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Comments: The proposed actions in the RMRI J-FIRM Project appear to primarily address commercial logging, tourism industry, and Falls Creek housing development interests while failing to provide actions that would achieve RMRI's stated mission of increasing forest resilience, wildlife habitats, and water resources. The summary documents and maps are thin on details and many of the actions appear to directly contradict, instead of support, the values the proposed actions intend to address.

Points of primary concern are:

1. Junction Creek Road - vegetation thinning. One of RMRI's stated goals is to "promote forest resiliency to insect, disease, and climate change." There is no discussion in this proposed action of how this activity will impact wildlife habitat, either the big game animals named in the proposal or other wildlife, such as birds, rodents, bats, etc. - species that help reseed forests and keep insect populations in check. How will the proposed thinning projects affect species that are critical to maintaining forest biodiversity? Will these areas be revegetated to replace understory destroyed or damaged by logging activities? How will the project address potential erosion and sedimentation impacts?
2. Junction Creek Road - permitted winter grooming - as seen in other areas of the San Juan National Forest and other regional forests, snow mobiling and nordic skiing are not compatible. Nor are snowmobiles compatible with "providing effective big game winter range" - value 3c. In 2019, the Durango Herald published an article about declining elk herds in SW Colorado - <https://www.durangoherald.com/articles/tough-winter-increases-chance-of-elk-calf-die-off/>. Causes include habitat loss, drought, and hunting pressures leading to late-born calves. The proposed action does not describe how the Forest Service intends to address potential impacts to wildlife in the affected area.
3. Junction Creek Road - road upgrade - while liquid sealant application makes sense to reduce dust and sedimentation impacts, particularly from increased commercial logging activity, paving the road to the Animas Overlook makes no sense. The plan does not explain why paving is included in the plan or what effect it will have on the stated values. Paving the road would greatly increase traffic on a road that sees more bike use than vehicle use on many days. Paving would essentially discourage bike use as vehicle traffic would increase exponentially, causing increased adverse wildlife impacts, road runoff and erosion, air quality degradation, noise pollution, and costs for maintenance. Without vehicle size limits, RVs of any size will be driving to the overlook.
4. Colorado Trail/Junction Creek Riparian Corridor - trailhead upgrades - the proposed action does not explain whether an actual need exists for increased parking at the Junction Creek trailhead nor how expanding the parking lot in a riparian area and floodplain is not in direct contradiction to value 2b.
5. Falls Creek - trail building. The proposal states that the newly constructed trails in this proposed action will "help address needs" #1c and #2b, among others. Was any Tribal consultation conducted prior to this proposal being published for public comment? If not, then how does the proposed action address the stated value of being sensitive and responsive to Tribes in protecting cultural resources? Tribes in the southwest generally favor leaving archeological sites undisturbed. How does constructing new trails for hiker, equestrian, mountain bikes, and e-bikes in a sensitive archeological area address the statutory requirements of the National Historic Preservation Act? The proposal indicates that Tribal consultation will occur at a later date - why is it included here if the Tribes have not had an opportunity to comment or propose changes? Nor does this proposal evaluate potential effects trail building will have on water, wildlife, and vegetation.

This document does not provide sufficient information to understand the full scope of the proposed actions or allow adequate opportunity to comment on the proposed project given the vagueness of the details included and lack of any discussion on how the proposed actions address the stated values. I would like specific notice of any action taken on this proposed project. If more information is available, please tell me where it is available.