

Data Submitted (UTC 11): 12/23/2022 6:06:00 PM

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Comments: Mancos Trails Group (MTG) Comments on the
Dolores Recreation Access and Infrastructure Improvement Project
Draft Environmental Assessment

General Support -

Mancos Trails Group (MTG) represents non-motorized trail users in the Mancos Valley and currently counts over 1000 local residents and trail users as members and supporters. MTG is currently partnered with the Dolores Ranger District on their Chicken Creek Trails Expansion in the Chicken Creek area north of Mancos. Specifically, Mancos Trails Group has worked with the Dolores Ranger District to construct approximately 12 miles of new non-motorized trail. As such MTG is very focused on Proposed Actions in the Chicken Creek area, but also an interest in the other projects described for the full project area (Boggy Draw and Transfer areas) as our supporters utilize those areas to recreate as well.

As a proponent of and developer of single-track non-motorized trails within Montezuma County, Mancos Trails Group fully supports the Dolores Ranger District's efforts to improve recreation access and associated bathroom and parking infrastructure, improve recreation user experience, collaborate with the Town of Dolores and interest groups on motorized and non-motorized trail improvements, and address the negotiations made during the objection period of the Salter Vegetation Management Project with single-track trail reroutes in the Boggy Draw Trail system area.

Specific comments related to the Proposed Action -

Expanding the parking facilities and adding restroom facilities will help to enhance the recreational user experience and reduce overall direct effects from increasing recreational use in the project area. Specifically, the parking lot on the Chicken Creek Road (FSR 385) will be especially beneficial for the use of the recently completed Chicken Creek Trail expansion. It will spread the use out and lessen the impact on the existing Chicken Creek Trailhead located on the Millwood Road (FS 599). This parking area is frequently fully occupied with passenger vehicles and trucks with trailers. Since the proposed parking area on FS 385 is about 130 feet higher in elevation than the existing one on FS 599, it should, to a small degree, help to give a better starting point for winter activities.

The Non-motorized trail reroutes in the Boggy Draw area, will eliminate most of the physical impacts from the Salter Vegetation Management Project on the recreating public who utilize the area. More specifically, decommissioning approximately 2.8 miles of existing single-track trail located on timber transportation routes and constructing approximately 4.6 miles of single-track trail will retain and enhance the recreation experience consistent with a relatively closed single-track trail system. In addition, by applying the design element, "The 50-foot area of influence where additional measures would be taken to protect scenic resources, per Scenery design element 7 of the Decision Notice and Finding of No Significant Impact for the Salter Vegetation Management Project, will help to enhance the user experience for the resulting trails. The Boggy Draw area currently attracts people from throughout the US, and these actions will help to maintain the area as a very favorable attraction for the District as well as for the adjacent Town of Dolores.

MTG also fully supports the proposed Town Trail that would be constructed to connect the Boggy Draw trail system to the intersection of County Road W, Boggy Draw Road, and FSR 526. This trail makes much more sense than having the Town trail end at the County Road W/FS 527 intersection and then have cyclists ride on

County Road W to connect with the existing Boggy Trail system.

Increasing allowed width of side-by-sides on the Boggy Draw area motorized trails makes sense since many of those routes are on Forest Service system roads and prior timber roads where maintaining a wider trail corridor does not cause any negative impacts. The proposal would help individuals who make the common upgrade to their machines with wider tires which causes them to no longer meet the <50" standard.

Additional comments on specific text or missing information in the EA:

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Need for The Proposal

Comment: There is no need identified for the redesignation of motorized trails from less than 50 inches in width to vehicles up to 62 inches in width. Is this part of a nation-wide effort the Forest Service is undertaking? We suggest adding some explanation; perhaps at least duplicating language from your Proposed Action. For example: There is also a need to address the growing popularity of 62- inch wide OHVs (side by sides) in an area where limited tread work would be required to accommodate the larger motorized vehicles.

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2. Bathroom installation:

Questions (and it seems that the answers to the questions could be added to the background information or assumptions with the Proposed Action):

If there are going to be three parking lots for the Boggy Draw area but you are only building a restroom at the Boggy Draw Trailhead, what facilities will be available for the other two parking lots along the Dolores-Norwood Road.

Similarly, what facility will be at the parking lot on the Chicken Creek Road (FSR 385)?

A bathroom is proposed for Transfer Corral. I can't imagine that use at the Transfer Corral is so much higher than the use expected at any one of the three proposed new parking lots that a [permanent] restroom is needed there at the corral but not at the other locations. This seems especially relevant to the existing Chicken Creek Trailhead that has both summer and winter use and the summer use is expected to increase due to 2022 completion of the Chicken Creek Trail Expansion with 12 miles of single-track trail.

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General Implementation

Comment/suggestion: An additional design element should be added as shown below as #3:

3. As many of the existing ponderosa pine trees at the parking lot construction and expansion areas, most specifically at the Boggy Draw trailhead, shall be retained during construction.

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Recreation > Affected Environment > Proposed Action Alternatives > Proposed Action > Direct and Indirect Effects

Comments on the redesignation of the Boggy OHV motorized system to accommodate 62" and narrower vehicles provides an opportunity for these types of motorized users to enjoy trails previously unavailable to them:

The effects of redesignation don't seem to be addressed well.

A positive effect of this action is that this would allow recreationists to use machines with up to 4-passenger capacity. Typically machines in the <50" size are only 2-passenger machines.

Other effects of redesignation could include:

Potentially, a substantial increase in the number of recreation users in the area would result. Based on personal

observation, it appears that there are substantially higher numbers of current side-by-side owners with OHVs >50" in the use/commuting area than those that own <50" machines. Although some of the owners with >50" machines already use the trails in the area, logically it seems like many more with machines >50" would begin to use the trails in the area.

Potentially, a decrease in safety and/or an increase in user conflicts due to higher speeds driven could occur. Based on personal experience and observations, it is typical that larger machines (i.e., >50") are also more powerful, and average speeds are higher by users of the larger, more powerful machines. The effects may be small and/or not easily measurable, but it seems they should be recognized.

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Comment on the Recreation Direct and Indirect Effects section: It doesn't seem as though the effects of the placement of a bathroom at Transfer Corral are addressed.

A positive effect on the recreational experience of users in the vicinity of Transfer Campground would result from one or all of the following:

- Eliminating unsightly human waste in the vicinity of the corrals,
- Reducing the inconvenience of those corral area recreationists who walk all the way over to the campground to use facilities,
- Reducing the inconvenience to paying campground users from recreationists from outside the campground coming in to use campground facilities.

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Comment/suggestion for the Direct and Indirect Effects section for Invasive Species > Affected Environment > Proposed Action: An additional design element from the list on Page 5 of the EA for Rangelands and Rare Plants could be included in the paragraph:

"Equipment shall be washed before entering a new area of project implementation."