

Thank you for the opportunity to comment on this scoping proposal. I live on County Road 205, near the J-FIRM project area, and frequently visit to birdwatch and observe wildlife, enjoy nature, and to hike, ski, and bike with friends and family.

A few general comments on the scoping process:

- The scoping document lacks the needed specificity for the public to provide well-informed comments. The J-FIRM scoping document dated 9/14/2022 has only miniscule changes from the pre-scoping document from 1/31/2022. If substantial work had taken place between January and September, this is not reflected in the new version of the document, and in many cases, the document does not reflect an understanding of site conditions. The maps in the scoping documents provided insufficient details to understand project plans.
- There has been little public awareness about this project in the Durango area. An article in the Durango Herald came out on 10/12/2022, just two days before comments were due. I appreciate that the comment form was kept open until October 28 for the public to review and comment on the scoping document. It is requested that the Forest Service consider all comments submitted between October 15-28 through a full evaluation as part of the formal scoping period.

The following comments are in order of the organization of the scoping document, with main sections in bold.

Needs for the Proposal and Project-Wide Considerations

I agree with need to address Forest Plan guidance specific to the Falls Creek Archeological Area. However, the RMRI objectives are broad in scope and seem to be missing some key needs, for example:

Action 3a, Forests and Wildlife, “Restore diversity in forest structure and age classes” does not address ecosystem function.

Action 3c, “Provide effective big game winter range and elk production areas.” Only large ungulates are considered, not birds, small mammals, large carnivores, reptiles, amphibians, insects, or other species. All of these species benefit ecosystem function and are valued by human forest users. For example, bird watching has an economic benefit of \$41 billion in the United States, with over one in five Americans engaged. It is a relatively inexpensive hobby, so it is accessible to most visitors to the San Juan National Forest. More than half of U.S. birds are in serious decline (North American Bird Conservation Initiative 2022). The Living Planet Index for 2022 shows an average decline of 69% of wildlife species populations globally, and 20% in North America, from 1970 to 2018. (Westveer, J. et. al. 2022). While declines may not be as steep in southwest Colorado, local wildlife is facing many of the same threats listed in the report (Jaros, G. 2022). Given these trends

- The EA should address in detail how the Forest will ensure conservation protection of Threatened, Endangered, and Sensitive (TES) and candidate species, species of conservation concern, and focal species as described in the San Juan National Forest Plan (SJNF Plan, 2021, .

- With downward trends in such a large portion of wildlife species, the EA should address how declining wildlife species will be protected, in addition to TES species. For example, even species once considered common are now in sharp decline. In the scoping area, tipping point species such as pinyon jay, rufous hummingbirds, and olive-sided flycatchers have lost nearly half of their populations since 1970 (North American Bird Conservation Initiative 2022).
- U.S. Fish and Wildlife Service (USFWS) Birds of Conservation Concern should be considered in all project planning. The following Birds of Conservation Concern might be expected to be present in the scoping area, according to an IPaC-generated list for the project area (a project planning tool from USFWS): Bald Eagle, Brown-capped Rosy Finch, Cassin's Finch, Clark's Nutcracker, Evening Grosbeak, Grace's Warbler, Lesser Yellowlegs, Lewis' Woodpecker, Olive-sided Flycatcher, Pinyon Jay, Virginia's Warbler.
- The EA should describe plans for mitigating impacts for nesting songbirds, raptors, and other species. It should also describe how proposed activities will have adequate buffers for these species (Colorado Trails with Wildlife in Mind Taskforce, 2021). Seasonal closures might be considered as part of a mitigation plan for various wildlife species.
- The EA should consider a process similar to that accomplished by Envision Chaffee County to assess wildlife trends, conduct mapping and create a Recreation Planning for Wildlife Tool: "After assessing current wildlife trends and finding 65% of indicator species populations to be in decline, the Council and community set a goal to stabilize, and ideally reverse, these trends. To start, they asked, 'Can we create a recreation suitability tool that helps to protect wildlife as recreation grows, and will it be useful to groups in the community as they plan management actions and potential new recreation development?' Using a framework similar to their community wildfire protection plan, they compiled species and habitat data and used geospatial modeling to get a picture of the cumulative potential impacts of recreation on 44 species of wildlife and their unique habitats. Data was adjusted for species lacking precise or up-to-date mapping to maximize the tool's efficacy. Envision also evaluated and mapped existing disturbance intensity from recreation and development." These two maps were then combined to create a Recreation Planning for Wildlife Tool (Colorado Trails with Wildlife in Mind Taskforce, 2021).

