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Comments emailed and electronically submitted via comment portal at:
<https://www.fs.usda.gov/project/?project=61809>

Pagosa Ranger District
San Juan National Forest
Attn: Jackson Mountain project # 61809
P.O. Box 310
Pagosa Springs, CO 81147

Re: Scoping for Jackson Mountain Trails and Hard Rock Gravel Mine project # 61809

The International Mountain Bicycling Association (IMBA) provides the following scoping comments for the proposed mountain bike trails system and the recent addition of a proposed hard rock gravel mine pit on the Jackson Mountain landscape.

IMBA would like to thank the USFS and its staff in the Pagosa Ranger District (PRD) of the San Juan National Forest for the work that has gone into the current proposed trails concept plan. We offer these comments in the spirit of constructive feedback and a collective desire for well managed public lands and world class, close-to-home trails. We do not want to assume anything in this planning process relating to the gravel mine portion and we believe the scoping period is an opportunity to ask questions and seek answers through the following steps of the NEPA process. Therefore, while we have concerns, our comments, recommendations, and questions posed below are in the spirit of posing ideas and seeking answers to them to ensure the process is well informed and outcome is manageable.

BACKGROUND

IMBA's interest in the Jackson Mountain landscape began with the proposed trail system. It revolves around our direct involvement in the proposed trail design which meets our organizational focus on more-trails-close-to-home. Our *Trail Solutions* team has been working with the PRD on the design since summer of 2021 with funding from the USFS by way of staff time investment, Archuleta County investments, City of Pagosa Springs investments, and local foundation grants that came through the local advocacy group DUST2. IMBA seeks to help create well designed trail systems across Colorado and the country to negate the negative impacts of unmanaged recreation on trails that are not designed with environmental sustainability in mind and can often lead to user and wildlife safety problems, poor user experiences, soil erosion and water quality issues. We believe our designs can not only protect the local environment and wildlife that reside there, but can help enhance agency management objectives while providing a world class recreational opportunity for the local community to enjoy. Therefore, we are pleased to see that the USFS agrees and has indicated that "A well designed, sustainable, multi-use trail

system in the Jackson Mountain area can support and enhance landscape resilience and provide for recreation opportunities.” It is important to note that the proposed trails have also been designed with the wildlife data in mind. Since the area is under a layer of snow in the winter, the trails will not be used and will not be affecting the elk range that some proposed trails overlap. The proposed trails have also been vetted with the Adaptive Silviculture for Climate Change (ASCC) project which remains part of the planning process for the vegetation management efforts that are being proposed. In some instances our trail design team has discussed with agency staff pros and cons of adjusting trails to utilize the temp veg. management roads and to later convert those sections into trail once the veg project is complete. Numerous joint management and coordination of management examples exist between the USFS staff and other partners to ensure this trail plan is as effective and sustainable as possible. The only exception is the introduction of the mine within the trail planning area.

As of late, our interest in this area also relates to the recent proposed addition by Archuleta County to establish a “non-commercial” open pit gravel mine adjacent to and within the proposed trail system to serve local road maintenance needs. During 2022, IMBA’s *Trail Solutions* team became aware of a potential open pit gravel mine proposal that overlapped with the proposed trail system. Our team made necessary adjustments to the proposed trail alignments to conceptually accommodate this concurrent mine proposal.

During that process we learned that other possible proposed locations for the gravel mine had been considered by the USFS and/or Archuleta County. We believe the potential for negative (if approved) impacts to the trails system could be significant. The USFS and our local partners have spent years working with us and through the proper federal processes to design and vet the sanctioned trail proposal with federal and state wildlife agencies to ensure the trails are sustainably designed and aligned in a manner that works with other public land stakeholders. Local and federal grant dollars went into the planning and therefore we are concerned with the addition of this mine proposal.

We are also concerned about the potential waste of these public tax dollars and local foundation grants that have gone into the planning and development of the proposed mountain bike trail system if the proposed mine potentially and irreparably damages the outcomes of the proposed trails. If the mine is approved, it could potentially render this planning and investment worthless if the mine were to become the dominant use of the landscape due to its direct and indirect footprint and greater associated impacts. We want the USFS to explore options to host the mine elsewhere not adjacent to and within a proposed trail system. We would like to understand what other locations were considered for this gravel mine project and why they were possibly dismissed in favor of this location?

