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Comments: As both an avid mountain biker and big game hunter, who is a member of the International Mountain Biking Association (IMBA) as well as RMEF and Backcountry Hunters and Anglers, I oppose the proposed Jackson Mountain Trail network. Expanding trails for non-motorized use to include mountain biking is generally something I strongly support. However, that is not something that should be done in areas that have the strong potential to impact wintering wildlife.

Fundamentally, this project should have been proposed in a different location based on the feedback from CPW and selection of locations that would be better for a mountain bike park, both for the users and for wildlife. Using the location of an existing illegal trail network that conflicts with sensitive wildlife habitat continues a precedent that should be avoided as we are able to understand the impacts to wildlife and select locations that are significantly more optimal for all the stakeholders.

The impact of trail networks, and the additional users, on wildlife populations is well documented in many studies. In the existing trail network that is proposed, the most desirable trails for mountain biking, leading to and from the top of Jackson Mountain, are also the ones inside the elk winter concentration area and closest to the elk severe wintering range. These trails, that are south of FS 37, are the most critical to appropriately manage in order to minimize the impact to wintering wildlife. Eliminating use during specific periods of the year can be successful if area closures are enforced and adhered to. However, successful enforcement of seasonal trail closures requires additional funding, and funding is not something that the mountain biking or hiking communities have established a method for contribution. This is in contrast to the hunting and fishing communities who have widely supported the use of taxes on equipment and licensing fees to support the resource that they benefit from. Therefore, to offset the negative precedent that may be set by this trail network moving forward, a use fee similar to that of the state parks should be utilized to fund additional enforcement and maintenance that will be required.

As a hunter and a mountain biker I oppose this project due to the way it has come to be and the location chosen. In order to offset that and create a situation that is not detrimental to the wildlife I strongly support establishing a way to fund additional enforcement of seasonal closures and illegal trails.

Ryan Parker

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