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Comments: Thank you for the opportunity to comment on the Jackson Mountain Landscape Proposal. Great Old Broads for Wilderness is a women-led national grassroots organization that engages and inspires activism to preserve and protect Wilderness and wild lands. We believe that "wild public lands are treasured for their intrinsic values and protected for current and future generations". The South San Juan Broadband is a local grassroots chapter of Great Old Broads for Wilderness.

The premise that there is a "need" for trails in the Jackson Mountain landscape is based on the fact that mountain bikers have, for several decades, been creating illegal trails throughout the landscape. Had these trails not been illegally created and in effect, ignored by the Forest Service, would Jackson Mountain be the appropriate place for a trail system to be implemented? Absolutely not, if there was any adherence to CPW's Colorado's Guide to Planning Trails with Wildlife in Mind. CPW has stated that there would be other locations nearby for a trail system that would have much less impact on wildlife. If the Forest Service legitimizes these illegal trails at Jackson Mountain it sets a horrible precedent. Bikers will be able to choose which new landscape they would like to build a trail through, create their trail system and then ask the Forest Service to legitimize those trails. Illegal trail building is proliferating throughout the San Juan Mountains, and something must be done by our public lands agencies to stop it. Are other public lands users (timber, mining, grazing, outfitters, campers, etc.) allowed to proceed wherever and however they want and seek approval later?

Wildlife populations, including deer and elk, are on the decline in southwest Colorado. Habitat fragmentation due to ever increasing recreational use is a major contributing factor in that decline. With the projected increase in population recreational pressures will also increase. We are witnessing "death by a thousand cuts" with each new trail system. The Jackson Mountain landscape includes nearby critical elk winter range and parturition areas. We do not understand why there are no migration routes noted on the interactive landscape map. We have seen maps elsewhere that note that there are migration routes within this landscape. If these trails are built it is likely that elk and deer will abandon the area. To go where? Recreationists, but in particular mountain bikers, want new trails, wildlife NEEDS appropriate, unfragmented habitat.

Seasonal closures are often seen as the compromise that will allow trails to be built in wildlife habitat. Unfortunately there is little money or manpower to enforce these closures, and users will ride or hike right past the "closed" signs and barriers, making this a completely ineffective tool for protecting wildlife during the critical winter months.

With the lack of enforcement on the current illegally built and used trails we have little reason to believe that there would not be further creation of social trails on the landscape if this "sustainable" trail system is approved. There is and likely will be an insatiable desire for steeper, more technical, longer routes to bike. And often calling trails "mixed use" is not an on-the-ground reality. As experienced hikers, we know that trails with a lot of bike use are often an unpleasant and sometimes dangerous experience. Scrambling to get off the trail as bikes hurtle towards you is not the experience most hikers are looking for on our public lands. Bikes are allowed on motorized routes and all Forest Service roads, as well as existing mountain bike trails. At least 85% of Colorado's public lands are already open to biking. When will there be enough?

It would be helpful if this scoping document did not include so many different projects. To lump the trail project together with commercial forest products removal, fuel reduction and a gravel pit dilutes public input on each individual project. The inclusion of the proposed gravel pit in particular, because it is seen as a quality of life issue by nearby residents, seems to have drawn attention away from the other proposals.

The vegetation treatments may exacerbate problems for wildlife (all wildlife, not just big game). This area was previously logged and therefore lacks historic old growth. Large trees provide thermal cover (in both summer and winter) for wildlife and should be left on the landscape. We understand the need to make the landscape more resistant to destructive fires. Prescribed burns should be the primary means of restoring habitat diversity and creating fire resilience. Mastication and mowing do not mimic any natural processes within the forest. Thinning within the landscape in addition to a dense trail system reduces cover for all wildlife within that landscape, further reason for wildlife to abandon the area.

Again, thank you for the opportunity to comment on this proposal.