

February 23, 2023

Joshua Peck
District Ranger
Pagosa Ranger District
San Juan National Forest
PO Box 310
Pagosa Springs CO 81147



Re Jackson Mountain project
Transmitted via portal

Dear District Ranger Peck:

Colorado Wildlife Federation (CWF) appreciates the opportunity to provide comments at this scoping stage of the Jackson Mountain project. CWF favors landscape level planning for our public lands that strives to balance wildlife conservation and outdoor recreation. Our members and supporters are anglers, hunters, wildlife viewers, and others who care about conservation of important wildlife habitats on public lands.

In its scoping letter the Pagosa Ranger District (District) refers to the “hub of activity” in the Jackson Mountain area, noting recreation and vegetation treatments. The District has proceeded to identify proposals for additional trail system development, fuels treatment, vegetation management and gravel pit development. Absent in the proposal to construct 44 additional miles of mountain bike and multi-use trails is any acknowledgement of the adverse impacts to areas mapped by Colorado Parks and Wildlife (CPW) as High Priority Habitat: the E-31 elk herd winter concentration area and severe winter range. *And several of the existing trails and the proposed trails also are within the elk and deer migration corridor that CPW has identified.* The adverse impacts to elk and deer include disruption of their activity in nutritious habitat, resulting in their movement into lesser quality vegetation areas and consumption of energy needed in winter for health and survival.

In elk severe winter range and winter concentration areas CPW recommends in its High Priority Habitat document the prohibition of human activities from December 1 through April 30. In addition, for elk and deer migration corridors, elk winter concentration areas and severe winter range, CPW recommends that surface density be limited to less than one linear mile of routes per square mile for the habitat to function effectively. If proposed or existing trails are within or overlap an elk production area, CPW recommends that human activities be prohibited from May 15 to June 30.

It does not appear that the District has considered impacts to the High Priority Habitat in the Jackson Mountain area.

We note the Memorandum of Understanding (MOU) between the State and the U.S. Department of Agriculture provides in VI this shared priority: Goal 1. “Ecological restoration...” Protecting and enhancing wildlife habitat and wildlife corridors.” Also Goal 5 states, Conserve and protect fish and wildlife, states “...Our work will include coordinating with local, state, and federal land managers – and across administrative boundaries – on a landscape-level to maintain, protect, and enhance wildlife corridors and habitat connectivity.” The MOU further provides that the parties shall work together to develop and manage outdoor recreation while protecting natural resources and wildlife.

The San Juan National Forest Land and Resource Management Plan (2013, updated 2021) Desired Condition 2.3.22 specifies, “Elk: Management activities and human disturbance levels (especially in severe winter range, winter concentration areas, and calving ground) provide effective habitat capable of meeting state population objectives.” And see Guidelines 2.3.60, .62, .63 and .66. The Plan also includes monitoring requirements under the 2012 planning rule (ii “ the status of select ecological conditions including key characteristics of terrestrial and aquatic systems.”).

In the Data Analysis Unit (DAU) San Juan Basin Elk Herd Management Plan for the E-31 herd (San Juan Basin), approved by the Colorado Parks and Wildlife Commission in September 2020, CPW noted “cumulative and prolonged impacts of development and recreation disrupting migration and decreasing quality and quantity of habitat. Actions to enhance and protect important elk habitat will be essential to increase the elk population.” The E-31 elk herd has a low calf-cow ratio and the proposed additional miles of trail in their High Priority Habitat will exacerbate the problem. In the Plan, CPW has expressed its support for development of recreational areas outside of E-31 High Priority Habitat and the need to set aside areas of critical habitat from recreational use. CPW has made adjustment to hunting licenses in this herd’s geographic area and is researching tools to apply for the purpose of improving the low calf:cow ratio. As referenced above, the proposed plan would continue existence of trails and add trails in High Priority Habitat.

A body of peer-reviewed research studies offers to land managers approaches and tools to avoid or minimize impacts to big game when planning or assessing trails and other recreation proposals. Your agency’s Pacific Northwest Research Station in December 2020 published a comprehensive work titled, “Sustaining wildlife with recreation on public lands; a synthesis of research findings, management practices, and research needs.” Miller, Anna B. *et al.* See also, in the context of elk: Wisdom, M.J *et. al.*, 2018. Elk responses to trail-based recreation on public forests. *Forest Ecology and Management* 411:223-233; Naylor, L.M., M.J. Wisdom, and R.G. Anthony, 2009. Behavioral Response of North American Elk to Recreational Activity. *Journal of Wildlife Management* 73(3):328-338; Phillips, G.E. and A.W. Alldredge, 2000. Reproductive Success of Elk Following Disturbance by Humans During Calving Season. *Journal of Wildlife*

Management 64(2):521-530. See also Colorado's Guide to Planning Trails with Wildlife in Mind, an important resource published by CPW in 2021.

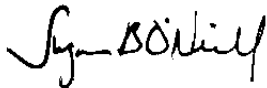
<https://cpw.state.co.us/aboutus/Pages/Planning-Trails-for-Wildlife.aspx>. It was developed through a process in which the US Forest Service and other partners participated.

In addition, we all know that a substantial number of the existing trails on Jackson Mountain were user-created. The proliferation of these unauthorized trails should not become a platform upon which to initiate or approve a project for constructing connecting trails. CWF urges the District (and USFS in general) to create disincentives rather than what amounts to unintended incentives for unauthorized trail building likely due to lack of enforcement capacity.

CWF asks the District to meet again very soon with CPW and the International Mountain Biking Association to craft much needed adjustments to the existing trail system and to the proposal that will avoid or minimize disruption to the E-31 elk herd's high priority habitat on Jackson Mountain.

Thank you for considering our comments on this very important matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Suzanne O'Neill".

Suzanne O'Neill
Executive Director
Colorado Wildlife Federation

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