Lastly, we are pleased to see that the PRD has stated that the public can comment on the different proposed actions independently. But this is still not well known enough to ensure that the public does not feel compelled to make a choice of “all in support” or “all opposed” because all three projects are lumped into one proposal. The EA should make clear that comments can be specific to each project.

GENERAL

Purpose and Need and Range of Alternatives

The EA is the next stage of the NEPA process which will be informed by the comments generated through the scoping period. We believe there needs to be two or more independent purpose and need statements in the EA that keeps the proposed gravel mine separate from the proposed trail system but also looks to analyze the effects of the combination of these two uses on the same landscape. They should be analyzed upon their individual merits but with the recognition that the trail system has little effect on the

non-commercial operation of the mine yet conversely the mine would potentially have a substantial impact on the viability of the experience and safety of a community recreational trail system as proposed here.

The EAs range of alternatives needs to include a no-action alternative for the mine just as it would be fair to do that for the trail system. It should also include alternative site locations for the mine and explain any reasons if those are not advanced forward for further consideration. The proposed trail system has been in planning at Jackson Mountain for a couple of years so this is the location for that asset. Our recommendation would be to include a viable alternative for the mine to be located elsewhere. As we understand it, this mine proposal was derived from a Archuleta County stated desire for a locally sourced gravel pit. However, while we are not suggesting this is the case, Archuleta County, should not dictate the location of the mine. The PRD should be providing for viable sites where its implementation would not be in conflict with or degrade other forest uses or impact nearby resources or residents. We are not saying that any of these are factual yet, but rather the EA must analyze these factors. NEPA requires a reasonable range of alternatives be analyzed and public comments collected concerning the review of alternative uses of available resources. For a project proposal that has significant long lasting environmental impacts that are not location-dependent (could be located elsewhere), that range must include alternative locations for consideration and public review.

GENERAL

Previous Public Comment

We understand that public open houses were held in the spring of 2022 in order to publicly share project information to gather initial feedback. These initial comments have been captured in the “Jackson Mountain Landscape Project Summary of Concerns/Comments/Questions as of Nov. 14, 2022” document which is provided as a summary of the comments received from the public, partners, and stakeholders. It is important to note, these comments were collected outside of this NEPA process. Importantly, these comments do not include the proposal for an open pit gravel mine and the comments are therefore theoretically or at least possibly skewed by that critical missing component. While more commenters supported the trail system than opposed it, it is entirely possible that some commentators might have completely changed their comments with the new information of the mine factoring into the equation. For instance, while some commenters were opposed to the trail system or to bikes on the proposed trails, it is not unreasonable to think that some people might, given the need to make a choice, instead prefer to have the trails or to allow bikes on the trails instead of the mine and may in fact prefer the trails or the bikes over the mine. Some may see supporting the trails broadly as a unification against the mine. But these influences are unknown prior to this current comment period. The initial comments were instead collected in somewhat of a vacuum without juxtaposition of the proposed mine and its impacts and how that influences people's opinion. I think the USFS should question the value of the early comments because of this and limit the reliance on them or reference to them. They are merely anecdotal evidence that the majority of commenters supported the trail system development at that point in time. It appears that with the formulation of some new local advocacy groups in opposition of the mine, there are more people and entities coming out in support of the trail system than before.

MINE DISCUSSION

Climate change will have a significant effect on public lands and waters, but these same public lands will also play a critical role in solving climate change. Addressing climate change means ensuring a future

with clean air and water, protected land, renewable energy, and economic growth. Recreation, while having its own impacts, is seen as a far more sustainable and infinitely renewable resource on public lands where only experiences are extracted in virtual perpetuity. Mineral and resource extraction is a non-renewable resource and rarely includes a boost in tourism and long term sustained economic growth. Securing permission and funding for public land trails, such as the proposal here at Jackson Mountain is a difficult venture and costs are going up every year. As mentioned above there has been significant investment to date for this conceptual trails plan using both private and public funds. Trail development has a successful track record of spurring economic growth as it has proven to do in Archuleta County. It therefore makes sense to encourage sustainable trail development and ensure that potentially non-compatible uses, such as the proposed mine are separated to allow for the USFS to actively and adequately manage a community trail system asset for success.

Therefore, it may be unwise as well as wasteful of public dollars to design a trail system one year (2021-2022) only to consider authorizing an potentially incompatible activity that could destroy the viability of the trail system the next year (2023) or negatively impact the trail experience by allowing detrimental activities like mining immediately adjacent to the trail network.

