



San Juan National Forest
Dolores Field Office
Dolores, CO 81323-9308

July 23, 2020

Re: REVISED Draft EA -Rico Trails Project 56748

To: Tom Rice

Introduction:

It is a pleasure to be included in the comment process of such projects and appreciate the consideration of the comments provided.

Please accept these comments to the REVISED Draft Environmental Assessment for the Rico Trails Project released June 24th, 2020 (the EA). Please direct any questions or further communications regarding these comments to Heather Hormell at: heather.hormell@gmail.com (970)317-1741.

The comments are submitted by three leading motorized recreation groups who will be significantly impacted by decisions of the Rico Trails Project. These organizations are: San Juan Trail Riders (SJTR), Trails Preservation Alliance (TPA), and Public Access Preservation Association (PAPA) (Collectively the Groups).

- San Juan Trail Riders (SJTR) is a single-track motorized trail user group that has a membership of nearly 400 members within the Four Corners Area, California and Texas. These members provide significant positive economic impacts to a broad range of businesses and communities in cities and towns throughout the region. The organization has for over 30 years provided significant support to agencies like the BLM and USFS for recreational single-track motorized trail construction, maintenance and repair. Additionally, this agency is responsible for helping to establish special grant applications from existing state OHV Funds. SJTR has headquarters in Durango, CO.
- The Trails Preservation Alliance (TPA) is an IRS 501c3 organization and one of the largest single-track motorized recreation support organizations in the State of Colorado. It

annually organizes, directs and supports efforts and activities by smaller clubs and motorcycle recreation groups in Colorado which provide thousands of dollars of revenue to each community in which they recreate. TPA maintains strong communications with both the BLM and USFS to keep abreast of all processes that may impact single-track recreation user groups throughout Colorado. TPA has headquarters in Colorado Springs, CO.

- Public Access Preservation Association (PAPA) is a single-track motorized recreation user group with membership in excess of over 200 members. PAPA has maintained strong relationships across SW Colorado with the BLM and USFS to ensure that single-track motorized recreation opportunities remain available for both local users as well as the many out-of-state single-track motorized users that visit the State of Colorado for holidays and vacations. Their efforts have helped to bring thousands of dollars of revenue to businesses and communities in which opportunities for this type recreation are popular and available.

The Groups take exception that the Agency has made efforts to move forward and expend resources on trails currently involved in the Rico West Dolores (RWD) litigation process.

1. The Groups original comments addressing the sequentially relevant sections of the original EA released in February of 2020 continue to stand. However, with the release of the REVISED EA, we specifically want to address the change of segment of the Stoner Creek Trail between East and West Twin Springs Trails to remain open as currently designated:

The Groups support the consideration to keep the section of trail between East and West Twin Springs on Upper Stoner Creek open to motorized use. We the Groups view this as a positive proposal captured in the REVISED draft EA.

Comment Submissions:

Introduction - Comment

The introduction paragraph (page 4) states that the proposed action of this project is consistent with the 2013 Forest Plan. While The Groups agrees with this we also feel that this project, the RWD Travel Management Plan (TMP), and the Forest Plan fail to recognize, or accommodate, the need for motorized trail users to have a safe, legal way to access the town of Rico for services be it of a normal or emergency need.

With the elimination of legal access to the town of Rico for services, there is significant risk to the town to lose financial benefit of the patronage by motorized users. The elimination of legal/safe ways to access the town of Rico may also promote illegal and unsafe access to the town of Rico. THE GROUPS also see that this situation could potentially make an emergency situation (where access to the town of Rico is the best possible way to react to an emergency)

exponentially worse. This was properly addressed in the first RWD TMP but was refused during the most recent RWD TMP Record of Decision. The rationale given was that there are private property issues on one existing route and that the other route was not consistent with the desire of the Town of Rico to have only limited motorized access to the Town. The Group's members recreate on trails subject to the proposed action in this EA, along the RWD TMP Record of Decision, does nothing to provide any motorized/multi-use access to Rico, even on a limited scale. The Groups feel the Agency should have taken the safety access into consideration and/or given it more weight regardless of comments of some to eliminate motorized (or multi-use) access to Rico for possible nuisance considerations. The 2013 Forest Plan even states that the Rico Regional Plan lists "limited motorized recreation" as a future use (2013 Forest Plan, Appendix W, section 3.6,) yet the Agency has rejected every plan submitted by The Groups to provide even limited access to the town. Sometimes common sense and safety must prevail. By law, these public lands must be managed for multiple uses.

Purpose and Need: Comment

The Groups continue to support the purpose and the need. There is an existing need for motorized connectivity and loop opportunities and the availability of existing trail segments to do so.

Alternatives Development: Comment

Modified Alternatives – Spring Creek modified alternative pg2.

The Groups fully supports the relocation of 3.4 miles of trail and 2.7 of existing single-track motorized trail for creating the new Spring Creek Trail route as a part of the Rico Trails Project EA. This was an identified action of the most recent EIS Record of Decision for the area. These changes help to replace some of the trail miles lost in the most recent Rico West Dolores Record of Decision and makes very important single-track motorized connections between Stoner Mesa, Taylor Mesa and the Calico/Priest Gulch trails.

The Groups disagree with the following aspects of the modified alternatives suggested.

1. “ ..additional alternative to decrease impacts to wildlife would be to remove motorized use from the segment of the Stoner Mesa Trail between East and West Twin Springs trail.”

