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Comments: Thank you for the opportunity to comment on the Junction-Falls Creek Integrated Resource Management Project.

Has the Forest Service completed a trail inventory of both system and user created trails in the Junction Creek/Logchutes upland, as requested by CPW in their comments of 2022? This upland is within CPW mapped elk and mule deer winter concentration area High Priority Habitat. Colorado's Guide to Planning Trails With Wildlife in Mind states:

Limit route densities within high priority habitats to an average of 1 linear mile of road or trail per total square mile for the species indicated in the best management practices table.

Big game species like deer and elk require large blocks of habitat that have adequate canopy cover for security areas. Placing trails within these blocks of habitat displaces wildlife. It has been shown that wildlife do not habituate to hiking and mountain biking, resulting in more movement to avoid these activities. This results in less time for foraging and rest, which has a negative affect on body condition and decreases the amount of available habitat.

The plan for a 400 ft wide (wider than the length of a football field) downhill mountain bike trail, currently a user created trail, is not appropriate for this area. Neither is the other downhill mountain bike trail, location yet to be determined. I understand that there is demand for more downhill mountain bike trails, but they need to be located properly. Adopting this user created trail sets a terrible precedent, indicating that all that needs to be done to get new trails into the system is to go out and create them yourself; they will ultimately be adopted as trails by the Forest Service. Somehow we all have to realize that we cannot recreate wherever we want, whenever we want, however we want without negative consequences to wildlife, land and water health. We can't continue to fragment habitat that serves many species other than our own. Too, SJNF lacks the funds to maintain and "police" current trails. We cannot keep adding more.

The proposal to chip seal or pave Junction Creek Rd to the Animas Overlook would invite drivers to speed more than they already do. What would be the effects of increased speed and increased use on wildlife?

Grooming Junction Creek Rd to the Animas Overlook in the winter puts increased recreation, including motorized vehicles, into high priority winter range for deer and elk when they are already stressed. This, too, is a bad idea.

Stabilizing the lower portions of the Colorado Trail and closing social trails to the creek seems to be a good idea. There will need to be some access points to the creek, or social trails will pop up again. Upgraded bathrooms and trash collection are needed for such a popular trailhead.

The Falls Creek/Hidden Valley area is also CPW mapped elk and mule deer winter concentration area High Priority Habitat, as well as elk Severe Winter Range HPH. This area also provides for habitat connectivity for big game. The October 2022 J-FIRM comments from CPW outline the history of the area since management by the SJNF began in 1993. The Forest Plan determined that area should be managed for wildlife diversity, with an emphasis on deer and elk. There were to be seasonal closures on all recreation, and mechanized travel was to be limited to designated routes (of which there are none). Three decades of non-enforcement of recreation activities has resulted in year round uncontrolled use by both mechanized and non-mechanized recreation. Forage quality has also deteriorated. Since the inception of FS management elk and deer herds that historically used this area have decreased significantly.

I understand the pressure on our public lands agencies to provide more and more opportunities for people to recreate on those lands. Recreation is an economic driver, and provides exercise, adventure, and an opportunity to appreciate the beauty of the area. But we have to know when to say when. I see and hear about more and more people who are out trail running at night, backcountry skiers unknowingly skiing right through winter bighorn habitat, mountain bikers building social trails everywhere. There needs to be a bigger push to educate public lands users about the impacts on those lands, and especially on wildlife.

Thank you