

Thank you for the opportunity to comment on the Initial Proposed Actions for the Integrated – Junction-Falls Integrated Resource Management (J-FIRM) Project. I live on County Road 205 and regularly hike, bike, and ski on trails in the project area. I am a retired Hydroecologist and spent more than twenty five years working on water related projects in the Four Corners for the United States Geological Survey and the National Park Service.

During the past year I have taken my time to be involved in the J-FIRM process, and have attended some but not all of the scheduled meetings. During this process a pre-scoping document dated 1/31/2022 was shared and input was requested from the working group. Group coordinators indicated an expanded version of the proposed actions presented in the pre-scoping document would be developed and provided to the public for review. I was disappointed when the J-FIRM scoping document dated 9/14/2022 went out for public comment with only a few minor changes from the earlier pre-scoping document. I feel the current version of the scoping document lacks sufficient details and information needed for the public to provide well-informed comments.

As a member of the public who cares about these lands, I recommend the Four Rivers Project take steps to make it easier for the public to participate in the planning process. Future meetings should be announced with at least four weeks' notice and dates for these meetings should not be changed. Agendas should be provided at a minimum of one week prior to each meeting, announcements posted in public places, detailed notes and relevant information from previous meetings should be sent out promptly.

I appreciate that an informal extension period was granted for the public to review and comment on the scoping document. Unfortunately there was been little public awareness about the J-FIRM project in the Durango area until an article came out in the Durango Herald on 10/12/2022, just two days before comments were due.

The J-FIRM project area is culturally significant to many groups of Indigenous People. I strongly recommend consulting with all tribes that might have used these lands historically (or whose homelands included these areas) about any activities potentially affecting springs or wetlands.

Junction Creek Road/Logchutes Uplands Geographic Area

Permitted Winter Grooming

Junction Creek Road passes through important winter elk habitat and an increase in motorized vehicle activity will likely have a negative impact on ungulates and other species of wildlife.

Slow moving non-mechanized forms and fast moving motorized forms of winter travel/recreation are not compatible. Other groomed trails (e.g. Durango Nordic Center and Vallecito Nordic Ski Club) in the Durango area do not allow motorized vehicles or fat tire bikes because these activities are not compatible with skiing and snowshoeing.

Much of Junction Creek Road has a south aspect and the quality of snow for winter recreational uses often deteriorates rapidly due to solar radiation. In recent drought years there have been long periods when there has not been enough snow on sections of the road to support recreational activities. This trend will likely continue during times of climate change. Allowing snowmobiles on a groomed surface will accelerate degradation of the snow to the point the road becomes unsuitable for most users until fresh snow falls.

Motorized vehicle use on the road early in the winter prior to road closure can cause road damage and is not compatible with most recreational activities.

Currently most winter recreational users park near seasonal gate on Junction Creek Road. Parking at this location is limited and often it is difficult to turn around, particularly when conditions are icy. I suggest improving parking at the seasonal gate or eliminating parking at the gate altogether and providing parking for all winter users at the lower parking area.

Junction Creek Road is one of the best places close to Durango for winter recreational activities. Whenever there is snow many people walk, snowshoe, ski, and ride bikes on the road. There are many other opportunities for motorized winter activities in SJNF and I do not see a need for grooming Junction Creek Road. I am in favor of changing the seasonal closure date of the lower gate on Junction Creek Road from December 31 to December 1.

Road Upgrade

Paving Junction Creek Road will likely lead to increases in volumes of motorized traffic, negatively impacting ungulates and other species of wildlife. Most motorized and non-motorized vehicles would travel at higher speeds on a paved road, leading to an uptick in potential vehicle/biker collisions between vehicles.

Distributing parking among trail access points is a high priority, therefore I recommend chip sealing the section of Junction Creek Road from the lower to upper parking lots to better accommodate high levels of traffic and reduce dust and wash boarding. I am not in favor of paving the section of the road between the upper parking lot and Animas Overlook.

Designate Downhill Mountain Bike Trail(s)

Access to the outdoors is one of the primary reasons many of us choose to live in southwest Colorado and there are over 300 miles of trails within 30 minutes of downtown (Durango Trails website).

The proposed downhill mountain bike trail shown on maps in the J-FIRM scoping document passes through important wildlife habitat and an increase in non-motorized vehicle activity will likely have a negative impact on ungulates and other species of wildlife in this area.

Unfortunately many of the existing trails in the Durango area, including some in the J-FIRM project area, are in poor condition due to heavy use or because people ride bikes when trails are wet. I recently spoke with a friend who is an avid mountain bike rider and she said she will not ride some of the trails close to Durango because of their poor condition. I encourage SJNF and the Durango recreation community to invest more time and energy in maintaining existing trails rather than constructing new trails.

The J-FIRM scoping document proposes adopting or creating two downhill mountain bike trails in the Logchutes area. The scoping document's map of the Junction Creek Road/Logchutes Uplands Geographic Area shows two disconnected sections of "Potential Mountain Bike Trail". Are these two sections considered to be one trail? Please clarify and provide a map clearly showing existing trails and proposed trail alignments.