MINE DISCUSSION

Mine Buffer

The proposed location for the gravel mine is not currently an industrial site. In fact, it is a remarkably scenic talus field location that is a geological natural wonder. It will, however, become an industrial zone if an open pit gravel mine were in operation removing the talus that exists naturally on the surface.



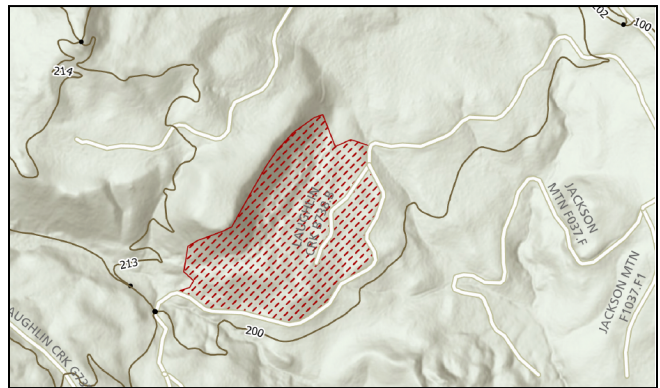
Instead of forever altering and quite literally removing what makes this place special, the PRD should consider and reveal for review any alternative mine sites and add those into the proposed alternatives for further public discussion. Currently, having only one location when others may exist is possibly an insufficient range of alternatives and future violation of NEPA.

In the EA, the PRD should also consider and review a mine-to-trail buffer to minimize the effects of the proposed mine on local residents and the proposed trail system. Buffer zones are meant to minimize adverse impacts of an activity to human health and well being. The PRD must articulate the impacts presented by the mine and how a buffer could be adequate in mitigating them. In Salida, CO, in 2021, the BLM proposed a 30ft buffer to separate a trail from a proposed quarry expansion. The photo below shows the effect of a 30ft buffer which is far too close in proximity to the example trail to be an effective buffer. That distance was seen as wholly inadequate and, if considered here, must be substantially greater to be effective. Having a mine in close proximity to a trail system, even if separated by slope angles that

minimize visual access would still be an eyesore as it would necessitate fencing to provide safety and therefore would destroy the natural environment setting a trail system would be designed to retain. Often another proposed solution is to build an earthen berm to separate such an activity but this also leads to intense environmental impacts and increases the space needed to buffer the industrial activity from the public. All reasonable efforts should be made to mitigate the known effects of the mine on the proposed trail experience within the EA so that the public can assess and understand the options presented.



The most immediately adjacent trail proposed to the mine quarry would be trail segment TR200 which lies to the south boundary. Trail segment TR200 (shown in adjacent image) is a crucial collector for trails along the southern edge of the site, and it creates a southeast limit/boundary for the largest Perimeter Loop. If the gravel mine development were approved, this trail is the lowest parallel collector and could function as a main connector while the road above is used for hauling rock. This trail would be an essential safety alternative to the road. Current trail alignment should provide



adequate vegetation screens from the road above. Near the western terminus there is a wetland crossing that may also help to screen/protect the trail from quarry workings up slope but more research information is needed to ensure this is a safe alignment. If quarry development occurs, expect some needed adjustments at the trail junction with TR100 as roads above can be expected to shift downslope for better haul capacity and functionality.

While we understand the basic desire of the county to source road maintenance material locally, we are unsure how this will be compatible with a safe, pleasant, quiet, and natural trail experience. We look forward to seeing the USFS analysis that will vet all issues with this mine to ensure preexisting goals of the proposed trail system can still be met or exceeded.

We believe the sounds of heavy machinery and the dust and pollution from the mining operation could have a significant impact on the quality of life for those living in the area and recreating on these trails. We are concerned about the safety of the access roads 37 and 738 that the mine is said to utilize. We have heard that there will be an estimated 25 trucks a day every weekday for years to come hauling gravel out of the mine on these roads. Is that accurate? The EA must divulge this information and analyze it. Would all mineral exports be for local road maintenance? Will the USFS solidify the estimations in the EA of the extent of the resource extraction and demonstrate the need for local “non-commercial” use? Assuming the gravel will not all be used as it is extracted and therefore will be stockpiled for later use, will the gravel be stored on site or off site? Could the storage of the gravel be kept onsite to minimize constant transport and

only moved when needed for local road projects?

