

Data Submitted (UTC 11): 3/12/2021 9:49:39 PM

First name: William

Last name: Furse

Organization:

Title:

Comments: I make the following suggestions should the project be undertaken:

oNO-WORK, NO TRAIL CLOSURE - Lifting closures any time there will be more than a two-week no-work gap in operations.

oTRAIL 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.

oNO-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.

oROAD/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.

oONE 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. There are trails like Boggy Draw and Mavericks that are needed to access other trails, closing these makes access to other trails difficult requiring navigating logging vehicles on roads and other project hazards.

oREROUTE 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.

oREROUTE 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 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.

oUSE 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 help with adding a buffer around trail that is easier for contractors to avoid. This also avoids unnecessary trail crossings. However, both sides of trail should have consistent treatment. 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. Also, an effort made to not split subunits between numerous contractors along a stretch of trail avoiding sporadic closures because of varying work schedules.

oTRAIL 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 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.

oPRE AND POST CONTRACT WORK OVERSIGHT 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.

oCAMPING 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.

oWINTER 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' so a tighter route between vegetation can be used maintaining snow levels and providing users a more desirable experience.