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April 7, 2008

**To: San Juan National Forest Plan Revision Team**  
**Re: Comments**

Dear San Juan NF planners:

Colorado Backcountry Hunters and Anglers (CO BHA) is the state chapter of BHA, an all-volunteer, 501c(3) sportsmen's organization with members in 47 states. Our mission is to protect the ecological health of fish and wildlife habitat on public lands. Our members are motivated by a growing concern that the peace, solitude, and overall natural experience -- qualities that traditionally have made public-lands hunting and fishing in America the envy of sportsmen worldwide -- are rapidly being lost to the ever-growing pressures of human overpopulation, shortsighted politics, slap-dash extractive industry, and a wholly inappropriate and critically under-regulated motorized invasion.

The purpose of this letter is to comment in some detail -- from our collective, boots-on-the-ground experience -- on the proposed draft management plan for the San Juan National Forest. Please enter our comments, unabridged, in the official record, pass them along to decision makers, and take them into serious consideration as the process proceeds, thank you.

**Alternative B is the best choice:** Overall, CO BHA agrees with and applauds the SJNF's choice of Alternative B as the preferred plan alternative. However, we do have a few specific concerns with Alternative B as presented in the draft plan, to wit:

**Additional Wild and Scenic:** Additional streams we feel should be added to Alt. B's list of Wild & Scenic recommendations include the East and West forks of the San Juan River.

**Additional Hermosa tributary protection is needed:** Alt. B's Wild and Scenic recommendations should incorporate provisions for the long-term protection of Little Elk and Dutch Creek drainages, located in the East Hermosa Roadless area. (Table and Fig. 23, pp. 172-173, V2.) We know this landscape intimately and feel that both Little Elk and Dutch Creek drainages have attributes equal to those of Big Elk Creek, which is recommended for W&S protections. Since all three of these drainages are direct tributaries to Hermosa Creek, any disturbance or damage to *any* of the three (such as stream-bank erosion from motorized recreation or grazing, and consequent siltation) will result in subsequent sullyng of Hermosa Creek and harm to its cutthroat trout fishery and ongoing attempts to re-establish a functioning native mega-population. *To effectively protect Hermosa Creek and its exceptional native cutthroat trout fishery, all of its primary tributary drainages should be designated, at the least, as non-motorized.*

If total protection of all three of the above-named drainages is impossible, *at a minimum*, we request that the northern stretch of Dutch Creek Trail and the full length of the Little Elk Trail (FS 515), which currently is closed to motorized access, be designated *permanently* closed to motorized access. The northern portion of Dutch Creek Trail lies north of the FS Trail 516 and FS Trail 522 (Pinkerton Flagstaff) junction. These closures are essential to keep motorized use to the south and east of critical spring and summer elk calving and nursery habitat.

In sum, our primary concern with the Dutch and Little Elk drainages arises from their dark green coding on the proposed Over the Ground Travel Suitability Map for Alternative B, which categorizes them as suitable for possible motorized opening or expansion. Both of these sensitive drainages should be removed from motorized suitability status. The presume rights of motorized users to access our public lands do not include the right to go everywhere, no matter the ecological costs.

**Designate more MA1 throughout the forest, to contain disruptive and unsustainable motorized expansion:** The preferred Alternative B should include more acres designated as MA1 (Natural Processes Dominate) within roadless areas beyond recommended wilderness boundaries.

CO BHA supports the Colorado Division of Wildlife (DOW) in its stance against allowing *any* new motorized trails or roads, permanent or temporary, within any roadless area statewide. Because of its special wildlife and watershed values, we believe the east side of Hermosa Creek should be designated MA1 and kept motor-free, specifically including the Little Elk and Upper Dutch Creek trails (FS#515 and FS#516). As detailed above,

motorized access through Little Elk and Upper Dutch Creek drainages is ecologically reckless and socially unacceptable. Please consider these additional details in their behalf:

(a) The topography of the Little Elk and upper Dutch Creek trails includes ridges and open meadows, allowing motorized noise to carry significantly farther, well into adjacent primitive roadless landscapes that provide exceptional elk calving and nursery habitat. Motorized noise stresses elk (multiple studies available on request), potentially and even predictably displacing them from the quality aspen ecology they prefer and need as spring calving and summer nursery habitats.

