

Data Submitted (UTC 11): 2/23/2023 4:51:00 PM

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Comments: The focus of my comments on the Jackson Mountain Landscape Project is on trails and trail construction in a multi-use project area. While I deeply respect outdoor recreation and the opportunities we have here in Colorado, I am not in favor of this project. As a community member in Southwestern Colorado, I feel obligated to highlight concerns regarding the impacts this project will have from a wildlife conservation perspective. I would also like to discuss the lack of proper enforcement of wildlife protecting regulations and the disenfranchising methods for trail development that have become status quo. Lastly, the Jackson Mountain Project area includes coinciding impacts from forestry and fire mitigation efforts that may have a synergistic effect.

There have been a number of peer reviewed studies that have demonstrated the impacts recreation has had on mammals. Many of these studies have come from Forest Service Research. Authors include the likes of MJ Wisdom and BK Johnson who wrote Seeking Ground Less Traveled: Elk Responses to Recreation. Science Findings report, USDA Forest Service Pacific Northwest Research Station. Issue number two hundred nineteen / September 2019. In this study, the authors found that Elk had flight responses of over 500 meters from hikers and significantly more for mountain bikers as compared to controls. In other words, habitat is lost due to trail construction and use. Other wildlife impacts from recreation are noted in Colorado's Planning Trails with Wildlife in Mind document. In order to best avoid these impacts, best practices should be utilized. Among the guidance on best practices is a note to "avoid, to the maximum extent possible, locating new trails within CPW mapped elk production areas, migration corridors, severe winter range, and winter concentration areas". Unfortunately, while this proposed trail system narrowly skirts Elk Sever Winter Range, it fails to comply with avoiding other big game delineations. Specifically, an Elk Winter Concentration Area, Elk Migration Corridor and Deer Migration Corridor. I am asking that at a minimum, no trails will be included in this project that fall upon Elk Winter Concentration Areas or fragment Elk Migration Corridors (See Attached Map). It is also fair to mention the executive order D 2019 011 in regards to the legal importance of maintaining intact big game migration corridors.

Discussions with biologists from CPW and the Forest Service have highlighted that the most sensitive habitat this planned project will fall upon are along the North, South, and Western sides of Jackson Mountain itself. Trails that agency biologists are concerned about on this level should not be constructed for the sake of local area wildlife. A balance is supposed to be mediated between recreation opportunity and wildlife impact. What loss potential is there for the opportunities of IMBA and the recreation community that justifies this magnitude of wildlife impact acceptance? It should be noted that the close by Turkey Springs is a valuable resource for outdoor recreation and one that was, at the time, supposed to satisfy the communities needs. What planning misstep led to the failure of such a vision? Should the community be rewarded for a shortcoming with a more is better gratuity? Ethical and thoughtful planning is critical to making multi-use forests sustainable.

The planning process outlined by the Planning Trails With Wildlife in Mind document is fairly straightforward. The first chapter is "The Collaborative Process." Within this chapter is a process outline that includes the first round of public engagement (see Page 9 Process 2. Public Engagement Round 1). Stated in this first round of public engagement is that no lines will be on the map yet. The Jackson Mountain Landscape already had trails on the ground at this stage as well as additional miles of trail that are now the foundation for the project scope. These trails were initially created by illicit means. Non-system trails (ie illicit, illegal or social trails) have fallen into a pattern of approval by land agencies in SW Colorado. The Log Chutes area and Turkey Springs are valid examples of this. Not only does approval of these trails send a message to the public that they can have what they want as long as they make it first... it also avoids the proper planning steps required to avoid issues like erosion, sedimentation, sensitive wildlife habitat avoidance, trail density and route efficiency. Page 41 of Planning Trails with Wildlife in Mind is dedicated to enforcement planning. It says that "Enforcement and education

planning should consider current and future capacity". If the Forest Service lacked the enforcement capacity needed to prevent illicit non-system trail construction on Jackson Mountain in the first place, how can we trust their capabilities assessment for a future of heavier use? If the Jackson Mountain Project moves forward, what assurances will the Forest Service make to step up enforcement? This will be especially important as unethical and non-approved trails are in a pattern of gaining approval from the agency. If more trail miles around Jackson Mountain are created beyond current non-system trail miles, illicit trail construction may continue into new territory. The temptation for constructing more trails by some user groups will expand with those newly approved miles via access to new terrain. The planning process has statutory and ethical requirements that in the case of Jackson Mountain, are not being met.

Another topic of concern is the overlapping of forest projects in the area and the complexity of navigating synergistic impacts in a complex proposal. Animals that live within recreation areas rely on dense understory as refuge during flight responses and high use times. Any fire safety project requiring a cleared buffer from Jackson Mountain Road, any forestry project that calls for forest health and resilience through understory mastication, and any other impacts from a proposed gravel pit all have the ability to create a synergistic effect. Trail response from wildlife will increase with an increased viewshed. Sounds will also travel further and increase flight responses. It will be important to maintain substantial understory refuge and naturally occurring visual barriers between and along trails. Overall, the complexity of managing multiple projects of different use at the same time offers too much room for error and will prove to be short-sighted in some capacity.

Colorado has a well documented concern with regards to the coexistence of wildlife and recreation on our public lands. Action must be taken by land agencies to limit the impacts recreation will have on wildlife so that future generations can enjoy the same resources that have been set aside for everyone to make use of. In regards to the Jackson Mountain Landscape Project, there have been multiple failures by stakeholders to uphold their duty to protect wildlife. 1) Wildlife impacts have been largely and effectively ignored during the early planning process with minimal concession. 2) The planning process skipped critical steps to designing and implementing a sustainable trail system as described by the Colorado Designing Trails with Wildlife in Mind document. 3) It is clear the Forest Service does not have the ability to properly enforce trail rules and regulations at current capacity. 4) Illicit trail users are being rewarded instead of punished. 5) Multi Use project complexity will have short-sighted consequences and synergistic effects.

It is my opinion upon reviewing these facts that more concessions must be granted in the benefit of wildlife on all accounts of this trail project. Enough of it to completely satisfy agency biologists, despite the desires of a trails community that is being rewarded for the poor behavior of illegal trail use.