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First name: David

Last name: Lien (Co-Chair, Colorado Backcountry Hunters & Anglers)

Organization:

Title:

Comments: Dear Sir/Ma'am,

I am writing regarding the Jackson Mountain "Area of Focus" and proposed trail system. This proposed trail systems overlaps with important deer and elk migration corridors, and a significant portion is an important winter concentration area for elk. This is the wrong project in the wrong place.

Jon Holst, a former Colorado Parks and Wildlife employee, is currently Colorado Field Representative for the Theodore Roosevelt Conservation Partnership. "According to Colorado Parks and Wildlife, there are nearly 40,000 miles of mapped motorized and non-motorized trails in Colorado," he explained in the Nov. 7, 2021, Daily Sentinel. "Some estimates suggest there exists an additional 25 to 30 percent of unmapped, user-created trails near popular mountain biking communities."

For example, illegal trails in the Durango area (and elsewhere) are causing issues for land managers, wildlife officials and trail advocates that can't rein in the longstanding problem. "We're not talking small connector trails," said Shannon Borders, spokeswoman for the Bureau of Land Management in a 2018 Durango Herald story. "We're talking miles of illegally built trails. And it's not like there's not a ton of recreational opportunities around town."

Durango area elk and hunters have been impacted by expanding mountain bike (and other) trail networks. "I had to leave one area due to ATVs. Then the great new area I found was recently designated semi-roadless instead of roadless, meaning mountain biking was allowed. The elk left," said Durango area hunter Bryan Peterson. "I hunted an area for years that always held elk. When they expanded the trails the elk vanished," added Johnny Rothones.

As detailed in a 2018 Colorado Backcountry Hunters & Anglers report ("Impacts of Off-Road Recreation on Public Lands Habitat"), "Wildlife habitat in Colorado is being significantly impacted by the proliferation of mechanized (i.e., mountain bike) and motorized (ATV/OHV) trails on public lands. Sportsmen and wildlife managers are finding that elk hunting opportunities, in particular, are being compromised by trail development in many parts of the state."

And given that a whopping 85 percent of Colorado's public lands are already open to biking, there are plenty of opportunities available without building a single new trail. In addition, most motorized routes are open to bikers. In fact, today some 92 percent of all national forest lands in Colorado lie within one mile of a road and there are over 17,000 miles of roads in Colorado's national forests. How many miles are enough?

With so much of Colorado's public lands base already crisscrossed with trails and roads, "access" has become "excess." It's a slippery slope from more mechanized and motorized trails to fewer elk and hunting opportunities, but here in Colorado we're already getting a disturbing preview of how it ends. Regarding the Jackson Mountain "Area of Focus" and proposed trail system, please take the following into consideration.

- Land managers cannot continue to reward illegal trail building with trail incorporation in their plans
- CPW's concerns early in the development of the illegal trails were largely ignored by the FS and alternative sites with less impacts to wildlife were not considered.
- Deer and Elk herds are in decline in the area, additional stressors will compound declining populations
- Existing measures like seasonal closures are ineffective without enforcement and enforcement is lacking due to funding issues within land management agencies.

- We can't trust a community that constructed trails without approval to follow rules regarding seasonal wildlife closures
- The planning of this trail system does not incorporate recommendations from CPW in "Colorado's Guide to Planning Trails with Wildlife in Mind"
- Trails on the Northern, Western, and Southern sides of Jackson Mountain will have the greatest wildlife impact, we don't want to see any of these trails developed
- Not all of the trails in the Jackson Mountain area that are proposed are currently on the ground as "non-system" trails. Increasing access to sensitive habitat on the N, W & S sides of Jackson Mountain will come with a possible increase in future illicit non-system trail construction
- Clearing of understory through mastication will increase visual and audible impacts from recreation. Trail development that coincides with forestry and fire mitigation projects within the same project area must allow for proper distribution of refuge habitat for animals to utilize when disturbed by recreation.

I ask that you consider scrapping this proposal in its entirety or, at a minimum, significantly modifying the proposal to appropriately consider the negative impacts to wildlife. Also see/reference the resources below for additional/related information on the impacts of trails on elk.

Thank you for your consideration.

Sincerely,

David A. Lien
Co-Chair
Colorado Backcountry Hunters & Anglers

- "Trails vs. Elk: 'They're Just Dying Off.'" Backcountry Hunters & Anglers: 12/3/21.
- "Colorado BHA Report: Impacts of Off-Road Recreation on Public Lands Habitat." Backcountry Hunters & Anglers: 5/21/18.
- Sylvia Kantor. "Seeking Ground Less Traveled: Elk Responses to Recreation." Science Findings #219 (U.S. Department of Agriculture-Forest Service Pacific Northwest Research Station): September 2019.
<https://www.fs.fed.us/pnw/science/scifi219.pdf>