

**From:** info  
**To:** [FS-r02admin-review](mailto:FS-r02admin-review)  
**Subject:** Objection Letter  
**Date:** Friday, December 29, 2017 9:04:58 AM

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December 28, 2017

Forest Supervisor Kara Chadwick  
Objection Reviewing Officer  
San Juan National Forest  
15 Burnett Court  
Durango, CO 81301

Submitted via email to: [r02admin\\_review@fs.fed.us](mailto:r02admin_review@fs.fed.us)

Re: Objection-Draft Record of Decision and Final Environmental Impact Statement for the Rico West Dolores Roads and Trails (Travel Management) Project Dated November 14, 2017

To Forest Supervisor Kara Chadwick:

The purpose of this letter is to submit an Objection to the DROD and FEIS for the RWD Travel Management Project dated November 14, 2017. I am the owner/land owner of the High Camp Hut located in the San Juan Forest. I am also a concerned citizen and these comments come from the time I have spent in this region hiking and horseback riding.

As required by 36 C.F.R. & 218.8(d) the objector's name, address, and telephone number. Email is also included

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Interests and participation of objecting party.

I run a back country cabin that is used by many people from this region and beyond. I receive many comments from my guests on how they value the peace and quiet, and how important it is for them to find places to go for exercise, enjoy solitude, and different forms of adventure in a non-motorized way. They desire the opportunity for a way to disconnect whether it is for an hour, a day, several days or even a week. I have done lots of research for my previous letters stating the importance of silence in the forest. And I pointed out that in USFS 2015b "Survey respondents indicated that the non-motorized trail use accounted for 66% of all use. 4% reported that motorized use was the primary focus for their trip." This survey was for the San Juan Forest. I attended scoping meetings in Dolores, I was interviewed by a consultant group and I submitted various letters to the RWD Travel Management Team the last of which was dated 7/15/2016 which was 9 pages long! I also attended an outfitters meeting during the scoping process.

Objection #1- Seasonal Closure dates should be from September 9th to June 30th for motorized use on single track trails

-As stated in my comment letter (7/15/2016) #6 Seasonal Restrictions are very important to decreasing the damage that occurs to trails. There is no system in place to close trails or open trails to motorized travel that deals with changes in precipitation, melting of snow, or accumulation of snow so there should not be a blanket date range for trails being open. It is the Forest Service's job to have the least amount of damage to the natural resource. We all know that water is the main culprit to trail damage and until there is a good monitoring system motorized trails should be open for a minimal amount of time.

-Closure dates also effect elk calving areas and rutting areas. Over the years there has been a tremendous drop in the number of elk that we see around High Camp. This effects revenue for my cabin and Rico when hunters do not fill their tags they do not want to come back. There is a difference of opinion as to how healthy the elk populations are in this area. I can speak for my observations from owning High Camp since 2005 until now. It was very common to see herds of 50-60 elk in the meadows above High Camp when I first started running my business. With binoculars we could always see them grazing on Sheep Mountain. Now, as in 2017, I rarely see them on Sheep Mountain any time of the year. And now I rarely see a herd of 10 at a time. This year only one group of hunters staying at High Camp harvested a small bull. Many of the other hunters in the area did not even see an elk. They were very disappointed. I do not think I am the only one who has observed this decrease in numbers of elk in this region. Some attribute this decline to the timing of when many trails in this region became motorized.

-#20 referenced from the letter to the Forest Service dated 7/15/2017 There has been a huge decrease in sales for Elk tags during hunting season. In 2005 900 antlerless hunting permits were issued, and in 2015 only 195 antlerless hunting permits were issued for Section 71. The CPW has reasons to believe the Elk herds are declining, but the Forest Service for the Dolores District still maintains that there is a healthy population of Elk. The Forest Service needs to look at other data and listen to people observing similar findings as the CPW. Quote from my letter on 7/15/16- "After speaking with Dave Halper with the CPW he thinks the calf/calf ratio is down to 28/100. This is the lowest he has ever seen. It is so low that it is hard to build the elk herd up again."

