

3-12-21

From:

Town of Dolores
420 Central Avenue
PO Box 630
Dolores, CO 81323

TO:

U.S Department of Agriculture
Forest Service
Dolores Ranger District
San Juan National Forest
29211 Hwy 184
Dolores, CO 81323

RE:

Project Title: Salter Vegetation Management

Chad Wheelus, Mayor, Town of Dolores

Date

Please accept these comments regarding the proposed Salter Vegetation Management Project on behalf of the Town of Dolores Mayor and Trustees.

Introduction

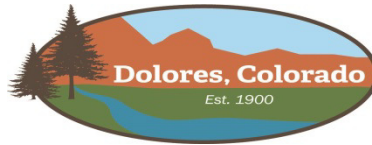
The Town of Dolores supports Alternative 2 for the Forest Service to meet the goal to improve the differences between the existing forest vegetation conditions and the desired forest vegetation conditions. They include:

- improve resilience and resistance to epidemic insect and disease outbreaks,
- increase the structural diversity of the ponderosa pine forest represented across the landscape, and
- provide economic support to local communities by providing timber products to local industries in a sustainable manner.

The Town has the following comments:

Economic Concerns

There is not adequate language in the Draft EA addressing the negative economic impact due to the temporary loss of recreational opportunities. We suggest that the Draft EA needs more attention regarding economic impacts.



We would like to direct the Forest Service to the Dolores Chamber website as this demonstrates current identity of Dolores. <https://www.visitdolores.com>

The concept of a quality outdoor recreational experience has become the economic capstone of our focus and efforts. To that extent it needs to be recognized that FS Road 526 leading to county road 31 and either launching or landing in Dolores via 11th Street has been a significant focus point for recreationists to have access to our retail, lodging and services. These dollars are critically important to local business vitality and sustainability. Although mountain biking has drawn a lot of attention in this process it is also important for FS to understand that the historic use of the Forest via 11th Street and CR 31 includes hiking, dispersed camping, hunting, access to McPhee reservoir, and winter recreation like skiing, snowshoeing, sledding, and snowmobiling.

These activities currently serve as the primary economic driver for this town that is not only used by local recreationists but draws visitors from outside the town limits and county to the area. Boggy draw was featured in Outside magazine as a number 1 destination area. Our priority is to maintain safety and access around this driver.

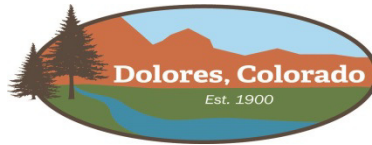
As one example, the Boggy Draw trail system is an extensive system of public land loop trails just outside of Dolores. With over 30 miles of well-groomed trails, Boggy Draw is an extremely popular destination for tourists and locals alike. There are several loops with four distinct levels of difficulty, which provides an outlet for any level of skill. We appreciate the Forest Service's efforts to recognize and treat differently the Boggy Draw trail system from the other areas in the project. To accompany the recognition of this significant recreation area, we offer these comments;

- More specific data is needed on reclamation procedures such as new and existing roads.
- More specific data or models need to be developed and shared for buffering existing trails.
- More specific data on the process for addressing slash piles.
- For this area specifically, we are recommending the Forest Service consider requiring the contractors to work with the Southwest Colorado Cycling Association (SCCA) on "best practices" for how to use existing roads as trail detours instead of a completely closing trails; to advise on trail detour routing and signage, and how this information will be provided to the public. We suggest the trail realignments and restoration work should be funded by proceeds from the Salter project.
- More specific data needs to be developed and shared on Boggy Draw harvest plans.

The Town of Dolores also requests more specific data on project impacts to hunters.

The Town engaged in conversations with local business owners around recreational economic drivers that sustained their establishments. Among the highest-ranking recreational activities was hunting. Both in terms of retail sales and lodging, the local business owners indicated that hunting, and more specifically big game hunting was a vital economic recreational sustainer for the success of local businesses going into fall and winter months.

Local business owners also projected that this recreational experience warranted strong protection because of its large purchasing footprint. That is to say that more than other - maybe more passive recreational activities that occur in the proposed Salter Y project area, hunters cover more of the entirety of the Salter Y project area. In addition, hunters come with lots of potential infrastructure needs.



