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First name: Janet

Last name: George

Organization:

Title:

Comments:

To: U.S. Forest Service, Pagosa Ranger District, San Juan National Forest

From: Janet George

RE: Jackson Mountain Project

Thank you for the opportunity to comment on the Jackson Mountain project. The story board and scoping letter were helpful to understand the proposed project. Overall, I support the concept of taking a broad scale landscape level analysis to areas for long term planning. However, I do not support the Forest Service practice of not holding individuals and groups accountable for illegally constructing trails and then conducting a NEPA process to legitimize the illegal trails and adding more trails in high priority wildlife habitats including elk winter concentration areas, severe winter range and migration corridors. In the Jackson Mountain project, wildlife impacts have not been adequately evaluated or considered.

I offer the following specific comments:

1.The scoping letter and associated documentation do not present any analysis of trail density expressed in linear miles of trail per square mile within high priority elk and deer habitats. Colorado's Guide to Planning Trails with Wildlife in Mind (2021) recommends no more than one linear mile of trail per square mile in elk and deer severe winter range, winter concentration areas, production areas and migration areas. I respectfully request that the Forest Service provide a calculation of the linear miles of illegal and proposed new trail mileage per square mile of high priority elk and deer habitats to allow analysis of wildlife impacts and to not exceed the recommended one linear mile of trail per square mile of high priority deer and elk habitats.

2.The Forest Service has studied elk responses to ATV's, mountain bikes, hikers and horseback riders (Wisdom et al. 2018, Kantor et al. 2019). The study found that elk avoided ATVs by 880 m, mountain bike riders by 660 m, and hikers and horseback riders by 550 m. In addition, based on at least 30 peer reviewed studies, elk are displaced from forest roads and trails by 0.5-1.5 km. Displacement is greatest for motorized and mountain bike riders and less for hikers and horseback riders (Wisdom et al. 2018). When elk avoid recreation trails and recreationists, their habitat is compressed. This is a form of habitat loss similar to the well documented effect of roads and traffic on elk and other wildlife (Kantor et al. 2019). Habitat compression on public land can cause elk to move to private land (Kantor et al. 2019) leading to increased elk-human conflicts, over browsing and a reduction of habitat and social carrying capacity for elk. Based on the Forest Service's own studies, I request that the Pagosa Ranger District provide a map with a conservative 500 m buffer along illegally constructed trails and proposed new trails, and provide a numerical assessment in acreage of high priority elk habitat that will be lost due to the proposed Jackson Mountain project. The environmental analysis should also evaluate the impact to the elk population that is already in decline.

3.Colorado Parks and Wildlife (CPW) has communicated concerns regarding the illegally constructed trails currently on the ground and the proposed new trails on Jackson Mountain. I respectfully request a response from the Forest Service to CPW's concerns and to evaluate alternative areas for the mountain bike park that would result in fewer wildlife impacts or modify the Jackson Mountain project significantly to address and avoid wildlife impacts. CPW has said that Jackson Mountain is not the best place for the mountain bike trail system from a wildlife impact perspective so why is the Forest Service allowing illegal activities dictate where to build a mountain bike park?

4.One of the arguments for the proposed mountain bike park at Jackson Mountain is to reduce further illegal trail

construction. I respectfully request the Forest Service to provide a case history, or better yet, a peer reviewed study where legitimizing illegally constructed trails and building more trails did indeed reduce further illegal trail construction. My experiences have been that legitimizing illegally constructed mountain bike trails and developing new trails leads to additional illegal trail construction within, and radiating out from, the project trail system, especially when combined with forest thinning activities.

5.The Forest Service should enforce regulations against illegal trail construction even if it takes including mechanized travel (e.g. mountain bikes) in Forest Service travel management plans. Illegally constructed trails are a growing problem throughout Colorado. Many, if not most, illegal trails are not just "rode-in." More often tools and work parties are used which clearly is outside Forest Service regulations. Currently, mountain bikers know that it is illegal to build trails, but not illegal to ride those illegally constructed trails and, as proposed here, the Forest Service has formalized illegally constructed trails in the past which is now becoming an expectation among trail users. I can understand the challenges of this situation and appreciate the demand for more trails, but the demand appears to be bottomless and detrimental to sustainable wildlife populations when dense trail systems are built in high priority wildlife habitats. I respectfully request the Forest Service to include enforcement and education strategies to reduce illegal trail construction activities in any mountain bike park or trail system plans.

6.The Partners listed in the story board are heavy on representation from mountain bike interests. There are several statewide and local wildlife conservation organizations including Audubon, Colorado Wildlife Federation, Backcountry Hunters and Anglers, Rocky Mountain Elk Foundation, and the Mule Deer Foundation that do not appear to have a seat at the table for the Jackson Mountain project, but these groups have a significant stake in the outcome. What outreach has occurred to hikers, equestrians, photographers, wildlife viewers, etc.?

Thank you for the opportunity to comment on the Jackson Mountain project. In summary, I recognize the value of recreation trails on Forest Service land to people, their well-being and local economies. I whole heartedly support smart development of public land trails in areas where development does not fragment high priority wildlife habitats and follow best management practices. In addition, stakeholder involvement should be representative of all who have a stake in trail system development. Unfortunately, representative involvement and assessment of wildlife impacts have not been adequately addressed in the Jackson Mountain project proposal. The Pagosa Ranger District should stop plans for development of a mountain bike park and close illegally created trails on Jackson Mountain, or at a minimum, significantly revise the mountain bike park plans to remove illegal trails and to not build new trails in deer and elk severe winter range, winter concentration, production and migration areas, and other sensitive wildlife species habitats.

Literature cited:

Colorado Trails with Wildlife in Mind Task Force. 2021. Colorado's guide to planning trails with wildlife in mind. Prepared by Wellstone Collaborative Studies and Rocky Mountain Innovation Lab. Project supported by Colorado Parks and Wildlife in collaboration with land managers in City, County, State and Federal governments across the State of Colorado. 58 pages. <https://cpw.state.co.us/aboutus/Pages/Planning-Trails-for-Wildlife.aspx>

Kantor, S., Wisdom, M., Johnson, B. 2019. Seeking ground less traveled: elk responses to recreation. Science Findings 219. Portland, OR. USDA Forest Service. Pacific Northwest Research Station. 5 pages. <https://www.fs.usda.gov/pnw/publications/seeking-ground-less-traveled-elk-responses-recreation>

Wisdom, M. J., Preisler, H. K., Naylor, L. M., Anthony, R. G., Johnson, B. K., Rowland, M. M. 2018. Elk responses to trail based recreation on public forests. Forest Ecology and Management. 411:223-233. <https://www.fs.usda.gov/treesearch/pubs/56220>.