Impacts to Wildlife Must be Avoided, Minimized, and/or Mitigated throughout the Project Area

To minimize wildlife impacts, it is critical to account for how proposed trails and other activities interact with blocks of habitat. Habitat is directly lost due to the development of infrastructure (e.g., roads, trails, trailheads, parking areas), and additionally through avoidance of these areas by wildlife. As route densities and other impacts increase, zones of influence may increasingly overlap with each other, severely reducing habitat effectiveness or eliminating wildlife habitat altogether. In other words, the cumulative effects of multiple trails, routes, and other developments with overlapping buffer zones can impact a substantially larger area compared with the direct habitat loss. Strategies should be used to maintain functional blocks of habitat and connectivity of movement corridors (page 28, Colorado Trails with Wildlife in Mind Task Force 2021).

Human activities related to trails, road development (including increased traffic and higher speeds resulting from paving/chip-sealing), and other activities have varying effects on wildlife species depending on many factors, including the level of human use, the type of activities, habitats involved, time of day or season, and the species affected. Scientific literature documents impacts of human

disturbance on wildlife as detrimental and widespread, with no positive benefits to wildlife species studied with increases in human access by mechanized, motorized, foot or horse use.

Trail Decommissioning, Monitoring, and Adaptive Management: As part of meeting route density guidelines, the EA should describe how social trails and illegal user-created trails could be decommissioned and reclaimed to enhance or reconnect wildlife habitat. For all project activities, consider establishing wildlife baseline monitoring for sensitive species prior to any disturbance, along with an effective initial evaluation and a plan for ongoing monitoring to ensure that wildlife habitat remains intact and functional. Adaptive management approaches should be incorporated, as well as evaluation of new research. Incorporate enforcement and public education planning into the project plan.

Tribal Consultation: All project areas are on homelands and hunting grounds of Indigenous people, not just the Falls Creek/Hidden Valley Geographic Area. Consultation with the 25 affiliated tribes should occur for all proposed activities at multiple decision points. Opportunities for tribal co-management or collaborative co-stewardship should be considered for the Falls Creek Archaeological Area.

Direct, Indirect and Cumulative Impacts: To ensure that environmental information is available to public officials and citizens before decisions are made and actions are taken, the Forest Service must disclose all impacts of this proposed project [40 C.F.R. §§ 1502.16; 1508.8, 1508.25(c)]. This includes direct, indirect, and cumulative impacts (or effects) that the proposed project may have, as well as connected, cumulative, and similar actions. In addition to examining the direct impacts of the proposal caused by the action, the agency is obligated to analyze impacts that extend beyond the immediate, physical, on-the-ground effects of new trails and expanded parking lots, bank hardening, logging and fire mitigation activities, and winter grooming. These indirect and cumulative impacts may include effects related to changes in land use and recreation patterns, and related effects to ecosystems, wildlife, and other natural systems [40 C.F.R. § 1508.8(b)].

In addition, the San Juan National Forest is experiencing burgeoning recreation pressure from increasing numbers of people on the landscape, a situation that has been further exacerbated by the COVID-19 pandemic. Many other factors influence these public lands, such as climate change and extreme drought, historic logging, beetle kill, changes in bike technology, and other recreational shifts. As such, it is critical that the agency take a hard look at the direct, indirect, and cumulative impacts from this proposal.

Junction Creek Road/Logchutes Uplands Geographic Area

Prescribed Fire: I am supportive of prescribed fire as a tool to use in achieving wildfire mitigation and ecological benefits, when carried out with proper prescriptions that consider today's highly erratic climatic conditions to ensure safety for the forest and for adjacent landowners.

