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Comments: Please enter the enclosed attachment in the Salter EA record.

The priority of use of Boggy Draw and its importance to the community needs a significant reprioritization here. My enclosed letter speaks to that.

Cap Allen

Ref: Comments on Salter EA.

I have reviewed the Salter EA. Although forest management policies from the time of Gifford Pinchot have often proved themselves steered in inappropriate directions, I must assume in this case that the science is good and that this form of forest management is the right pathway- for those portions of forest you intend to act upon. I am not well enough informed to comment otherwise.

However, the Forest is a multiple use entity. When one of those multiple uses becomes far more important to a community it needs to be recognized. Not --all uses --all of the time --in all places-- in the forest are promoted or allowed, There are areas where some of the multiple uses are restricted because other uses have become more important in that area. i.e. I have not seen a lot of clear cutting adjacent to ski area slopes, one doesn't see USFS campgrounds get logged.

The Boggy Draw area appears to be about 40% of the area considered for management in this document. The USFS has gone to a lot of trouble in Boggy Draw in recent years working directly with the volunteer labor pool of the area to define, layout, categorize cultural values, and monitor ongoing trail building in partnership with local recreational users. 1000's of volunteer hours have been contributed. One would think that effort was expended with the idea of promoting a long term value in that trail use. Why else would such coordination effort have been expended by USFS?

Although these trails are multiple use, it is clear at Boggy Draw trail system that mountain bikers outnumber hikers or equestrians by a substantial margin. So forgive me if I call it a mountain biking area. It is important to be realistic.

The Boggy Draw area is not just another grouping of trails in the USFS. These are purpose built trails, built by mountain bikers (with some minor help from the other users) with the presumption that the recreational value of the trail use would be preserved. The visual environment is a BIG part of the recreational value. The Boggy Draw area is known far and wide. This past year we saw travellers from adjacent states and beyond coming to that area to camp and ride. Boggy Draw is an excellent [Idquo]ambassador[rddquo] to SW Colorado for certain groups of recreationalists. My travels throughout the country, camping and bringing along my mountain bike, have discovered no other area with the broad appeal from hard core race enthusiasts to families on a mountain bike for the first time. It is a remarkable and unique area in the wide spectrum of biking users it can accommodate. Just like we protect other forest values, this recreational use should be protected.

Boggy Draw and all of its trail system needs to be considered as a stand alone entity. Not just a casual recreational use that the forest thinning activities need to somehow work around. The Salter Plan has significant potential to damage that entity for a long time to come.

I do not see references to actual dollar values that can be realized from timber sales. I have limited experience in

my profession, as a private civil engineer in Southwest Colorado for 50 years, that tells me timber sales can be a net wash or negative to the USFS when significant funds are expended to promote the sale or clean up afterwards. What can be expected from the commercial aspect of this management plan is one or a very few lumbering operations are able to muster a profit for their owners and some few employees. That operation may or may not be from the area. And it is a short term gain.

What is that number at 40% of the Salter plan when compared to mountain biking?

In contrast the mountain biking community has a daily mounting benefit to which some dollar amounts can be ascribed. EAs and EISs are notorious for using the value of a recreational day, sometimes in very inflated numbers to justify one or another project. But numbers can be placed with some degree of agreement on these activities.

I will use conservative numbers. I have observed on a frequent basis the Boggy Draw mountain bike uses, so I don't think I am far off. Lets say in the course of a weekend day, there are 40 total cars at the various access locations in Boggy Draw, a low total for an entire day. And for weekday 15 vehicles. This gives a user week of 150 vehicles per week. Lets put 1.5 users in each car. This results in 225 user days per week. Surely a low number. Lets call a season (it really never ends as I rode my fat bike on the snow in February) 180 days, 26 weeks. 5,850 user days.

I will say confidently that a person using Boggy Draw one time has a recreational value of \$50 per use. (No, there is no dollar exchange but this is its WORTH). This pales in comparison to the numbers I have seen used in Federal documents. This is about \$300,000 per season and I think that is a low number. Low in terms of overall numbers per year and low in terms of value to the user (consider that \$150 is being spent for ski tickets and similar numbers for a round of golf.)

Multiply this \$300,000 by the number of seasons the "forest management" will continue and further consider the number of years it will take for the forest to regain a "natural" look. X10, x20?

To this you must add the value of mountain biking to the local community. Restaurants are frequented, motels are rented, gasoline is purchased, bicycles are bought, parts are needed. In the extreme I have worked for folks who have come here and purchased a home with the express purpose of having a garage to put mountain bikes in. Each year after the 12 Hours of Mesa Verde bike race, many dozens of riders stay a few days to enjoy Boggy Draw. They continue to spend money in the area. This is not a small impact and it is not slowing down as a draw to this area.

The potential to damage this valuable use of the USFS with a simple logging operation is great. Loggers and bikers are not born friends. A logger will not recognize the impact he has on leaving slash on a trail, parking equipment on same, or even closing off trails. The potential to damage the value Boggy Draw has to the community is great. Temporary closures can lead to long weeks and still be called temporary. Trail damage can be severe. Logging is heavy industry. Heavy industry can be dirty nasty and noisy and polluting and have all those characteristics accepted as "that's the way it is".

To this we must add the value of the finished product. Having just spent a brief winter skiing in the Chicken Creek area North of Mancos I can tell you that the thinned forest does not resemble what was there before at all. Additionally problematic are the seemingly forever piles of slash. I don't know if slash removal becomes part of this effort or if it is slowly burned off or considered part of the new ecosystem. In any case anyone can go to see the result and see that the Chicken Creek area has lost much of its value as a forest experience. In one case a logging operation opened up so much light from above and left so many ugly slash piles that a significant portion of the permitted Chicken Creek Nordic track was rerouted in acknowledgement of the degradation of the recreational experience by the logging activity.

I urge the review team for the Salter EA to execute a complete 180 in their consideration of the forest health project for Boggy Draw. Instead you need to come at it from [ldquo]how can we reduce fire potential, make the forest healthier, reduce beetle kill potential[rdquo] without damaging the Boggy Draw -Primary- trail resource?

That is the right question to ask. The community will thank you for it.

The USFS has an extremely capable resource mapping ability. It would be possible to define quite completely the view shed corridors of the Boggy Draw Trails. A first suggestion is a 200[rsquo] setback of thinning activities from BOTH SIDES of the trails. In some cases it would be larger because it is view shed, distant prospects, that need preservation. A survey of this type is not difficult given modern mapping capabilities. Process that concept and see what you are left with. It is likely you will still have significant acreage to devote to the project and it is likely you can develop a fire break and beetle break concept from doing this. It will be harder to do, but the Boggy Draw uses warrant the effort.

I think the USFS owes the SW Colorado recreation community the consideration of this approach.

Thank you very much