



December 30, 2022

Hello Derek,

Please accept the following comments from Southwest Colorado Cycling Association (SWCCA) on the Boggy Draw Recreation Access and Infrastructure Improvement Project.

SWCCA supports the Proposed Action and respectfully submits the following:

SWCCA worked closely with the SJNF to mitigate trail impacts that would result from implementation of the approved Salter Vegetation Management Project. Multiple sections of the Boggy Draw trail system are located on historic logging routes that will be reopened and used by logging equipment. This would cause trail access closures and destroy the singletrack characteristics of these trail sections. The reroutes were carefully chosen to avoid logging operations, meet Forest Service requirements and where possible, create an improved route.

SWCCA requests that implementation (construction) of the proposed reroutes in the Boggy Draw area be allowed to proceed as soon as possible, following the Final Decision of the Proposed Action and prior to the start of any logging operations in the Boggy area. SWCCA is committed to the construction of all reroutes and to the decommissioning (closing) of the old routes or route access points using the same or similar methods and equipment that we used to construct the trails in the Boggy Draw Expansion. A 2023 implementation would allow SWCCA to maximize our limited resources. Additionally, completed reroutes will help promote positive public/user relations and outreach once logging operations begin. The reroutes were carefully chosen to avoid logging activities and the majority of the reroutes will be an improvement over the existing routes by improving design and flow, maximizing the terrain and sustainability, and/or diverting off a decommissioned (future) logging road. This should render the use of old routes as undesirable and continued use of the old routes should be absent or miniscule but can be further avoided by aggressively closing access between the old and new route.

The proposed route for the west end of the Shush Bekeeh trail was requested prior to construction of Shush Bekeeh but was delayed. Multiple control points were identified early on, and this route provides the access, elevating user experience and avoiding logging operations.

The proposed Town trail section is the last section of trail linking the Town of Dolores to the Boggy Draw trail system and is critical for the existing trail to be a true link to Boggy. The existing trail starts in Dolores at the north end of 14th Street and stops at Road W. To access a Boggy Draw trail, users then travel on Road W or Road 31. If the Proposed Action is approved, the town trail would continue paralleling Road 31 in the county ROW, then onto the proposed Town trail connection to Little Bean Canyon trail. The existing trail from Dolores was a massive undertaking by SWCCA. SWCCA volunteers coordinated permanent easements between six landowners and the Town of Dolores or Montezuma County, constructed the entire trail up the steep hillside, overcome multiple challenges to create a sustainable trail, hauled out massive amounts of trash, maintained extensive outreach and community support, and funded and installed signage and fence infrastructure required by landowners and road



crossings. By providing a more desirable trail experience the town trail is intended to reduce mountain bike and pedestrian traffic on Road 31, create a loop when combined with the existing McPhee Overlook trail on the west end of town, and provide more centralized trail access adjacent to the community.

Regarding the trailheads and infrastructure, please consider keeping the parking areas as natural as possible by leaving trees and some shrubbery clusters and avoid large rectangle parking areas. When SWCCA made the parking lot on the trust land at Phil's World the rectangle seemed to be the easiest and most cost effective, but we have found that users typically do not park in a way that maximizes the space. An option could be a vehicle loop route with parking to the sides that is wide enough for snow plowing, meanders through the natural terrain, provides organization and maintains the nature experience. Please include us in discussions where we could provide input.

In the past, there have been significant requirements added to a decision that were absent from a proposed action and draft decision. SWCCA requests a meeting to discuss any significant changes or additions to the proposed action and/or draft decision, prior to a published final decision.

Thank you for the opportunity to comment on the Proposed Action.

Respectfully,

SWCCA