- The EA should describe the objectives to be achieved via prescribed burning for each prescribed fire burn unit, as well as the expected return interval for prescribed burning in the unit.

Vegetation Thinning: As a neighbor to the Forest, I can appreciate wildfire mitigation efforts. However, due to high biodiversity and recreational values in the area, any vegetation thinning, and particularly commercial timber harvest, will need to be carefully weighed against the benefits. The experience of the 416 Fire and other recent wildfires in similar forest types, where treatments have been implemented, might help to guide where if any forest thinning is needed. Hand thinning is likely the primary work needed to meet wildfire mitigation and forest resiliency goals. Having spent significant time walking in these forests, I question whether 1500 acres are suitable for commercial thinning due to previous logging,

steep slopes, wildlife and recreational values, unique attributes, and the need to protect mature and old growth trees.

- The EA should include GIS data and mapping, and descriptions of the type of field review and forest stand inventory to be completed prior to proposed vegetation thinning. This should include an inventory of old growth and mature stands, old growth and mature forest recruitment, as well as unique habitats such as aspen, cottonwood, willow, mixed conifer, and pinyon/juniper stands.
- Mature and old growth trees are the most fire resistant, and large trees have already been cut from the Logchutes area historically. Ponderosa pine, spruce and fir trees over 16" DBH should be retained, using the criteria for determining old growth forests as described in the SJNF 2013 Final EIS, page 705. Likewise, aspen DBH ≥ 14 " and pinyon and juniper ≥ 12 " diameter at root crown should not be cut.
- The EA should describe how it will prioritize old growth recruitment areas, as stated in the SJNF Forest Plan (2021) 2.2.74, p. 27: "Prior to any proposed agency actions on forested lands or woodlands, the affected stands should be screened against the current SJNF old growth database in order to determine their old growth status. Within landscapes not meeting desired conditions for old growth, ponderosa pine forest stands and mixed conifer forest stands that currently are not in the old growth development stage, but that contain significant old growth attributes should be prioritized as old growth recruitment areas, largely based on tree age and distribution across the SJNF, and managed for their old growth values."
- The EA should follow policies set forth in Executive Order 14072: Strengthening the Nation's Forest, Communities and Local Economies, which sets forth a policy to protect mature and old-growth forests, preserve biodiversity, mitigate the risks of catastrophic wildfires, and protect public lands for recreational activities. The EA should consider stewardship of old growth and mature trees in light of their important role in mitigating climate change.
- Biodiversity impacts (including flora and fauna) must be considered as noted under project-wide considerations.
- I oppose the expensive and intrusive use of helicopters in the Colorado Roadless Area, which will cause disturbance and fail to achieve wildfire mitigation goals. Alternatives to helicopter logging should be evaluated.

Permitted Winter Grooming: In a time of climate change and extreme drought, as well as the mostly south-facing aspect of Junction Creek Road, the viability of winter grooming is questionable. Winter parking is a problem at the upper gate, and I have seen vehicles get stuck there because of icy conditions and closely parked vehicles.

I support the seasonal closure date to December 1, as early snow can create problems on Junction Creek Road. I have not seen snowmobile use on Junction Creek Road, and oppose that snowmobiles be included as users.

Road Upgrade: I oppose chip-sealing or paving to the Animas Overlook, as this will likely lead to faster driving speeds, will create safety issues and conflicts between various user groups, and will further impact wildlife habitat. It may also encourage users to camp illegally in this area which is relatively close to

Durango, thereby increasing the risk of wildfire ignitions. Chip-sealing only to the upper Junction Creek parking lot may be a viable option to reduce dust at Junction Creek and the Colorado Trail.