These include needs to purchase food, beverages, ice, fuel, tags, ammunition, supplies, hardware, and they often also seek lodging, laundry, and restaurant services along with their recreational visit to this area. This could yield significantly more economic viability than other more passive or quiet use activities require. When talking to local businesses, this sector of recreational users is what gave local business the final boost before the long winter months. Any further impact to big game hunting areas could significantly reduce the draw of this recreational sector to the area and further impact those businesses who often count on that income to continue to pay into Dolores town sales, property and business taxes, and licensing. This knowledge in conjunction with the knowledge that big game such as elk are in a severe decline in the Salter Y area make it imperative that this project does the most it can to reduce any further impacts.

Safety, Noise and Impacts to Residents

- We ask that more specific data on how speed limits and slow down signage will be posted and enforced for contractors and the public.
- The speed limit at the point where Montezuma County Road 31 and where it becomes a town road on 11th Street is 15 m.p.h. We request this information be made known to contractors and that contractors are notified that this speed will be enforced.
- We request that the Forest Service require contractors to have Jake Brake mufflers on all applicable trucks.
- To prevent project truck traffic from using town roads other than 11th Street, we request the Forest Service work with the town to designate a truck route.
- To alleviate disturbances to residents, we request the Forest Service work with the town to notify industry that truck traffic will be limited on town streets to certain times of the day. The Town will not be allowing commercial truck traffic on 11th street from 10 pm to 6 am throughout the duration of the Salter Y project.

Additional Closure dates: To Be added Under #2 Public Safety;

The Town is providing the additional no harvest activities or hauling dates for recreational compartments 1-6 Boggy Draw area and or use of FS road 526/ CR 31 leading into 11th Street through the Town of Dolores. No transport of harvest activities or hauling should include the following critical economic impact dates for the Town of Dolores.

1st Saturday in June: Dolores River Fest

4th Saturday in June: Ride of the Ancients Gravel Grinder

1st Saturday in August: Dolores Boggy Draw Beat Down

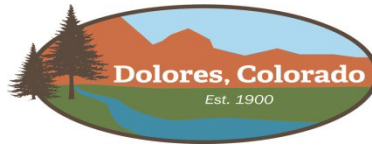
1st Saturday in October: Dolores Harvest Fest and Car show

It is recommended that the Town work with a County representative and FS project supervisor to annually identify and confirm significant event days so industry is aware and can adhere to the necessary closure to minimize risk to public safety during congested and economically important events to the town.

Wildlife

We request the Forest Service work closer with the Colorado Division of Parks and Wildlife to mitigate impacts to wildlife.

We have heard from Parks and Wildlife that there is a continuing decline in elk populations in this area. There is not enough information in the EA to understand the impacts in transitional corridors, calving and wintering grounds. We are requesting more information be provided on the potential impacts and any further mitigations that could be considered to aid in making sure this project does not exacerbate this situation further. Particularly because Dolores is a transition zone and is surrounded by calving and



wintering habitat.

The Town is recommending the FS work very closely with Parks and Wildlife staff and biologists to identify and isolate key big game areas that involve winter range, calving and transitional areas to protect these locations from logging or the reopening of storage roads. This isolation and protection should occur throughout the entire Salter Y project.

In addition, the Town requests that some of the proposed guzzlers are located in these isolated and protected areas to aid big game in accessing water and potentially reducing the need for migration across project areas to reach water sources.

There is not enough information in the EA to understand impacts to turkey habitat. We have noticed that the project area encompasses the totality of the turkey habitat range. What further mitigations could be considered to aid in making sure this project does not disrupt more than 50% of the turkey habitat area at one time.

The Town is requesting more clarification on potential Impacts to water quality from possible spills and erosion due to the removal of trees and vegetation as well as any remediation efforts that will be done to mitigate any affects it would have on fisheries. In addition, the Town thinks the Forest Service needs to develop a clear and expected management practice for this large project regarding water quality mitigation or repair or restoration.

The Town of Dolores greatly values the Forest Service receiving our comments and would value the support in championing these recommendations and guidelines to aid in making this project favorably received by the Town, its residents, local businesses, visitors, and our wildlife neighbors.

Your strong attention and considerations are appreciated.