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First name: Jim and Ann

Last name: Shepherdson

Organization:

Title:

Comments: We are former natural resource managers who used to work on the Pagosa Ranger District (Jim for almost 26 years and Ann for almost 17 years). We are familiar with the Jackson Mountain area and the Pagosa Ranger District in general.

#### NEED FOR THE PROJECT (Bike Trails portion)

As we understand, many of these trails were created by bike enthusiasts without authorization from the Forest Service. If that is the case it would seem that a process to phase in authorized trails should occur in a separate analysis.

But if these projects are to be included in this one analysis, we will address them as such.

#### TRAILS/WILDLIFE IMPACTS

Although, much of the proposed trail system lies outside of the wildlife winter concentration area and entirely outside of severe winter range, the proximity of this concentrated trail use will place stress on these animals (deer and elk) as they travel to and utilize these areas. Animals can be migrating to these wintering areas even when there is not much snow at the location, but could have been forced to the area due to heavier snow in higher country. Elk and deer tend to be very susceptible to pressure caused by human presence on foot, a bike, an ATV or horse back. People in vehicles don't cause as much stress to the animals. This additional human presence (pressure) could cause deer and elk to move onto and winter on adjacent and nearby private lands causing damage issues for the landowners and the Colorado Division of Parks and Wildlife. Trails on the northeast side of the Jackson Road could be minimized as well, one road open to vehicles should be sufficient, the new bike trails add to the disturbance to deer and elk from spring through fall. The existing road tying into the Snowball Road should be maintained with no new bike trails increasing impacts to deer, and other wildlife.

#### RANGE IMPACT

The initial analysis for the project fails to address that there is an active grazing allotment in the area. Will there be bike cattleguards in the fences where the mountain bikes cross the fences to maintain the rotational grazing system on the allotment? Are there plans to move the permittee to a different area? The increased stress on the livestock could easily lead to decreased weight gains for the permittee.

#### SOILS

There are soils within the project area that are highly unstable. Will there be mitigation measures in place to avoid long term impacts from the trails? If there are negative impacts how will the reclamation be paid for?

#### RECREATION

The existing and proposed trailhead/parking areas need to be isolated from the bike trails as mixing horses and bikes is a bad idea. The existing trailhead should be maintained for horses and hikers and the new parking area/trail head could be for bike users. The parking area/campground will have to be very carefully located to avoid conflicts.

## LAW ENFORCEMENT

If these trails were built without authorization what will prevent more unauthorized trails from being constructed?

## GRAVEL PIT

The gravel pit is the least impactful parts of this project and will cause much less disturbance to wildlife than the trail system will. The impacts from the gravel operation will be confined to the pit development and its access road. The time of use of the gravel pit will be only during the day and will not be impacting the wildlife 24/7 like the recreation use has the potential to do.

## FUELS AND VEGETATION TREATMENT

The fuels and vegetation sounds all well and good, however when viewed in combination with the trails proposed a lot of design would be necessary to help minimize the impacts to deer and elk. Having observed other fuel projects in the area, there seems to be a tendency to accomplish these on a broad scale with minimal wildlife habitat considerations. In my experience in working with vegetation management (particularly with Gambel oak) that when it is top-killed with either fire or mastication, it can sprout profusely and defeat some of the objective of reducing fire behavior that was desired. Our suggestion would be that it would be desirable to leave clumps of oak next to roads or trails. The larger diameter oak could be thinned moderately (to prevent sprouting) and blended into where mastication would occur. This will provide some cover/screening for wildlife from the trails and roads.