Designate Downhill Mountain Bike Trails: The scoping proposal identifies a downhill mountain bike corridor, approximately 3.5 miles in length and 400 feet wide, with parallel terrain features of different ability levels and bypasses for beginning riders. For a sense of scale, construction today of an interstate highway requires only 150 to 300 feet of right of way. There is insufficient detail in the document to explain why this corridor is planned to be an astounding 400 feet wide. Even if vegetation is kept intact in parts of the corridor, it seems completely inappropriate within this area of the Forest. This type of downhill mountain bike corridor may be appropriate at a developed ski area, but not in an undeveloped forest area that is habitat for many declining species, and includes important habitat connectivity from summer ranges to wintering grounds for elk and mule deer.

Recreational activity can affect wildlife in three principle ways:

1. Stress/Disturbance: Wildlife respond to human activity by becoming stressed, altering behavior, avoiding areas of activity, or confronting/attacking humans. These responses can detrimentally affect the fitness of individual wildlife or populations. Recreational displacement of animals may be short term (i.e., minutes or hours) or permanent.
2. Alteration of Habitat: The presence of human activity and/or infrastructure serves to remove or fragment habitat for wildlife, or can create artificial habitat which elicits change in population dynamics or encroachment of new species/populations.
3. Collision/Mortality: Wildlife hit by humans or their vehicles can result in injury or death.

The construction of linear features like these downhill bike trails and the resulting effect on wildlife that depend on that habitat is a topic of current concern in the science community. Summarized at the end of these comments are a few citations from the growing scientific and agency literature that document negative impacts on wildlife from human recreation, as well as management recommendations from various agencies.

I vehemently oppose a downhill mountain bike corridor of this width, and note the following:

- Any trail corridor of this size will create significant environmental impact, both in terms of context and intensity, and would likely trigger analysis through an EIS process.
- To what extent will vegetation be removed or impacted, in the short- and long-term? How will erosion and degradation be prevented, and what is the long-term maintenance plan? How will this maintenance be balanced against the need to maintain all of the many trails in the Forest, many of which are not maintained currently? How will dust and sediment be mitigated in both its construction and regular use?
- Please provide a detailed map to show the location of the 3.5-mile and 1 – 2.5-mile downhill mountain bike trails, including vegetation types, wildlife habitat, springs and wetlands, other unique habitats, and existing trails.
- The EA should describe how plans for trails, trailheads, and other developments will minimize habitat fragmentation and habitat functionality for wildlife. The Guide to Outdoor Planning (Colorado Trails with Wildlife in Mind Task Force 2021) provides relevant core principles

(specifically science-based decision making, equity and inclusion, working together, and minimizing impact.)

- The Guide's outcome-based trails planning framework provides excellent guidance for bringing together the conservation and recreation community collaboratively with government agencies. An important precept: "While planning, it is important to remember the cumulative impact of other stressors on wildlife, and to put trail development in that context." (p. 12)
- As described in the "Outside 285 Case Study" (page 18), this proposed project should use a collaborative process to create a habitat analysis, including an Existing Disturbance map (to evaluate cumulative impact) and a Habitat Sensitivity Map (to evaluate relative sensitivity and habitat priority.) A downhill trail of this should only be sited in an already disturbed area that does not contain recognized migration corridors or sensitive habitat.

Spring Redevelopments: While I appreciate the goal to make springs available for wildlife, given drought conditions and climate change, is there sufficient water for redevelopment? At which springs? The use of heavy equipment seems counter-productive, given the water availability of the springs in the project area.

- Please address the current condition and specific objectives for each spring re-development proposed, and provide a map of the proposed projects.
- Please ensure that wildlife considerations include the diversity of plant and animal species that rely on these springs and wetlands, not just big game.

Colorado Trail/Junction Creek Riparian Corridor Geographic Area

Trailhead Upgrades: I recognize there is an increasing demand for parking at the lower Junction Creek trailhead. However, expansion in the floodplain may not be desirable, and it's unclear to me how it could be expanded. Expanding the Upper Junction Creek Trailhead parking lot may be more feasible, and could allow for distribution of users. The Forest Service is not obligated to provide supply in response to increased demand for all recreational activities. The focus should be on appropriately-sited recreational opportunities of high quality that simultaneously protect wildlife habitat, watersheds, and fragile ecosystems, such as this riparian area. Signage and enforcement could be used to control overflow parking.

