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Comments: Thank you for the opportunity to comment on the Jackson Mountain Landscape Project.

My major concern with this project is the proposal for 40 plus miles of "multi-use" trails in this landscape. My reasons for concern are as follows:

- There are no alternative sites that were considered for this trails project. It appears to have been selected due to the fact that there are numerous illegal user created trails in this area that the Forest Service has done nothing to control for the past several decades. The fact that IMBA and the local trails group (DUST2) have invested significant funds in planning this project leads one to believe that the Forest Service has already given a wink of approval to these groups.
- The concerns that CPW expressed when planning for this project began appear to have been completely ignored. It is apparent that the document "Planning Trails With Wildlife In Mind" has also not been taken into consideration, nor has the SJNF's own Land and Resource Management Plan, which requires consideration of impacts to winter range, production areas and migration corridors for deer, elk and pronghorn.
- CPW's data shows that the Jackson Mountain Landscape Project encompasses elk Severe Winter Range, Winter Concentration Areas and elk and mule deer migration corridors. The E-31 elk herd is already experiencing decreasing numbers and cow/calf ratios. Hunting opportunities in the area have been reduced due to this issue....how can a very dense trail system be approved in the same area?
- The density of this trail system is troubling, far exceeding recommendations for areas important to wildlife. If you add the buffer zones around the trail system it will likely preclude elk and deer from using the area.
- Winter closures are often suggested as a way to lessen trail system impacts on deer and elk. These closures have proven to be very ineffective. The FS does not have the funds or manpower to enforce these closures, and there are some users who refuse to honor them. Gates and signage will do no good when residents of San Juan River Village have their own access points to the trail system.
- The precedent of allowing mountain bikers to create (and in many cases, actually build) trails wherever they want and then legitimize those trails is very damaging, locally and nationally. We all know that "rogue" trails are becoming a huge problem on our public lands. This has to stop. Wildlife habitat is disappearing at an accelerating and disturbing rate.
- I frequently recreate on our public lands, and recognize the importance of recreation to our economy and our health. But I strongly object to the idea that we have the right to recreate anywhere, anytime that we want on public lands. These lands are ecosystems, NOT amusement parks, and all of us need to realize the need for restraint.
- I see so many references to these trails as a "need". That is simply not true. These trails are a "want" for the mountain biking community. When these trails become popular they will express a "need" for more trails, or trails that are more challenging, or more fun, or closer to home. If we want to preserve adequate wildlife habitat we need to start now.
- I challenge the idea that many of these trails will be multi-use. Trails that are designed and built to challenge intermediate and expert riders will be dangerous for hikers and equestrians, as bikers tend to ride very fast on them. This trail system will likely end up serving mainly one user group.

The Forest Service should consider alternative sites for a trail system, sites that will have less impact on wildlife and that do not legitimize illegal trail construction. At the very least, trails that are in critical winter range and migration corridors should be removed. The remaining trails need to be far less dense than proposed.

I don't believe that the gravel pit should be in the same scoping process as the trails proposal. It seems that there is a real need for a gravel pit in the county, but the nearby neighbors are opposed on the grounds of traffic, safety, noise and air quality concerns. I don't see how this can be addressed in the same scoping process. CPW

notes that the gravel pit falls within the elk Winter Concentration Area and recommends no mining operations take place between December 1 and April 30. If that seasonal closure is not something that is feasible for operation of the gravel pit, then it should be denied.

As far as the vegetation treatments, again, it seems like this should be in a separate scoping process. Vegetation treatments should mimic natural processes as much as possible. Mastication does not mimic a natural process. Controlled burns should be the go-to for restoring these lands to a healthier state, more resistant to catastrophic fires. Removal of vegetation in combination with the trail system is a bit of a double whammy for wildlife, leaving them less cover and more exposure to recreation. Another reason for wildlife to abandon the area.

In summary, there are too many different projects included in this scoping process. I urge the Forest Service to find another site for the mountain bike trails, one that makes sense for recreation AND wildlife. The existing bike trails should be decommissioned and rehabilitated. The Forest Service struggles to maintain and "police" the trails that already exist in SJNF - let's not add more.

Thank you for your time and consideration.