-It should also be noted that Moose seem to be moving into certain areas and need protection from popular motorized trails. We have seen moose staying at High Camp this summer and they are still there as of late December 2017.

-I feel as a participant in the process I was lead to believe that if Alternative B was chosen that the Seasonal Closure dates were not going to be changed.

Objections #2 The East Fork Trail was not closed to Motorized Use

-# 12 in my comment letter (7/15/16) As stated in the RWD Travel Manage Plan with various Alternatives "The District does not have detailed monitoring data that quantitatively describes levels of use within the RWD area specifically." Basically they do not have any numbers of which are the most popular trails used for non-motorized versus motorized use. Both user groups, motorized vs non-motorized users, will increase in numbers and use of trails.

-#13 in my comment letter (7/15/16) The East Fork Trail was not evaluated though a formal assessment or site visit as stated in the RWD Travel Management Plan with various Alternatives. The East Fork of the Dolores should be one of the three forks of the Dolores that is not motorized. The main fork and the west fork of the Dolores both have roads along them.

-The East Fork Trail is used by many outfitters that are all non-motorized. They contribute money thru their user fees and this trail should be maintained as non-motorized. The San Juan Hut System with their trip from Durango to Moab uses this trail for Mtn. Bikers, there are many fly fishing companies that fish the lower part of the East Fork for native cutthroat, including Telluride Flyfishers and Telluride Outside. Circle K has permits on this trail to take horseback riders. The Telluride Academy also has permits for this trail. This trail is also popular for public hikers as it is not too steep but is very scenic. Many hunters can access this trail from the top of Bolam Pass and from the bottom at the start of the East Fork Trail. Monies collected from outfitter fees should only be used to keep this trail non-motorized since they are all non-motorized outfitters.

-This area boards the Grizzly RNA and should be kept a quiet zone.

-This trail is unique to this area as it is a parallel trail that you can reach the same point on top of Bolam Pass by hiking up the East Fork or driving up the Bolam Pass road. They should not both be motorized.

-The East Fork trail never went thru the NEPA process before becoming motorized. Now that it has become motorized the Forest Service has had to spend more money repairing it due to the trail not being sustainable to motorized travel.

-I do support the idea of closing the road that goes down the East Fork from Bolam Pass.

Objections #3 No compromise in trail use for non-motorized users.

-I am very disappointed that of all the trails that the non-motorized users wanted closed to motorized use not even one was closed completely! With any plan I think there should be some give and take as to which trails are motorized. All the motorized trails in this area never had to go thru a NEPA process and this District has never recognized this fact. Alternative A should have been prior to allowing motorized travel on hiking trails. Many of these trails are not appropriate for motorized use and they are not sustainable. This is proven by having the Calico National Recreation Trail closed to all users for 3 years. This is disappointing that the damage even happened to this trail. It proves that this District does not have the resources to protect against resource damages. If trails are motorized they need to be designed better and have a system in place to notify the public when these trails are open or closed due to potential resource damage. Motorized Trails need constant observations so that they may be closed before the natural resource is damaged to the point that the trail is closed to all users.

-Many of the proposed motorized trails are not sustainable and will require large amounts of money to repair them. This is not fair to the non-motorized user! Time will tell..

There are a few good things in this plan. I want to mention that this plan did the right thing in protecting quiet use in and around the town of Rico. It is great a community can influence positive outcomes. I am also glad that the lower part of Bear Creek is closed to motorized traffic. But all of Bear Creek should be closed to motorized traffic. I have heard Gold Run is dangerous to horseback outfitters when they meet motorcycles. The Gold Run Trail is another example of not being designed properly motorcycles.

I hope you will also read and take into consideration the comments of Bob Marion. I have never met a person who so thoroughly does his research. He knows this country better than anyone!

In closing- the non-motorized user deserves better! It is not fair or right that this plan is so heavily weighted to the motorized user. The quiet user is easier on trails, spends more money where they visit and there are more of us that want to just enjoy the Forest!

Sincerely,

Cindy Farny