

Data Submitted (UTC 11): 2/22/2023 12:55:50 PM

First name: Rick

Last name: Hooley

Organization:

Title:

Comments: As a hunter/angler/backpacking conservationist I strongly oppose this trail system for the reasons below.

Scientific studies have shown that trails fragmenting wildlife habitat adversely affect wildlife populations. Cow elk will eventually abandon their calves after being spooked by trail users repeatedly resulting in low calf recruitment and declining elk populations. Studies have shown that mountain bikes are the second biggest wildlife disruptor only behind ATV/UTVs. Also, with little or no enforcement of existing rules it is known that illegal "social" trails almost always branch off of legal trails. Please consider the very valid points below and think of the wildlife and not the economy for once. How many more trails do we need considering there are hundreds of mile of trails already in the area?

The Jackson Mountain "Area of Focus" and proposed trail system 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.

Many studies show how trail development/density/use can all have negative impacts on a variety of species. Public land managers have consistently turned a blind eye to illegal trail creation and eventually incorporate the illicit trails into management plans. Further, enforcement of seasonal closures meant to mitigate impacts to wildlife is almost non-existent and non-compliance is well documented. Now, a worst case scenario trail development plan, in part, initiated by illegal mountain bike trail construction has emerged on Jackson Mountain near Pagosa Springs. This project, if approved in its current iteration, will set precedent for recreationists to build trails wherever they like on public lands without consequence and to the detriment of our wildlife

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.