Sharing public trailhead access roads with near constant gravel trucks entering and exiting the mine could potentially endanger lives and at the least detract from the experience enough to discourage continued use. The additional heavy use of this road with busy mining traffic could pose a significant safety risk to cyclists, hikers, and other trail users. It is said that these access roads were already a concern for the proposed trail system and trailhead. Having the PRD add in heavy industrial truck traffic, self-imposed, seems only to exacerbate that concern.

MINE DISCUSSION

The open pit gravel mine would have a significant and lasting impact on this area, and we believe that it is important to carefully consider all of the potential environmental consequences before moving forward with this project.

Tangential Impacts

Noise, aesthetics, and proliferation of fugitive dust are some of the most important factors to mitigate with a mine once it moves significantly onto the public land estate. The EA must discuss the mitigation of fugitive dust from both a regional macro scale perspective for the overall air quality of the community and the intent of the mine operator to halt activities in high wind events, and the micro scale as it pertains to the close proximity of the public using an immediately adjacent trail network. The goal of mitigating proliferation of fugitive dust should be to ensure that airborne emissions of particulates originating and sourced from the quarry activities should be neither at unhealthy levels, nor substantially greater than that produced by natural activities or riding activities on the trails themselves. Fugitive dust emissions can and will contain any number of toxic substances that naturally occur in the local deposits yet are quarantined in their undisturbed state. While general mitigation measures may be sufficient for regional air quality goals when environmental dilution is factored in via broad macro-scale application and measurement, these efforts may not be sufficient to protect the micro scale of trail users in close proximity to the mine. These substances may not pose public health risks when undisturbed but when exposed and released into the environment via wind or water, may cause significant hazards. This could include but is not limited to carcinogenic substances like mercury, arsenic, lead, various salts and silica dust and cadmium that enter the atmosphere through the dust generated by the daily mining activities¹ and are known to cause detrimental health effects such as cancer, asthma, birth defects, etc. Cumulatively, this can be substantial and can cause adverse health and further exacerbate environmental conditions. Additionally the emission from heavy machinery needed for mining activities should also be considered, regulated and mitigated. Requiring mining operators to have all excavation and transportation vehicles as well as all on-site processing machinery to meet best available technology for low emissions is also important once proponents propose to move operations onto public lands for long term permitted use. The onus is on the USFS to dictate the stipulations for how those operations will be environmentally conducted to protect all the natural resources and multi-use visitors of the USFS lands and adjacent community residents.

Again, according to NEPA and the USFSs own handbook, the PRD must consider how its land use allocations and decisions will have a downstream effect on other legitimate public land users.

According to the USFS, “Air pollutants affecting our National Forests can be divided into two groups: primary and secondary pollutants. Primary pollutants from deposition come directly from sources such as industrial facilities [like the proposed mine]...” “Secondary pollutants, such as ozone, are formed when

¹ https://www.akaction.org/wp-content/uploads/2015/07/Mining_and_Toxic_Metals.pdf

primary pollutants undergo chemical reactions in the atmosphere. Most pollutants can be transported great distances from their source to impact distant lands.”²

MINE DISCUSSION

Stipulations and Compliance

In the EA the PRD must review and reveal the potential mine contractor’s mine procedures to qualify them under public land standards. A review of their records or operation methods in the EA must look into adherence to best practices. Has the operator ever been cited or failed to comply with environmental regulations? Can the PRD assure the public that operations will be carried out to a lawful standard that meets regulatory requirements? The EA should describe the stipulations that the PRD would place on the mine operators or a review of their track record of operation and reclamation. The public has a right to review these elements and comment on them in the next phase of NEPA.

TRAIL PLAN

IMBA Support for Trail Proposal

Unsanctioned trail use has existed for many years at Jackson Mountain. However, while they were not system trails, they were also not illegal trails or illegal use of them as the USFS had a policy allowing for cross-country (off system trail) use. Today, a professional concept trail plan has been crafted by IMBA and proposed in this plan that would bring unmanaged recreation into compliance and provide a much higher quality experience for local residents and tourists alike while minimizing negative impacts to local wildlife and natural resources of the area. For this reason, IMBA stands by and supports the conceptual plan for the proposed trail system at the Jackson Mtn Project landscape and we hope to defend it on behalf of the local community and advocacy group that helped commission the plan.



IMBA’s *Trail Solutions* has literally written the books on trail planning, managing mountain bikes and how to manage for experience. Therefore our conceptual plan meets those best practices. Our trail proposals do not just pack in the most miles a landscape can hold, rather they take into careful account the topography, the local habitat and fauna, the soils and the regional offerings to create a trail system that serves the local needs while providing for a quality experience for all. Depending upon local agency manager desires and stipulations, the majority of IMBA’s trail concept plans also involve trails that serve hikers and equestrians often leading to some trails only open for these other diverse uses.

