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San Juan National Forest [ndash] Pagosa Ranger District Re: Jackson Mountain Project

Thank you for the opportunity to comment on the scoping phase of this project. As a frequent recreator and active member within the community associated with this proposal, I have found many areas of concern. I do not support the brute force approach that has been taken with the planning and development in this proposal and am saddened to see an attempt at taking advantage of a system that was designed to engage all user groups and facilitate responsible development on public lands.

The first area of concern is the lack of information on any alternatives. Given that this is in the scoping phase, it is not expected to be completely detailed or fleshed out, however, a brief synopsis of potential alternatives or areas of considered alteration would clarify a lot with the planning trajectory of the project. Further clarity and discussion of alternatives must be included and disclosed for public engagement when further considering this project.

While it is understood that this area contains suitable circumstances for the project in question, that does not preclude the agency from its responsibility to review the project, as a whole, from a landscape level. Looking at and understanding the impacts of the project is only one small step in the siting process. It has been explained that this location was [ldquo]selected[rdquo] based on desires more than need or suitability, and planning was initiated prior to any other areas being considered to fit the same need in an alternative area. Colorado Parks and Wildlife (CPW) was consulted early in this process, however, every aspect of consideration that CPW provided was somehow left out of the proposal. Like any other land use development plan on public lands, looking at the big picture and selecting the area of best fit for the project based on the best available science and the results of comprehensive analysis must transpire prior to selecting or eliminating any potentially suitable locations for the project.

Based on what has been provided from the agency for public consideration, the use of the San Juan National Forests (SJNF) own Land and Resource Management Plan (LRMP) (USDA, 2021) as well as the collaboratively developed [ldquo]Planning Trails with Wildlife in Mind[rdquo] recommendation and guidance document (Colorado Trails with Wildlife in Mind Taskforce, 2021) have been overlooked thus far in the consideration of this project. It is imperative that the agency utilize its own planning and guidance documents when considering projects on public lands. These documents lead directly into some of the considerations below.

Trails (Sanctioned & Unsanctioned/Pirated/Illegal)

As proposed, the trail system will incorporate 40+ miles of multi-purpose/use trails. When comparing the proposed trials system to wildlife data, it is clear that these trails were not planned based on the Planning Trails with Wildlife in Mind document. Additionally, it is clear that the LRMP has yet to be considered for the project.

The San Juan National Forest [ndash] Land and Resource Management Plan (SJNF-LRMP) contains many guidelines intended to facilitate responsible development on public lands within the field office. Some areas that are directly ignored in this proposal that must be considered in future phases and analysis for this project are;

* 2.3.60 [ndash] This element speaks to the consideration for and protection/preservation of critical winter range, severe winter range, and winter concentration areas for pronghorn, elk, and mule deer. This is intended to avoid negative impacts to the survival and reproduction of each species considered. There must be a comprehensive analysis for these key areas and seasons when further considering this proposal. It is clear that impacts will be

profound in already struggling deer and elk populations in this area.

* 2.3.62 & 2.3.63 [ndash] These sections focus on big game habitat and landscape level utilization as well as heard sustainability. All projects in big game critical winter range, winter concentration areas, severe winter range, production areas, and migration/travel corridors need protection to preserve and protect habitat effectiveness within those previously identified areas. Without this consideration, the E-31 elk herd that is already facing population level impacts will be further impacted. This must be considered when reviewing the proposed trails.

* 2.3.66 [ndash] The primary objective of this section is to maintain the integrity of seasonal movements by wildlife in an already complex and fragmented landscape. Furthering the use and impacts in the proposed area will pose a significant impact to the wildlife, specifically mule deer and elk, that utilize the project area for seasonal

movements, connectivity habitat, and security habitat. These factors necessitate consideration when analyzing the proposed project.

The Planning Trails with Wildlife in Mind document clearly identifies a planning strategy to ensure that recreational uses are facilitated in a sustainable manner that considers both the recreator as well as the various wildlife (game and non-game species) in the general area. Project proposals where siting and selecting is completed prior to assessing wildlife needs and concerns fall far short of meeting the standards, values, and mission of the planning documents that the forest has collaborated on and utilized for many successful projects. Simply put, the actions still needed as part of this project's consideration are as follows;

- * Identify and fully understand the recreational need,
- * Identify preferred development area as well as wildlife needs and considerations and understand conflict areas or areas to avoid,
- * Utilizing the previous analysis to select areas that fit both the needs of the recreator and the wildlife,
- * Developing a detailed and science-based land use plan.

When this planning method is employed, it is clear that a large portion of the trails proposed in this project do not conform to the protection and preservation of wildlife. This is a significant oversight and the trails that do not meet the objectives as described in the planning document should be eliminated from further consideration. Furthermore, any illegal or unsanctioned trails that fall within these areas should be completely decommissioned, fully reclaimed, and permanently closed.