(b) Portions of the Little Elk Trail are located *within* the creek bed. While all human traffic can be ecologically disruptive in sensitive terrains, allowing motorized use within a stream channel is far more likely to cause significant riparian and stream-bank damage and exacerbate erosion, increasing silt discharge into Hermosa Creek, negatively impacting aquatic ecology and fishing.

(c) Both Little Elk and Upper Dutch include topography allowing motorized users to travel at recklessly high speeds, creating a high potential for dangerous and otherwise incompatible encounters between motorized and muscle-powered users and wildlife.

**End livestock grazing in the upper Dutch Creek drainage.** The excessive grazing (typically described by observers as “Beat all to hell”) the upper Dutch Creek drainage area has too long suffered is incompatible with maintenance of healthy streams and downstream reproducing populations of native cutthroat trout. Further, since cattle cannot be fenced out, and the FS has no authority to require permittees to keep riders on site continually to prevent livestock from camping along the stream and denuding its riparian corridor, the best solution is to withdraw the permit for that area. From any informed and reasonable ecological point of view, far too much of the Hermosa Creek drainage is overgrazed. Further, even though it is widely allowed, livestock grazing aesthetically incompatible with wilderness values and public expectations. *Please consider withdrawing grazing permits in sensitive and abused areas such as upper Dutch and lower Relay creeks. If withdrawals are impossible, significantly reduce allotted livestock numbers.*

**All trails in the Bear Creek drainage (west of the Hermosa drainage) should be kept permanently motor-free.** The Bear Creek area comprises scenic, ecological, and wildlife attributes equivalent to Hermosa Creek. Motorized use would destroy much of its present remote charm and quality.

The Grindstone Trail is located adjacent to the proposed West Hermosa Creek Wilderness and within the Bear Creek drainage. There is no buffer zone, exacerbated by the fact that the Grindstone Trail is located on a high, open meadow above the Bear Creek drainage, allowing motor noise to carry extreme distances. Consequently, motorized use on the Grindstone Trail would seriously compromise the wilderness experience in adjacent areas encompassing the Bear Creek drainage. "Natural processes" does not include the distant discordant and disruptive drone of gasoline engines.

**Do not divide and weaken the proposed West Hermosa Creek Wilderness area for minority special interests:** CO BHA requests that SJNF protect the proposed West Hermosa Wilderness Area as an intact whole, with no mechanized corridors or nominal division into separate wilderness areas bisected by a busy bicycle trail. Contrary to claims, not other form of landscape protection equals Congressional wilderness designation, and nothing less than that is acceptable for the pristine Hermosa area. Concerning the approximately 5 miles of Colorado Trail that would be closed to bicycle use by wilderness designation, we propose the following re-route alternative: *When traveling down the CT, bikers can detour down the Hotel Draw/Scotch Creek Road (FR #550), and via the Hermosa Creek Trail (FS #514) to Durango.*

Administratively splitting this modest-sized proposed wilderness area into two smaller areas, decreasing its overall size, or allowing a mechanized travel corridor within its boundaries, will complicate and possibly confound Congressional wilderness approval. Additionally, such catering to a single user group – locally boisterous but nationally insignificant and shortsighted - - sets a dangerous precedent of favorability and vulnerability for future wilderness proposals in other forest plan revisions nationwide, encouraging the bicycle lobby (and likely, exploiting the chink in wilderness armor, the motorized lobby) to attempt further inroads to wilderness, existing and proposed. The evolving contemporary paradigm of public lands as a mechanized playground is both offensive to the majority of traditional users -- who still embrace the treasured ideals of natural landscapes, silence and natural sounds, foot-powered travel and solitude from the easy-access mobs -- even as growing motorized and mechanized use is erosive to watersheds and aquatic and wildlife habitat.

*While mechanized recreation is a bad fit for all unspoiled backcountry, it's an absolute no-fit in designated wilderness. Wilderness is for all Americans, for all time. No one user group has the right to dilute or spoil the wilderness experience for everyone else, present and future.*

Specifically concerning the negative impacts of bicycle travel on wildlife, recent studies at Teller Wildlife Research Center in Oregon (Wisdom, et al., available on request) confirm that while OHVs are far and away the most disruptive to elk equanimity, people on bicycles are second, while horseback riders and hikers are least disturbing. As with motorized travel, forest planners must consider the larger “footprint” of bicyclists in the planning process, especially for wilderness. The argument that mountain bikes did not exist when the Wilderness Act was adopted – implying that had this sport then existed, it would have been found benign and exempted from wilderness exclusion – is a candy-coated fantasy. To the contrary, the drafters of the Wilderness Act were prescient in crafting generalized, all-encompassing anti-mechanized language, clearly aware that as-yet-unknown mechanical toys and technologies will continue to evolve and, by the very nature of their modern mechanized technology, are aesthetically, spiritually, socially and ecologically incompatible with the wilderness qualities the Act establishes and America deserves.