Importantly, the proposed trails were informed by and designed in part through direct conversations with USFS, the Adaptive Silviculture for Climate Change (ASCC) project, and with City and County input, and DUST2. The zonal approach to the Jackson Mtn landscape helps balance the recreational experiences the trail system offers by balancing the level of trail congestion, matched with the typical skill levels of the users. Beginner trails will typically be more front-country located while backcountry trails will serve those trail users seeking more solitude with advanced skills to match as these trails are typically more rugged. These proposed trails also take into account the interests of hikers and potentially equestrians and provide alternatives for hikers seeking to avoid MTB-specific descending trails and/or exit the trail

² https://www.fs.usda.gov/air/air_pollution.htm

system for shorter hikes, and equestrians seeking more backcountry (less congested) zones. Sadly, the proposed mine was such a late addition to the planning that we have only had minimal and rudimentary opportunities to adjust the trails to accommodate this highly impactful and unnatural project within a proposed natural recreational trail zone. This addition to the project proposal may be incompatible with the proposed trail plan and needs to be well vetted to determine if and how.

In 2018, the BLM completed a collaborative effort to develop “**Guidelines for a Quality Trail Experience** (GQTE)”. The BLM guidelines aimed to help improve the design, construction, and management of mountain bike trails all across the country. This resource was developed in collaboration with IMBA. The USFS has utilized this resource as well and we would recommend that the PRD review this valuable resource and apply the concepts to the Jackson Mtn landscape. Throughout this GQTE document, numerous sections discuss the value of trail experiences and in doing so go beyond just the features but include the location of the trail as an integral part in meeting the desired outcomes of the recreating public. The setting is important. This is not just a BLM issue, this should also be a USFS goal. Those desired outcomes are a tangible set of experienced-based benefits that take in the total experience of the trail setting, design, and management. Again, the Jackson Mountain Project EA must compare how the proposed mine could affect this outcome and include alternatives to consider.

IMBA recommends that the USFS move away from what appears to be an activity-based management approach and more towards an experience/benefits-based model for managing recreation. Simply stated, the former activity-based model is similar to setting a goal of ten trails and once ten trails are available the goal is considered accomplished. An experience/benefits-based model, on the other hand, looks more at whether the ten trails are providing the desired and intended experiential outcomes for the visitor and judges its success upon maximizing these attributes. The intended result is a collectively more satisfying experience and one that will yield greater sustainability. Sacrificing experiential elements of this model disrupts the formula such that it no longer functions as a whole and can’t deliver on the intended outcomes. Therefore, proposing a mine within a previously proposed and invested in trail network might degrade the setting of the trail system by forcing either a subpar reroute, or by placing an incompatible activity in close proximity to the trails for the next 50 plus years. This could jeopardize the investments made in the trail designs just a year or two ago. This is all to say that trail experiences are influenced by their surroundings, their settings, and their location as much as they are by their specific tread features and layout. If the PRD were to choose to move forward with the proposed mine located within a trail system at Jackson Mtn that forces a subpar and possibly unsustainable set of reroutes or experiences, or is set in close proximity to the trails where the mine becomes an unavoidable presence in both an auditory and/or visible sense, then the trail experience could be disrupted and damaged to such an extent that it leads to an effective loss of recreational access to that location.

As it relates to the 40-mile trail proposal and what some may feel is too much trail, we believe there are numerous ways to implement a trail system that will serve the local community and draw in visitors for years to come. Phasing the construction of the trail system through state and local grants over the course of a set of years could be a mechanism for spreading out the construction phase. Establishing a local cost share agreement for volunteer maintenance or a concessionaire agreement may also serve to spread out responsibility of management and upkeep. Regardless of the creative ways in which to implement the proposed trails project, establishing a well designed and sizable trail system will be necessary to meet current and future demand and simultaneously stave off any illegal trail use/creation on sight or elsewhere in the PRD.

Conclusion

IMBA looks forward to a robust and thorough EA that will provide analysis of the trail system and the

gravel mine independently yet with an understanding of how they might interact should they each be placed on the same landscape. Thank you for considering our comments and recommendations. Please feel free to reach out to me if you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read 'A. Clark', with a long horizontal flourish extending to the right.

Aaron Clark
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