The J-FIRM scoping document proposes a 400 foot wide downhill mountain bike trail. This is an incredibly wide trail, approximately equivalent to a six lane interstate highway. Some of the comments infer the proposed trail is actually as many as four parallel trails. Please clarify and provide more information.

I oppose construction of new bike trails in the Junction Creek Road/Logchutes Uplands Geographic Area.

Springs and wetlands

Riparian and wetland ecosystems associated with streams, springs, and other water sources are an important part of the LRMP's sustainable ecosystems strategy. These ecosystems are small in extent, but represent a very important ecological component of the SJNF. Riparian zones of the southwestern U.S. contain the greatest diversity of native vegetation communities, birds, fish, and terrestrial vertebrates (SJNF LRMP 2021). Additionally, springs, seeps, small ponds, and small wetlands are identified as habitats most at risk due to climate change in *Climate Change Trends and Management Strategy for the San Juan National Forest* (2021).

I support management actions intended to *provide effective big game winter range and elk production areas*, however particularly when addressing springs, wetlands, and other water dependent ecosystems I suggest the SJNF planning prioritize diversity of all plant and animal communities and species consistent with the overall multiple-use objectives of the planning area throughout the planning process (Regulation 36 CFR 219.26).

Numerous springs and wetlands occur in the Junction Creek Road/Logchutes Uplands Geographic Area, providing a unique and valuable opportunity to restore and improve the composition, structure, and ecosystem function of the area.

The Colorado's CWCB/DWR Decision Support System database contains thirteen springs in the Junction Creek Road/Logchutes Uplands Geographic Area. These springs are on grazing allotments that have since been retired, and currently SJNF holds decreed water rights for all of them. In 2022, I visited these springs as well as a number of undocumented water sources in the Junction Creek Road/Log Chutes Uplands Geographic Area (Table 1). Other discrete water sources identified include two springs and four small impoundments. Slope wetlands not directly associated with springs were observed in many locations in the Junction Creek Road/Logchutes Uplands Geographic Area. It was notable that in Spring and Fall 2022 eight of the SJNF springs were dry. There was flowing or ponded water throughout the year at four of the undocumented water sources. Slope wetlands not directly associated with springs were observed in many locations in the Junction Creek Road/Logchutes Uplands Geographic Area.

I suggest SJNF inventory and assess all springs and wetlands in the Junction Creek Road/Log Chutes Uplands Geographic Area. These surveys should include discrete water sources such as springs and impoundments as well as slope wetlands. Legacy grazing has impacted slope wetlands and caused channel incision in some locations. Headwater slope wetlands are significant because of the role they play in influencing delivery of water to downslope environments and users. Information obtained from these surveys will document status and condition of water sources in the Junction Creek Road/Log Chutes Uplands Geographic Area, and should be used to identify and rank restoration potential for each site, based on criteria benefiting species diversity for both flora and fauna. A list of resources for methods including ecological condition, habitat quality, and biodiversity significance is provided below.

I oppose proposed activities including silt cleaning, compaction, or lining because not only would they be expensive and impactful on the landscape, they would have the negative effect of reducing groundwater infiltration necessary to support a diverse composition of desirable native hydrophytic plants or species of insects, amphibians, birds, and mammals dependent on wetlands and riparian areas. Developed tanks are not requisite for ungulates.

In many cases the best strategy for managing or restoring springs and wetlands is to conserve and protect what already exists. I encourage following low-cost or hands-off approaches to restoring springs and wetlands whenever possible. Often removal of invasive plants, and planting appropriate native species is all that is necessary. Restoration plans should account for a changing climate, and utilize a site-specific climate adaptation approach to plan for anticipated changes, with the goal of sustaining wetland functions over the long term.

I recommend establishing a 300 foot buffer around all springs and wetlands in the Junction Creek Road/Logchutes Uplands Geographic Area. Project activities should not be allowed within this buffer, and trails should be realigned where necessary. For example, a social trail at one of the undocumented springs passes through the spring area and wetlands not once but twice.

Table 1. Water Sources in the Junction Creek Road/Logchutes Uplands Geographic Area.

