteers (unpaid) already contributed significant effort and should not be tasked with more uncompensated work as a result of this “for profit” project.
 - **SWCCA CONTRIBUTION VALUE** - SWCCA recently constructed 24.4 miles of trails in the Boggy Draw system with a market value of \$447,496.00 (Calculations use the published average rate of \$3 per foot and \$2500 per mile design and layout). This is just the recent expansion and does not include the other previously constructed trails in the network and significant maintenance and improvement efforts. The list of sources for costing is extensive, SWCCA can provide them upon request, or many can be viewed doing an internet search.
 - **FS CONTRIBUTION VALUE** - As stated in the EA, some \$300,000 worth of FS trail construction has been invested in producing the current (motorized and non-motorized) trail system.
 - **ADDED TRAIL WORK** - Past experience shows that as the ponderosa canopy is reduced, Gambel Oak seem to quickly fill in the newly opened areas. This would seem to interfere with the goal of promoting new Ponderosa growth. Plans to control such oak growth should be defined. Examples are areas on the northeast mesa above horse camp site and northeast mesa point above house creek and bean canyon intersection where there is evidence of historic logging but very limited new growth except thick oak brush. Additional Gambel Oak also creates more trail maintenance. Even past mitigation efforts have short term success and fill back in with oak brush quickly and vigorously. For example, look at the mesa northwest above Italian canyon and the Dolores river canyon intersection. Coincidentally, historic photographs of Boggy Draw that are available in books like “The RGS Story Rio Grande Southern” show far less Gamble Oak.

- **ECONOMIC AND COMMUNITY IMPACT**
 - **ECONOMIC LOSS** - There is not adequate language in the EA addressing the negative economic impacts due to the temporary loss of recreational opportunities. This could be reduced by tight scheduling of trail closures and limiting the number of trails closed at any given time. The above requests require more attention and management of and by contractors. While there are economic benefits from the logging operation that are easy to quantify, some of the more significant economic impacts from recreation require a deeper analysis, tracking dollars through numerous hands. Residents opposed to recreation or indifferent about trail impacts may be surprised how they unknowingly benefit. There are abundant statistics and studies available on the internet. For example, mountain biking economic impact output in a Grand Junction study = \$7,284,528, Crested Butte study =

\$10,848,408 and 237 jobs supported, not including other trail activities.

https://www.imba.com/sites/default/files/content/resources/2018-11/OA_GMUGNF_MtnBikingStudy2018.pdf

- **TALENT RECRUITMENT** - Community impact includes recreational opportunities that help recruit talent for otherwise hard to fill positions like medical professionals benefitting everyone in the community. Not just trail users.
 - **COMMUNITY HEALTH** - Another benefit from a great local trail system that is difficult to quantify is how it provides a place to improve community members' mind and body health. Trails provide a release from the stresses of life and a place to improve fitness.
- **SAFETY**
 - **SAFER ROUTE OFF CR 31 HAUL ROUTE** - Although outside the scope of the EA, the proposed non-motorized trail from the town of Dolores to the Bean Canyon trail becomes more critical when considering the EA's Modified Proposed Action. The proposed trail generally parallels Road 31, providing a safer alternative for trail users versus the heavily trafficked road. Road 31 will be the haul route for the logging trucks in the proposed project. Providing a trail alternative to the road is safer for the trail users and the logging trucks and should be a top priority. A portion of the proposed trail includes a short new section of trail on Forest Service land between the boundary and Bean Canyon Trail and requires FS approval. We urge them to consider rapid approval.
 - **SPEED LIMITS** - Speed limits and slow down signage should be posted and enforced for logging trucks at trail crossings, shared trail routes and parking areas.

Sincerely,

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