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RE: Comments on the Draft Environmental Impact Statement (DEIS) for the Rico-West Dolores Roads and Trails (Travel Management) Project.

Greetings Derek and Debbie and the entire planning team!

I trust things are going well for ya'll up there in Colorado. I've reviewed the DEIS for the Travel Management Project and wish to offer these comments. I regularly use the lands at issue for a variety of recreational pursuits and will be directly impacted by your decision. Please incorporate these comments into the record. Please also carefully consider the comments and suggestions as you make your way to the final decision.

Key Comment:

The key problem I see in this planning effort is the lack of a true range in the Action Alternatives (Alternatives B-E). The problem is that appropriate and logical options to address the planning issues have been improperly precluded by a set of fatally flawed Alternatives.

I suppose I could add a bunch of legalistic verbiage here. However, I don't think that will help. And I don't want to insult your intelligence. I know you all are well aware of the agency's planning guidance and mandates regarding Alternative development.

I will say this. Just a quick glance at the Alternative section in Chapter 2 sure looks like you folks have predetermined the outcome of most of this project. True or not, precluding viable options suggested by members of the public who are most directly affected by this project, via leaving them out of all of the Action Alternatives, is unwise as it leads the public to the conclusion that the "fix is in" and that all those words in NEPA and the USFS planning regulations about meaningful public involvement mean very little.

Yet, I remain optimistic. Here is my Key Suggestion

I've included a more detailed discussion of my concern in the "Additional Comments" section below but I wanted to suggest path forward here.

I remain optimistic the final plan can be something of a “win win” or a “mutual beneficial outcome.”

My experience is that FEIS analysis, review of public comment and the process of formulating a final plan often leads planning teams and decisionmakers to look harder for opportunities that would more effectively address the needs of the various competing interests.

Not an easy job, I will admit. But we have a decision space that includes “verification” of the existing travel network (the 2014 Motor Vehicle Use Map) and also allows adjustments in ROS and Forest Plan direction. We also have Forest Plan that includes direction to provide a shared (not exclusive), quality experience for motorized and nonmotorized visitors. We also have resources available to accomplish mitigation and maintenance goals (and to comply with the design criteria in Appendix B) via Colorado’s OHV program and numerous active volunteer groups.

During my past work as an OHV advocate I noted many of the best managed recreational systems approached their work as an ongoing effort. In stark contrast, many units that had a lot of problems seemed to believe that once they finalized a travel plan all that would be left to do is to pound signs in the ground and enforce closures.

One common feature of the best managed areas/systems was a section written into the latest decision documents addressing future planning needs. Why is this so critically important? My opinion is simply because the federal agency personnel turnover is high. A section in any planning document provides a necessary sort of “institutional memory” that assist new staff and user groups with on this ongoing effort.

With this in mind, I strongly urge the planning team and the decisionmaker to reconsider the recommendations I made in my scoping comments regarding how an Alternative might respond to the issue 1.10.1.1:

The approach this alternative would take:

- Instead of closure, mitigate potential impacts to the environment by adopting a 'monitoring and adaptive management' approach similar to the previous decision's monitoring and implementation schedule (see section 2.10 on page 33 and 34 of the 2009 Rico-West Dolores Travel Management Plan Environmental Assessment EA).
- When responding to concerns from “local communities and affected private land owners,” look for alternatives to closing existing motorized routes. Providing new non-motorized opportunities that address those concerns is not precluded by any law or regulation whether via this planning process or a future NEPA process. For example, instead of closing the Winter Trail to motorized use an alternative should be developed that provides for a non-motorized trail between Winter Trail and the Burro Ridge Trailhead. Again, such a solution could be directed via this planning process or, if necessary, a separate NEPA process in the future.
- Instead of closing routes to motorized use, all alternatives should use visitor education, signing and trail layout to minimize recreational user conflict.
- Mitigating potential issues with patented mining claims by proposing a “re-route” around the area.

Also, assuming some really good solutions may be unavailable because of limits in the current planning process, I’d like to reiterate a suggestion that PAPA makes in their comment letter dated 7.14.2016:

We strongly encourage the agency to discuss future consideration of new motorized and non-motorized routes in the final decision document. Satisfying desires of non-motorized users at the expense of just eliminating multiple numbers of currently designated multiple-use trails automatically creates a disparate treatment situation for motorized users of those trails.

The USFS should include a section in the final decision document that recognizes that the current planning effort will only be an initial designation mostly necessary pursuant to the November, 2005 Travel Management Rule, which will not, and is not intended to, fully address the needs for both motorized and non-motorized trail opportunities and/or meet the objectives of the Forest Plan.