Seasonal use restrictions, enforcement, & unregulated use are not fully discussed or considered in the proposal and need to be further considered when evaluating this project. The available staff for enforcement across the SJNF is troubling enough with what already exists on the landscape (Romeo, 2022). Applying seasonal closures has been proven time and time again to be ineffective. Certain user groups simply do not value the other user groups on the landscape and choose to ignore the science behind the closures. Additionally, no consideration has been given to the impacts that will be observed from increased human activity coupled with an increased presence of domestic dogs (Miller, 2001). These impacts should be considered and additional buffering and further limitation for users should be applied as the guarantee of recreation associated domestic animal interactions with wildlife are often overlooked.

Further issues arise in this proposal as the user group based in the San Juan River Village has direct and unregulated access to this area. As a part of the planning phase in this proposal, an analysis of unsanctioned/pirated/illegal trails and access points should be completed and a full decommissioning and reclamation effort of each should be completed to aid in the legal, responsible, and sustainable use of the proposal area. This effort should take place even if the proposal is altered, reduced or denied.

High Priority Habitats, as defined by CPW, that will be impacted from this project include elk Severe Winter Range and Winter Concentration Areas as well as elk and mule deer Migration Corridors. The unfortunate truth of this project is that, given the overcrowding of proposed trails and a plan for forest thinning and the removal of important security habitats, this project will result in a total loss of these critical habitat areas for wintering big game. At a minimum, the proposed sanctioning of pirated/illegal trails should be removed from the project scope, though a detailed review of disturbance buffers (Wisdom M. J., 2004) (Wisdom M. J., 2018) from multi-use trails necessitates a much more significant restructuring and removal within the scope. As proposed, a near total loss of habitat can be assumed as well as an expansive buffer around the entire area. A migration corridor and travel area will be impacted to the point of potential loss and the habitat fragmentation will further diminish the potential for recovery as the area ages. A scenario does not exist where the wildlife in the area becomes accustomed to the trails and the use and reestablish in the habitats impacted by the proposed project. Consultation with CPW must be a part of the project assessment and serious consideration should be given to CPW staff recommendations. Limitations should be considered, just like any other land use on public lands, to the amount of new disturbance and areas of impacted habitat per square mile in the project area.

Summary of trails suggested to be removed from further consideration based on impacts to wildlife and habitats:

* 106, 132, 301, 302, 400, 401, 402, 403, 405, 406, 407, 500, 501, 502, 503, 504, 506, 515, and 612

Summary of trails suggested to be altered or removed based on avoidance measure to protect wildlife and habitats:

* 300 and 303

Fuels and Vegetation Treatments

As proposed, fuels and vegetation treatments are proposed on as much as 3,500 acres in the project area. The areas within the proposal cannot sustain the impacts that will be generated from the trails expansions as well as the reduction of security habitat for wildlife in the area. An analysis and clear distinction should be made to show and incorporate areas of forest thinning and fuels management as well as areas treated to preserve and protect wildlife and habitat.

Gravel Pit

As proposed, the new gravel pit will impact an elk Winter Concentration area. Though this area provides the resources needed as well as a suitable location where the need is considerable, there must be further consideration on appropriate timing, noise, dust, noxious/invasive weeds, traffic, etc. mitigation to protect residents as well as wildlife and surrounding habitats. A detailed analysis and development plan with avoidance measures, minimization efforts, and mitigation plans will be of utmost importance.

Removing this portion of the proposal and placing it into its own analysis appears to be the most appropriate path forward. The consideration and project path for the gravel pit is substantially different from that of the trails as well as the fuel and vegetation treatment. If appropriately planned and mitigated, this gravel pit has the potential to provide a much-needed resource for the community.

The importance of planning and collaboration prior to the proposal stage cannot be stated enough. It is unfortunate to see so much hard work go into a proposal that contains a significant flaw and missing component that will likely, or should likely, lead to the elimination of a substantial portion of the proposal. Additionally, this project must consider legal action over a suggested need. Allowing the sanctioning and further use of unsanctioned/pirated/illegal trails should never be considered. A direct violation of the law should not be rewarded with the official acceptance and sanctioning of the illegal actions. Please consider the precedent being set with this consideration.

I appreciate the opportunity to comment on this project and look forward to a full and thorough evaluation of the proposal.

References

Colorado Trails with Wildlife in Mind Taskforce. (2021). Colorado's Guide to Planning Trails with Wildlife in Mind. Prepared by Wellstone Collaborative Strategies and Rocky Mountain Innovation Lab. Project supported by Colorado Parks and Wildlife in collaboration with land managers in City, County, State, and Federal government across the State of Colorado.

Miller, S. G. (2001). Wildlife responses to pedestrians and dogs. *Wildlife Society Bulletin* 29, 124-132.

Romeo, J. (2022). Tsk, tsk. Another year, another round of bad excuses for violating wildlife closures. *The Durango Telegraph*.

USDA, U. D. (2021). Final San Juan National Forest Land and Resource Management Plan. Volume II: March 2021 Update

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Wisdom, M. J. (2004). Effects of off-road recreation on mule deer and elk. *Transactions of the North American Wildlife and Natural Resources Conference* 69, (pp. 67-80).

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