



COLORADO
Parks and Wildlife
Department of Natural Resources

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July 29, 2024

Joshua Peck – District Ranger
Pagosa Ranger District - San Juan National Forest
P.O. Box 310
Pagosa Springs, CO 81147

RE: Jackson Mountain Landscape – Fuels Reduction and Vegetation Management Project

Dear Mr. Peck,

Colorado Parks and Wildlife (CPW) appreciates the opportunity to provide scoping comments to the Pagosa Ranger District of the San Juan National Forest (SJNF) regarding the Jackson Mountain Landscape – Fuels Reduction and Vegetation Management Project Environment Assessment (EA) within Archuleta County. The proposed action includes fuels reduction and vegetation treatments involving mastication, thinning, and tree removal.

CPW's statutory mission is to perpetuate the wildlife resources of the state, to provide a quality state parks system, and to provide enjoyable and sustainable outdoor recreation opportunities that educate and inspire current and future generations to serve as active stewards of Colorado's natural resources. This mission is implemented through our 2015 Strategic Plan¹ and the goals it embraces which are designed to make CPW a national leader in wildlife management, conservation, and sustainable outdoor recreation for current and future generations. Part of this implementation includes responding to agency requests for recommendations to avoid, minimize, and mitigate the impacts of various types of land use activities on the natural resources in Colorado.

CPW commends the Pagosa Ranger District for taking steps to improve forest health in a manner that reduces the likelihood of high intensity wildland fire and improves habitat for wildlife. CPW would like to provide the following recommendations to improve upon what is proposed in the EA.

The current proposed plan includes treatments that may remove fuels adjacent to open roads which create buffers that allow for wildland fire control options, increasing public and firefighter safety in the event of a wildfire. Vegetation adjacent to open roads provide a buffer for wildlife from human

¹ Colorado Parks and Wildlife 2015 Strategic Plan (November 2015)
<http://cpw.state.co.us/Documents/About/StrategicPlan/2015CPWStrategicPlan-11-19-15.pdf>



influence and reduce wildlife displacement caused by roads and trails. CPW recommends maintaining a mosaic of vegetation adjacent to roads to help reduce the impacts of roads and trails by providing a visual and sound buffer for wildlife. This would allow for increased wildland fire control, while still maintaining a security buffer for wildlife. This treatment prescription should be included in areas where a fire break is needed and preserved staggered clumps of vegetation can be set back from the road at greater distance in these areas where necessary.

The proposed action includes retaining certain vegetation types in treatment areas to promote age class diversity. CPW agrees these methods improve forest health as well as habitat availability for wildlife. In addition to this treatment, CPW recommends that pockets of dense understory remain in treatment areas to provide thermal cover and escape cover for wildlife. This prescription would improve wildlife utilization and density while still achieving the objectives of this plan.

Section 3.2.1 acknowledges that there currently is moderate to high use occurring on user-created trails in the Jackson Mountain area. CPW recommends that the Forest Service utilize this opportunity to obliterate these illegally created trails while resources are present and conducting work across the landscape. These illegal trail systems being allowed to exist on the landscape further incentivizes the creation of additional trails that are not properly analyzed for impacts.

Section 3.2.1 also acknowledges that CPW is currently updating the Species Activity Maps for the Southwest Region. These updates are done yearly on rotation through all four CPW regions with the Southwest Region currently in the mapping process, meaning that most wildlife layers have not been updated in four years in this area and data collected in that time frame will be applied to this update. This process reviews all publicly available datasets and updates these mapped habitats using the best available science. Included in these updates are the big game migration corridors. CPW currently uses a hybrid approach to mapping migration corridors which includes GPS-collar data and expert knowledge from decades of observations of CPW Area staff. Where GPS-collar location data is available, CPW uses the widely acceptable methodology of Brownian bridge movement models (BBMM) with a fixed motion variance to map deer and elk migration corridors. Recent analysis of GPS-collars has refined the elk and mule deer migration corridors in this ranger district showing the Jackson Mountain area being utilized heavily for migrating ungulates.

Thank you for the opportunity to comment on this Environment Assessment. If you have any questions concerning these comments, please feel free to contact District Wildlife Manager Doug Purcell at (970) 799-0843.

Sincerely,



Adrian Archuleta
Area Wildlife Manager - Area 15

CC: Southwest Regional File; Area 15 File; Southwest Deputy Region Manager-Matt Thorpe; Southwest Region Land Use Coordinator-Pete Foote.



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