The Groups vehemently oppose the closing of any portion of the Stoner Mesa Trail to motorized single track users and recommends keeping the trail in it's current multi-user status (thus allowing all users-including motorized). Even closing a small portion of it would cut off the opportunity to access other trails in the system and have a serious negative impact on the motorized users experience of this area as a whole and would not decrease the impacts to wildlife. As stated by the Agency, (pg 16, paragraph 1 of the Rico Trails Draft EA)

“Although non-motorized trails are not considered in the definition of a security area, non-motorized recreation has the potential to displace animals to the same degree as motorized recreation.” This statement indicates that closure to motorized recreation is not the solution in securing game populations and can question previous decisions by the Agency base on motorized recreation potentially displacing animals. Further studies have shown that motorized use has minimal impact on wildlife, specifically big game, as noted in the draft EA, pg. 16, paragraph 1. For example, temporary displacement does not equate to population declines. To fully understand the concern, studies used in this Draft EA should be made available for review. Taking action to close trails to motorized use in efforts of preserving the elk populations appears to be the wrong way to make preservation efforts, while limiting hunting seems to be a more appropriate response.

2. “decommission the southern portion of the lower Stoner Creek Trail (NFSR #625) from the intersection with the proposed Spring Creek trail as well as the segment of the Stoner Mesa Trail (NFSR #625)”.

The Groups do not support the closing/decommissioning of the 1.9 miles of the Stoner Creek Trail as mentioned above. This 1.9 miles of motorized single track trail is valuable to the motorized users experience, has been used historically for decades, and will help off-set some of the lost trail miles that our user group has experienced in the past (RWD TMP Record of Decision), and continually faces at each TMP (which no other user group has experienced in kind or scale). Furthermore, the EA also states “The proposed project area is managed for a variety of uses including grazing and timber. However, the landscape is best known for its recreational appeal.” (Draft EA page 11, P 9) Keeping this section of trail (as a multi-use/motorized system trail) will support that recreational appeal.

The Agency also proposes reduction of trail miles to reduce inventory and maintenance loads. The Agency has historically received, and will continue to receive community support, specifically from These Groups. Such support has been through Volunteer Agreements, grant support and funding, and also via individual motorized users providing tools and labor to help maintain multi-use trails to the benefit of all user groups. The motorized community (The Groups as well as individuals) are best known for its logging out efforts to ensure multi use trails are open for all user groups. Closing recreational opportunities for the stated reason is a failure in keeping and maintaining public lands open and accessible. In addition, closure of Lower Stoner Creek Trail could potentially cause an increase use of other surrounding trails, ultimately causing overuse which will increase trail maintenance efforts.

Furthermore, the Agency will be decommissioning the 6.2 miles at the south end of this trail which we feel serves to meet the Agency goals while preserving the great recreational opportunity (including access to Spring Creek) for all users. It should be noted that any trail designated as motorized can be enjoyed by *ALL* users (multi-use), not just motorized, and

any trail that is designated as non-motorized will actually exclude an entire group of users (even more if you include e-bikes).

Modified Alternatives - Ryman Creek Modified Alternative pg3 - Comment

The Groups question why trails involved in current litigation can be open for comment and proposed action in the EA. Since the Agency has done so we offer the following comments:

The Groups urges the Agency to change the designation back to multi-use (open to all users- including motorized) and support re-routes and improvements to the trail that would protect the resource. Ryman Creek provides essential connector capabilities from the Columbine district to the Dolores district.

The Columbine district has recently provided a connector from the Colorado Trail (between Coral Draw Trail and Divide Road 564 to allow multi-user access between the (2) districts. This demonstrates the importance of this route as a multi-user trail. The 2013 Forest Plan directs the Agency to create consistency between landscapes and returning Ryman Creek Trail to the multi-user designation does this.

The Groups support changing the 2018 TMP designation of Ryman Creek from Non-motorized back to Motorized/Multi-use to include the building of alternative routes, and/or improvements to the trail to preserve the multi-use designation.

Proposed Action – Rio Grande Southern Trail – Comment

The Groups are unable to support the development and designation of the Rio Grande Southern Trail (ROW) as a non-motorized use route only. This route could offer excellent safe trail access for riders utilizing Scotch Creek from the Hermosa Area and riders from the Haycamp Mesa Area who now have only one access route from Rough Canyon Trail to highway 145 into Rico, CO. Our user groups continually ask the agency to refer to the Forest Plan which directs all actions to provide safety and safe access to everyone recreating on the San Juan National Forest and designate this route for multiple-use (including motorized use) designation. Unless the goal of the Rico Trails Project is to ensure that motorized recreation is completely isolated and blocked from access to Rico, CO, then this should be a reasonable request.

Proposed Action – Circle Trail – Comment

The Groups do not object to the incorporating of a non-system trail that has many years of known use into the designated system. Motorized users appreciate that the agency has embraced the concept of incorporating non-system trails with identified long term use into the designated system. This principle and appropriate consideration should be equally applied to requests to incorporate non-system motorized multiple-use trails into the designated system throughout the District also. There should be no differentiation between the speed of which a

non-system non-motorized trail is incorporated into the designated system over how a non-system motorized trail is incorporated into the designated system.

Conclusion:

The Groups appreciate the opportunity to provide comments and urge the Agency to maintain these trails for all users.

Submitted by:

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