Name	WDID	Latitude	Longitude	Developed	Water Present in 2022	Notes
Springs – SJNF Decreed Water Rights						
BARNES SPRING #3	3010002	37.375	-107.904	Yes	Yes	Spring flow into impoundment formed by earthen berm
BARNES SPRING #4	3010003	37.372	-107.908	Yes	No	Earthen berm
BRUSH SPRING	3010004	37.372	-107.908	Yes	Yes	Spring flow from pipe into metal tank
QUINN CANYON SPRING	3010014	37.356	-107.920	Yes	No	Spring flow from pipe into metal tank (DWR says undeveloped)
QUINN SPRING #2	3010015	37.349	-107.924	Yes	No	Earthen berm
FLAG PARK SPRING	3010008	37.357	-107.883	Yes	No	Spring flow from pipe into impoundment formed by earthen berm
MUD SPRING-BARNES MOUNTAIN #1	3010011	37.359	-107.890	Yes	No	Spring flow from pipe into metal tank
MUD SPRING-BARNES MOUNTAIN #2	3010012	37.357	-107.889	Yes	No	Spring flow from pipe into metal tank
SPRING #4	3010019	37.358	-107.892	No	No	Hillslope
NO. 9 SPRING	3010013	37.351	-107.901	No	Yes	Spring flow into impoundment formed by earthen berm
LOG CHUTE SPRING	3010010	37.345	-107.902	Yes	No	Earthen berm
RIM SPRING	3010016	37.343	-107.905	No	Yes	
DEAD DOG SPRING	3010007	37.339	-107.884	No	Yes	Dug well
Undocumented Water Sources						
SPRING 01	-	37.338	-107.885	No	Yes	Trail through spring
SPRING 02	-	37.338	-107.881	No	Yes	
TANK 01	-	37.358	-107.888	Yes	Yes	Impoundment formed by earthen berm
TANK 02	-	37.355	-107.896	Yes	Yes	Impoundment formed by earthen berm
TANK 03	-	37.352	-107.898	Yes	Yes	Impoundment formed by earthen berm
TANK 04	-	37.350	-107.898	Yes	Yes	Impoundment formed by earthen berm

Colorado Trail/Junction Creek Riparian Corridor Geographic Area

Trailhead(s) Upgrade

- I support expansion of both the lower and upper parking lots, however I have concerns about impact of a larger lower parking lot on the Junction Creek floodplain. Please provide more information about plans for expansion of both parking lots.
- The restroom at the lower parking area should definitely be moved out of the floodplain. Please provide more information about plans for relocation. I also support construction of a restroom at the upper parking lot.

Add ADA Opportunities

I am in favor of providing access to the outdoors to everyone, however I have concerns about whether the first 1.12 miles of the Colorado Trail along Junction Creek is an appropriate place for ADA access. Portions of this section of the Colorado Trail currently do not meet ADA requirements for slope and width (Snodgrass 2015). Bringing the existing trail into compliance will require substantial realignment including alteration to slopes and the stream bank.

The Colorado Trail is popular with hikers, cyclists, and others. Many of the cyclists enjoy riding at high rates of speed. Construction of a paved trail will result in higher speeds of travel by bike riders. Additionally, visibility is limited in many sections of the trail. It is easy for me to step aside when a bike rider comes down the trail, but the combination of poor visibility and fast moving bikes increases the probability of collisions between bike riders and people in wheelchairs.

I support upgrading the section of the Colorado Trail between the lower parking lot and the bridge crossing the Sites Ditch to ADA Standards. I am opposed to reconstructing the section of trail between Sites Ditch and the upper parking lot to ADA Standards.

Streambank Rehabilitation

- I support stabilizing the numerous bare and/or actively eroding areas along the Junction Creek stream bank and in the floodplain by strategic placement of boulders or rock, vegetation re-establishment, and other site-specific best management practices.
- The installation of educational signage with information including stream ecology and riparian ecosystems may help focus activity in designated areas.
- The Colorado Natural Heritage Program gave Junction Creek a 'Very High Biodiversity' ranking based on the presence of a globally imperiled box elder/narrowleaf cottonwood/red osier dogwood plant community (CNHP 2004). The stream and riparian ecosystem are in healthy functioning condition and changes such as bank armoring and installation of fish structures are unnecessary and would be costly.

Falls Creek/Hidden Valley Geographic Area

Steineger Ditch and Falls Creek Wetland Maintenance

Wetlands in the Falls Creek/Hidden Valley Geographic Area are dominated by cattails and support limited species diversity. I encourage SJNF to develop strategies to increase floral and faunal diversity, with a focus on providing habitat for northern leopard frogs, songbirds, and waterfowl.

Falls Creek

The reach of Falls Creek downstream from the SJNF boundary near Turner Reservoir is not mentioned in the J-FIRM scoping document, however this stream has high recreational and ecological value, and I recommend it should be included.

Flows in Falls Creek below Turner Reservoir are highly regulated, but the stream provides fish habitat and currently a small population of trout exists there. Additionally, Falls Creek supports a globally imperiled plant community consisting of narrowleaf cottonwood/strawleaf willow/silver buffaloberry, ranked in fair condition by the Colorado Natural Heritage Program (2004). This riparian community provides important habitat to migratory bird species and other wildlife.

Downstream from Hidden Valley, Falls Creek passes through Falls Creek Canyon. In this reach recreational activities have resulted in numerous bare and/or actively eroding areas along the stream bank and in the floodplain.

I recommend SJNF complete riparian and aquatic assessments of the reach of Falls Creek within the Falls Creek/Hidden Valley Geographic Area with a focus on developing plans for stream bank rehabilitation and habitat improvement.

Authorization of Emergency Egress Route

I support permitted use of Forest System Road #065 for occasional maintenance and emergency egress uses only. I request access to this egress is also available to residents of the Hidden Valley, Turtle Lake neighborhoods and other neighborhoods that might be trapped in a wildfire emergency.

Thank you for considering my comments. I look forward to participating in future discussions about the J-Firm project.

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