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Comments:

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Attn: Derek Padilla

Dolores District Ranger

Debbie Kill

NEPA Coordinator

Dolores Public Lands Office

29211 Hwy 184

Dolores, CO 81323

Re: Comments on the Rico-West Dolores Roads and Trails Project Supplement to the Draft Environmental Impact Statement

Dear Mr. Padilla and Ms. Kill,

Thank you for allowing me an opportunity to comment on the additions and revisions in the SDEIS. Although I submitted a comment letter last year, my comments in this letter are specifically focused on certain analysis and summaries contained in chapter 3 Environmental Consequences of the SDEIS regarding two proposed new trails. These are a connector trail from Burnett (NFSR 422) down to the historic RGS railroad bed and another utilizing the railroad bed as a motorized trail down to the Montelores Bridge being referred to as Rio Grande Southern 3.

#### Conflict Between Motor Vehicle Use and Adjacent Populated Areas

With regards to the Town of Rico and adjacent residential areas as outlined in the chart in Table 3-49, from personal experience I disagree with the analysis. First of all, the assumptions regarding disturbing sound levels of motorized OHVs allowed (louder than a chain saw) in the report are exactly that, assumptions. The formula used for the analysis is flawed as it does not take into account the reverberating effect of the surrounding mountains which greatly magnify the sound volume. Nor does it take into account the constant revving of engines which increases volume and the fact that most bikers ride in packs. Also, with a motorized trail along the RGS railroad bed, due to its flat wide surface, speeds would be increased along with noise levels and safety issues. The summaries outlined in the chart may sound fine on paper but the reality is quite a different matter. For example, regarding the Burnett Trail and the proposed Burnett Trail Connector, it's stated that "there would be no sound impacts to homes in Rico due to distance from the Burnett Trail" and that sound impacts from the Burnett Connector on adjacent private property "would create a very minor sound effect". Anyone who lives in the Rico area knows that this summary is simply not true. Rico residents are well-aware that motorcycles riding on the Burnett Trail can be heard. And I can personally attest to that when they are riding on the Burnett trail above my land. The chart also states that the Burnett Creek Connector would be within ? mile of private property but more than ? mile from structures currently. This may be true at this time but as I mentioned in the previous letter I submitted last year, I'm planning on building a home on the south end of my property which would be directly across from Burnett Creek and more homes on my parcel are expected to be built in the future. There is also a home (hidden by trees) directly across highway 145 and numerous others in the adjacent subdivision. It's mostly open fields in this area so the sound will carry and reverberate through the surrounding mountains especially when motorbikes near the RGS railroad bed. Also, it's important to point

out that Rico is a growing community and my family's property is within the 3-mile annexation limit for the town and near the site for a proposed town sewer system. It's zoned residential and land use codes permit up to 18 or more new homes to be built there and possibly more if annexed.

#### Other potential conflicts

As quoted in the SDEIS regarding Town of Rico Area "Trespass into populated areas from illegal off trail riding has not been observed as an issue for these trails. However, in alternatives C, D and E, new trespass concerns could be raised for the proposed new Burnett Connector if motorcycles try to 'cut across' into the Town of Rico rather than riding the trail. Use of the connector trail would be encouraged but use of the road that connects to town streets would not be prohibited in these alternatives." This of course is exactly what will happen which makes the addition of a Burnett Trail connector in alternatives C, D & E ineffective and problematic.

#### 3.14.2 Effects of alternatives on Local Government Plans as they pertain to the Town of Rico

The text states that, "To varying degrees, the alternatives respond to the Town of Rico's goals for providing nonmotorized trails for pedestrian and biking recreation and a broad range of outdoor activities. Alternative A might conflict with these goals because of the number of intersecting trails that include motorcycle use. Alternatives B, C, D, and E take steps to address the goals by closing or rerouting trails so that motorcycles access the town via Hwy.145. Therefore, alternatives B, C, D, and E would not conflict with the Rico Regional Master Plan. This is incorrect. Since Burnett Creek lies within the proximity of the 3-mile Rico town regional master plan, creating a connecting motorized trail from the Burnett Trail down to the RGS railroad grade in Alternative C, D and E would be in direct opposition to the town's goals and quiet use character as evidenced by the town's regional master plan as well as the many comments submitted by town representatives and residents throughout the scoping process.

#### 3.2 Watershed, Riparian and Water Resources

In table 3.7 it lists the Dolores River in the Rico Valley in 'FAIR' condition and functioning at risk. Table 3-14 Alternatives impact in Wetland Areas states that creating a Burnett Trail connector to a motorized Rio Grande Southern Trail would include 4 stream crossings, within 100 ft. of Riparian zones for 1.5 miles within the roadless area. Based on the observations and summaries in the report, creating two new motorized trails that directly impact both Burnett Creek and the Dolores River would be unwise for the overall health of this watershed.

#### 3.4.2 Affected Environment

As noted in table 3.16, various trails currently cross soil map units prone to mass movement. The proposed RGS 3 and Burnett Trail Connector would cross these soil types

#### 3.8.3 Affects of Alternatives on Heritage Resources and Historical Sites.

A referenced 2009 report recommended blocking entrance to the historic Rio Grande Southern railroad from trails or trailheads in proximity to the grade. This would apply to the Wildcat and Tenderfoot trails. Since there is no connector trail along Burnett Creek down to the RGS railroad grade at this time, it's not mentioned in the report but no doubt would be and the same criteria applied if it existed. This proposed connector trail is also in very close proximity to two historic coke ovens.

In conclusion, it appears that the environmental studies presented in the analysis and the social and economic impacts presented along with the refinements made to the Alternate B (proposed action) in the SDEIS make it clearly stand out as the best choice over the others. It also respects the Town of Rico's quiet-use character while providing nonmotorized trails adjacent to Rico for passive recreationists. Keeping disruptive and damaging motorcycle activity away from populated areas, grazing habitats, historical sites and sensitive wetlands and riparian areas is vital. I'm happy to see that this has been addressed in the SDEIS.

Thank you for allowing me the opportunity to express my concerns and comment on this extremely important decision that will directly impact the lives of so many for years to come.

Sincerely,  
Lynn Markey  
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