I favor upgrading and moving the toilet at the lower trailhead out of the floodplain.

Add ADA Opportunities: While I value ADA access, the Junction Creek trail is not an appropriate location for a trail built to ADA standards, due to its narrow and steep terrain. An ADA trail would be extremely costly and would create significant erosion potential in this area. This is also already an overused trail, and I have witnessed conflicts between bikers, hikers, and dogs. Constructing an ADA trail along Junction Creek would be expected to create significant environmental impact, potentially affecting the riparian area, water quality, and wildlife habitat, and may lead to an EIS requirement. ADA fishing piers along the Animas River Trail would make more sense for the Durango region, as there is better fishing and an already developed ADA trail there.

Streambank Rehabilitation: I support stabilizing bare and/or actively eroding stream banks along Junction Creek, and would like to see the most natural stream restoration and enhancement processes to preserve what people appreciate about this area.

Falls Creek/Hidden Valley Geographic Area

Designate System of Trails and Allowable Uses: I favor protection of historic and prehistoric properties, including decommissioning and rehabilitation of social trails.

Given the importance this area had to wildlife, I favor improved management of the meadow irrigation to provide better habitat, as natural wetlands would have existed in this area prior to the damming of Falls Creek and construction of Turner Reservoir. This geographic area includes both elk and mule deer Winter Concentration Area HPH, and Severe Winter Range HPH for elk (defined as “that part of the overall range where 90% of the individuals are located when the annual snowpack is at its maximum and/or temperatures are at a minimum in the two worst winters out of ten.”).

Social trails have developed in this area that are extensively used by hikers, dogwalkers and bikes. Even as a regular user of this area, I favor providing some restrictions on these uses to improve archaeological protection and wildlife habitat. Enforcement of dog leashing may be necessary to reduce stress on wildlife. Bikes are currently causing significant erosion on ridgetops, and this should also be addressed.

Fire Mitigation: My comments are the same as above for prescribed burning in the Junction Creek/Logchutes area, with the addition of protecting archaeological resources.

Steineger Ditch and Falls Creek Wetland Maintenance: I am generally supportive, and look forward to learning more details through the EA.

Authorization of Emergency Egress Route: I support permitted use of Forest System Road #065 for emergency evacuation use only. It should also be useable by Hidden Valley/Turtle Lake neighborhoods and other neighborhoods that might be trapped in a wildfire emergency.

Citations:

Colorado Trails with Wildlife in Mind Taskforce. (2021) Colorado's Guide to Planning Trails with Wildlife in Mind. Prepared by Wellstone Collaborative Strategies and Rocky Mountain Innovation Lab. Project supported by Colorado Parks and Wildlife in collaboration with land managers in City, County, State, and Federal government across the State of Colorado. 58pp.

Jaros, Garret, 10/27/22, Durango Herald, *Wildlife numbers on the decline in Southwest Colorado, plummeting worldwide.*

North American Bird Conservation Initiative. (2022) [State of the Birds Report: United States of America, 2022.](#)

Westveer, J., Freeman, R., McRae, I., Marconi, V., Almond, R.E.A., and Grooten, M. (2022) A Deep Dive into the Living Planet Index: A Technical Report. WWF, Gland, Switzerland.

Annotated citations on wildlife impacts from human recreation and management recommendations:

Michael J. Wisdom, et al. Elk responses to trail-based recreation on public forests. *Forest Ecology and Management* 411 (2018) 223–233. This study indicates that elk avoid trails and recreational use of trails, and that all types of recreation negatively impact wildlife. The response of elk to type of recreational use varied, and there was evidence that elk indirectly avoid the presence of trails. The mean distance of elk from trails without recreationists being present was 239-310 meters, while the mean distance of avoidance from ATVs was 879 meters, 662 meters from bicycles, 558 meters from horses, and 547 meters from hikers. CPW staff has stated this study provides the new standard they are using to measure the ‘zone of

influence' of trails. The study states: "Our results support the hypothesis that elk avoid trail-based recreation similarly to their avoidance of roads open to motorized traffic on public forests. Forest managers can use results to help optimize trade-offs between competing objectives for trail-based recreation and wildlife species like elk that are sensitive to human activities on public forests."

