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Comments:

First, thank you to Adam and the DRD staff for hosting a site visit to the project area and providing such good and complete information on the need for the project and how it's to be implemented and answering all our questions. It's very obvious the staff has put a huge number of hours into this plan and have implemented for the first time an integrated approach involving all facets of management of the areas affected.

A little background on me and the mountain biking group of which I'm a member to give you a sense of where I come from in my comments. Since 2010, working through FDRD, we've completed 36 major trail work days usually getting 25 to 35 folks out. In 2016 we approached Cindy about adopting Soda Creek, Groovy Uvi and the western end of Red. In 2019, we submitted to Cindy our suggestions for extensive reroutes on all 3 to make the trails sustainable and more fun to ride and hike. The work on Groovy Uvi was completed last summer. I and Tom Liston have also spent many hours working with Tyler on the proposed reroutes to Campion, Horseshoe Gulch, and Soda Mine Trails. So you can see how deeply committed I and our group are to our trails.

Now to my primary concern with the project. It's obvious from the plan and from Cory's comments during the site visit that there was a focus on maintaining the character of the CDT/Colorado Trail. It does not appear that that's the case for any of the other affected trails, yet Forest Service guidance indicates scenic values are of equal consideration to economic and other values. National Forest Landscape Management Volume 2 states: "The American people are concerned about the quality of their visual environment. Because of this concern, it has become appropriate to establish the visual landscape as a basic resource, to be treated as an essential part of and receive equal consideration with the other basic resources of the land". Forest Service Manual 2300, Chapter 2380 deals with landscape management and says in part: "Section 6 of the National Forest Management Act of 1976 (16 U.S.C. 1601) requires an assessment of potential aesthetic impacts during the interdisciplinary review of proposed timber sale areas that would include clearcutting and other cuts designed to regenerate an even-aged stand of timber. It also specifies treatment of cut blocks and protection of aesthetic resources." It further states: "The rules at Title 36 of the Code of Federal Regulations, Part 219, Subpart A, National Forest System Land and Resource Management Planning (36 CFR part 219, subpart A), include requirements for consideration, treatment, and protection of intangible resources such as scenery and aesthetics." Yet the visual quality impacts of this project seem to have taken a back seat to other considerations. On every trail there will be little to no tree cover left after all the cutting and burning. Hay, Horseshoe Gulch, and Blair Witch will be totally barren; Soda Creek will have just a couple of small areas left with trees; the west end of Red Trail will be almost totally barren as will Soda Mine. So for years to come after this plan is implemented, we'll be biking and hiking through a moonscape of scarred lands. Yes, eventually it will regrow, but it'll be years before there will be decent tree cover again. I'd point out that this area has the most complete, connected backcountry trail system in the District. Breckenridge has and is building very good trails, but their problem is connectivity; singletrack trails are not connected, invariably being separated by roads. That is not the case in the Swan Mountain area where the only road encountered is the 300 yards from the bottom of Red to the start of Soda Creek. So with the planned trail improvements, this area will only gain in popularity and use. Would it not be possible to preserve some tree cover in places along each trail with a combination of thinning and removing dead/cut trees from the forest floor? As an example, in unit 110, the southern end of this unit was thinned more than 20 years ago, but all the debris left on the floor. Could that not be cleaned up and any standing dead cut but the live trees left? Would not that help in diversifying the age of the forest, after all in 60-70 years will there be a noticeable difference in the age of units cut in 2010 and those cut in 2020? I somehow think not.

A recommendation for the Campion Trail. This trail currently ends in Tiger Run Resort private property; there is a user-built trail from near the Tiger Run Resort gate over to the bottom switchback on the Colorado Trail, but if

you're hiking or biking a loop out of the Soda Creek drainage, then you have to descend or climb those difficult switchbacks to get back. Also, the trail down to the Resort from the end of the proposed reroute is very steep and very badly eroded with no room to contour it to make it more sustainable. More logical would be to have Campion Trail follow the contour of the hillside from the western end of the proposed reroute over to the top most switchback. There is an old flume that starts near there that could be incorporated into the reroute and a rocky ridge to get through that would add interest to the trail. A small fence with an opening and signage showing the trail down to Tiger Run ends in private property could be installed to keep unnecessary traffic out of the Resort while still allowing residents and guests to access the trail network.

A recommendation for another small reroute on the Colorado Trail. Just east of the intersection with the Hippo Trail is a short, perhaps 100 yard, steep trail section that climbs directly up the fall line and is subject to tremendous erosion. The traditional answer has been to install log steps in the trail, but this leads to more erosion as the water pours over the logs. Hikers and bikers then begin to widen the trail to get around the steps. A reroute that contoured up this climb would solve the problem. At least do the NEPA on it and bank it for future work.

A recommendation for another trail project some of which would be outside the boundaries of the project. The Lowry Campground sits in a nice location, but is completely isolated from the trail system. I know one bandit trail comes down to the Rec Path about where the bench is. Won't it make sense to bring this trail up to standard, continue it to the south to connect to Groovy Uvi, and bring it into the system. There are already some bandit trails out there, parts of which could be incorporated into the new trail. At least do the NEPA on it and also bank it for future action.

Finally, please change the name of Soda Mine Trail to something without Soda in it; there's already confusion on the part of some between Soda Ridge and Soda Creek Trails? When Tom and I started scouting possible reroute for this trail, we came up with Redhorse as the trail connects Red to Horseshoe Gulch. Independently, Tyler came up with Redwitch with the same rationale. Would not one of these be acceptable?

Thank you for your consideration.