PAPA people are willing to accept the somewhat limited nature of the current planning effort and view the current effort as the initial step of an ongoing and dynamic effort to provide a wide range of recreational experiences for all user groups.

IMPORTANT NOTE:

The agency may respond by noting this suggestion is reflected in item 5 of the Actions Common to All Alternatives (DEIS page 26). But there is an important difference. The difference is that we are suggesting the final decision documents describe specific items that need to be addressed via the iterative, ongoing process describe in item 5 of this section. We caution the agency not to leave the what needs to be changed to some future TAP or other annual assessment. The knowledge gained via the EIS effort is invaluable and, in my experience, is all too easy to lose once the plan is final.

Additional Comments:

1. Additional discussion regarding my Key Comment and Suggestion

I should begin by saying that I appreciate the agency adopting issue 1.10.1.1 Loss or Reduction of Motorized Recreation Opportunities. I believe that proper analysis and developing actions that address this important issue will lead to a better final decision.

That being said, the project responded improperly to this important issue. This project uses this issue to respond to the proposed action, not the existing condition. And by my reading, it primarily uses the issue in the analysis, not in Alternative development.

Indeed, all of the Action Alternatives result in a significant reduction in motorized trail riding opportunity. To assert any of these Alternatives responds to a concern over the loss of single track and other OHV opportunity regionally across the SJNF is to defy logic.

I can't tell you how disappointed I am that the planning team couldn't develop at least one Alternative that includes actions other than closure to address concerns raised by the public and staff.

"What about Alternative C ?!?" In my minds ear, I can hear someone on the planning team assert that Alternative C does exactly that. But that isn't the case. Not on the ground and not even in the DEIS. The DEIS admits Alternative C is not intended to respond to the loss of motorized recreation opportunities regionally and on the SJNF (via past agency decisions). Instead, the DEIS states it was formulated to responds to concerns about trail clearing, concerns about ATV and UTV riding opportunities and "riding opportunities restricted under the Proposed Action."

To make matters worse, the analysis in the DEIS related to issue 1.10.1.1 is flawed. When assessing effects related to this issue the DEIS tells the reader and decision maker that certain motorized loops are retained or provided in this or that Alternative or via this or that route. But the "loops" the DEIS presents are not loops to anyone who professionally manages recreational use.

I very much like the way the PAPA comments framed this point:

Comment 3: A concern regarding how the USFS considers loop riding opportunities.

When discussing the analysis presented in the DEIS, PAPA people became concerned that the USFS may not fully understand how adoption of Alternatives B-E would affect loop riding opportunities.

One of the biggest problems with all of the presented "action alternatives" (Alternatives B-E) is the elimination of key loop routes. Our concern, after reading the DEIS, is that the USFS may not fully realize the negative effects of the proposals. For example, requiring off-highway motorcycle riders to utilize miles of roads in order to make a

loop ride does not constitute making a loop ride. **Imagine how hikers would view their hike experience if a 5 mile hiking loop included hiking along 2 miles of gravel road or a paved highway.** Moreover, requiring trail motorcyclists to use roads elevates a perception of recreational conflict, may pose safety concerns and fails to provide the desired user experience.

As noted above, PAPA people understand the need to develop a final plan that properly responds to the issues and concerns of all forest visitors but should not subject current users to disparate treatment in doing so. PAPA's comments and suggestions below attempt to maintain "loop riding experiences" while addressing other recreational needs and minimizing resource impacts if they exist.

Suggestion:

When evaluating loop riding opportunities in the FEIS analysis, as well as when formulating the final decision, the nature of the route (paved road, gravel road, primitive road, trail etc.) must be taken into consideration such that highways and gravel roads are not substituted as replacements for actual trail connections.

[Bold and underline emphasis added.] I agree with PAPA here. A proper analysis and hopefully a better decision will result from accurately assessing the impacts of each alternative to issue 1.10.1.1. Any description any analysis of a loop must contain information about the nature of the route(s) making the loop.

2. Issue 1.10.1.4 *Environmental Impacts* is redundant with existing guidance and improperly narrowed the range of Alternatives and improperly impacts the decision space

The concern that motorized use designations could cause impacts is already addressed via route designation criteria and other agency guidance/mandates. Adopting this as a planning issue embeds a redundancy for concerns about protecting natural resources over providing recreation. To develop alternatives based on this redundant issue improperly narrows the alternatives and steers the decision maker against alternatives that allow more motorized uses.

3. I strongly support the specific route suggestions made by PAPA in their 7.14.2016 comment letter.

Thank you for considering these comments and suggestions. I look forward to being involved as the process moves forward.



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