Audrey R. Taylor and Richard L. Knight. Wildlife Responses to Recreation and Associated Visitor Perceptions. *Ecological Applications*, 13(4), 2003, pp. 951–963. This study investigated the interactions of wildlife, hikers, and mountain bikers at Antelope Island State Park in Utah. A hidden observer using an optical rangefinder recorded bison, mule deer, and pronghorn antelope response to an assistant who hiked or biked a section of trail. The observer then measured wildlife reactions, including alert distance, flight response, flight distance, distance fled, and distance from trail. Observations revealed that 70% of animals located within 330 feet of a trail were likely to flee when a trail user passed, and that wildlife exhibited statistically similar responses to mountain biking and hiking. While Taylor and Knight found no biological justification for managing mountain biking any differently than hiking, they note that bikers cover more ground in a given time period than hikers and thus can potentially disturb more wildlife per unit time.

Leslie M. Naylor and Michael J. Wisdom. Behavioral Responses of North American Elk to Recreational Activity. *J. of Wildlife Management*, 73(3):328-338 (2009). In a controlled experiment, the behavioral changes by 13 female elk were monitored in response to four types of recreational disturbance: all-terrain vehicle riding, mountain biking, hiking, and horseback riding. Compared to control periods when elk spent most of their time feeding and resting, travel time increased in response to all recreational disturbance, but decreasing in the order listed above (i.e. ATVs eliciting the greatest travel time increase, horseback riding the least). Both mountain biking and hiking activities were found to significantly reduce resting time for elk.

David Jachowski, et al. Human Disturbance and the Physiological Response of Elk in Eastern Washington. *Wildlife Biology in Practice* 11, no. 1 (2015). Available at this [link](#).

The authors studied elk fecal glucocorticoid metabolite (FGM) levels in three different areas to compare elk living in a natural area with those exposed to human disturbance (including road networks). After accounting for seasonality and other factors, elk in more disturbed areas showed consistently higher FGM levels, suggesting they were physiologically affected by greater stress. The human-induced stress was of sufficient magnitude to exceed any season or climate-based effects.

Guillaume E. Bernard, et al. Bicycles evoke longer flight-initiation distances and higher intensity escape behavior of some birds in parks compared with pedestrians. *Landscape and Urban Planning*. Volume 178, October 2018, Pages 276-280.11 In some avian species, bicycle use evokes longer flight initiation distances and higher intensity escape behavior than pedestrian use.

Naidoo, Robin, and A. Cole Burton. Relative effects of recreational activities on a temperate terrestrial wildlife assemblage. *Conservation Science and Practice*. 2020: 2, e271, 10 pp. Camera traps were used to assess the relative effects of recreational activities and varying environmental conditions on terrestrial wildlife in British Columbia. Finer scale analysis showed that all 13 species of wildlife studied avoided humans on trails, with strongest avoidance of mountain bikes and motorized vehicles.

Colorado Parks and Wildlife (2018). Principles for Advancing Outdoor Recreation and Conservation. Available at [this link](#). CPW has adopted the seven "Principles for Advancing Outdoor Recreation and Conservation." Principle #4 states: "All recreation has impact. Coloradans have an obligation to minimize these impacts across the places they recreate and the larger landscape through ethical outdoor behavior."

Colorado Parks and Wildlife (2015). Colorado State Wildlife Action Plan. Available at this [link](#). Human intrusions and disturbance/recreational activities are listed as one of the 14 major threats to biodiversity in Colorado. Recreational use is listed as a threat to many of the species of greatest conservation need.

Colorado State Parks (1998). Planning Trails with Wildlife in Mind. Provides principles for planning trails to minimize their negative impacts on wildlife. Available at this [link](#).

Rocky Mountain Wild (2018). Principles for Trail Planning that Respects Wildlife. Available at this [link](#). There is near universal science-based agreement that both motorized and nonmotorized trails have a negative effect on habitat suitability and wildlife more generally.