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Comments: Southwest Colorado Cycling association recognizes that some of the concerns from our comments were incorporated into the EA, but we object to the draft decision. Here are some of the reasons for filing this objection:

The draft EA was released in the winter; thus, the snow limited the access to inspect the example Chicken Creek project. Over the summer, SWCCA members have been able to see the logging operations at Chicken Creek in more detail, and at various stages in the process. Observations include differences in the quality and level of finish work. Overall, there is a significant loss of scenery and diminished canopy. This greatly reduces available shade, which provides an escape from the heat in the summer, and the ability to maintain a quality groomed surface in the winter. There are large, ugly, uprooted stumps used to form long term barriers. It looks like an industrial mess that will take years, even decades, before looking natural. This diminishment of scenery is not acceptable at Boggy Draw. Boggy Draw is a designated recreation area within 10 minutes of Dolores and is next to, or near, hundreds of residents. Boggy Draw is a prized area, and its designation has driven long-term decisions, volunteers have dedicated thousands of volunteer hours to the area, grants and donors have financially invested in Boggy, and the local economy depends on the recreation designation. Boggy is a backyard recreation area to Dolores and Cortez - it is not a remote area that receives limited visitation. Thus, Boggy Draw deserves a high level of attention in the decision that will protect its current assets. Including, but not limited to, scenery, trails, routes, and camping areas. The proposed buffers around the trail for various types of logging activity is miniscule. Input SWCCA has received emphasizes that the buffer should be widened to minimize visibility of logging equipment and the logging operation impacts.

It is also clear that the new logging roads cannot be returned to singletrack without significant effort, money, and time. While the decision has wording about rerouting trails where logging roads will be constructed, it is very vague, and lacks solid commitment and definition. One person's view of a road returned to a singletrack trail could be very different than another's. SWCCA feels the best solution is guaranteed reroutes prior to the logging project road reconstruction.

There does not seem to be adequate motivation or penalties for logging contractors to adhere to EA requirements. There were specifically protected trees in the Chicken Creek decision that logging contractors cut down during the logging operation. The absence will negatively affect the winter grooming operations indefinitely. The buffer around the Boggy trails is too small and leaves no room for error given the varying accuracy of GPS locating equipment and mapping. A large buffer, penalties, and/or continuous oversight would help with this potential problem.

Socioeconomics affected environment includes limited outdoor recreation economic data that is significantly higher than the economic data presented for the timber industry. Eight times the labor income annually and 10.8 times the number of jobs. However, under the environmental consequences for Alternative 2, the proposed action, the economic impact of the project on recreation does not seem appropriately weighted compared to the timber industry given the socioeconomic data referenced.

The proposed action contemplates recreation visitors going elsewhere, but still contributing to the local economy. Boggy Draw, based on its recreation designation, world class trail system, and gentle topography has a unique and high appeal with mountain bikers and families. It draws users from Durango, Telluride, Cortez, Moab, and beyond. These users play a significant role in the Dolores economy. If those users go elsewhere, they will no longer be contributing to the Dolores economy, this could include locals as well. Late spring, summer, and early fall is the peak time of year at Boggy. There is not another trail system in Montezuma County on par with Boggy during that time. Phil's World, near Cortez, is typically hotter, has less shade/canopy, no camping, and is less desirable mid-summer. The trails upriver require significantly more effort and skill than Boggy Draw and are not a viable option for many Boggy Draw users and visitors. The theory that users will use the other open trails at Boggy Draw is also flawed when it relates to economic impact. The economic boost that Montezuma County has experienced from visitors to Boggy Draw is a result of the recent trail expansion. The trail system now offers

enough alternatives to entice users to stay multiple days in the area versus just one day while passing through, or not stopping at all. Even a partial closure will detour potential visitors and they will spend their money somewhere else. The funds and time spent in advertising and promotion will be wasted, and visitors will alter their plans and bypass Dolores/Cortez for other riding areas and towns outside of Montezuma County. Just seeing the noticeable number of vehicles with bikes outside local restaurants and stores supplies an immediate insight to the real economic impact that benefits Dolores. Those are just the visible bikes, many are inside vehicles, campers, hotel rooms, or campgrounds, out of sight. In a nutshell, temporary displaced trail users will have a far more devastating economic impact on Dolores than contemplated in the decision. Local businesses that depend on the trail tourism will noticeably struggle as "temporarily" displaced trail users find new areas to ride.