That said, CO BHA could possibly support a redrawing of the current proposed wilderness boundaries that would accommodate the bicycle lobby’s concerns, *if* the new boundaries comprised a net gain in aquatic and wildlife habitat and watershed protection and protected acreage; that is, net gains in both quality and quantity of protection, including the inclusion of the Bear Creek drainage in wilderness, and the elimination of motorized access to such Hermosa tributary trails as Little Elk and Dutch creeks.

**Engineer Mountain, Ice Lake Basin, and contiguous areas deserve wilderness protection.** The Ice Lake, Engineer, and upper Cascade basins are brilliant examples of pristine alpine ecologies, equivalent to the best of the Weminuche high country. These alpine ecosystems are worthy of preserving in perpetuity. The area from the Colorado Trail to Highway 145 near Sheep Mountain is largely de facto wilderness and should be provided with permanent protection. South of there, from Barlow Creek to Hillside Drive, we recommend ATVs be restricted to FS roads only (no motorized trails), to preserve the natural state of the area.

**The HD Mountains comprise rare old-growth forest and essential wildlife habitat and deserve special protection:** Due to their lower elevation, classic old-growth ponderosa forests, and critical positioning and functionality as a seasonal travel corridor, the HDs provide essential habitat for sizable elk and deer herds both resident and transient, and are doubly

vital in winter. As a natural resource, from the sportsmen's point of view, keeping the HDs functioning as a healthy wildlife ecosystem in perpetuity is a battle well worth the fighting. *CO BHA encourages SJNF to take every possible measure to assure no further roading, industrial development, or motorized access in the HD Mountains IRA. Here again, our preference is permanent protection with wilderness designation for as-yet unspoiled backcountry areas.*

**Keep Animas Mountain within the Perins Peak HMA.** The draft plan takes Animas Mountain out of the Perins Peak Habitat Management Area prescription (Theme 2) and demotes it to Theme 7. This move seriously diminishes the area's wildlife emphasis and habitat effectiveness. With ever-increasing suburban sprawl and human recreation pressures (bicyclists, hikers, dog walkers, ATVs) near town, our suburban wildlife need all the year-round habitat protection they can get. *CO BHA urgently requests that the SJNF plan be amended to maintain Animas Mountain within the Perins Peak HMA prescription, rather than administratively separating it for significantly diminished protection.*

**On the northwest side of the LaPlata Range, make Bear and Ryman creeks motor-free.** Currently the first mile of Ryman Creek Trail is open to motorcycles. At that point, the trail splits into the upper and lower Ryman Creek trails, with the Upper trail open to motors all the way to FR 564. Because this little-used backcountry area harbors substantial elk populations through most seasons, CO BHA recommends that the entire Ryman Creek Trail system – from the trailhead at Hwy. 145, to FR 564 -- be made motor-free.

Travel Management documents also suggest that the first eight miles of Bear Creek Trail will remain open to motorized travel. This is a very poor choice, not only for ecological and social reasons, but due to significant safety concerns. Bear Creek is a popular day-use area for hikers, often including children, as well as for horsemen and bicyclists. This fact, combined with terrain features that often restrict sight distance, equals accidents waiting to happen. Consider this testimony from Cortez hiker and hunter Tom Sykes: "Once, while hiking Bear Creek, I heard motors coming fast up the trail toward me. I jumped off the trail just before two speeding motorcycles appeared, literally *flying* over the hill, landing right where I'd been standing just moments before. If motorized travel is allowed to continue on Bear Creek Trail, it's merely a matter of time before someone is seriously hurt."

*CO BHA asks the SJNF to coordinate the forest management and travel-management plans to prohibit future motorized travel on Bear and Ryman Creek trails.*

In closing, we trust that our members' in-depth knowledge of the San Juan NF areas, as evidenced in this document, and our devoted passion for keeping our backyard wildlands as wild and natural as possible, for *everyone* and for all time, is evident in the above comments. We are happy to supply further information on request.

Sincerely,  
David Petersen, West Slope CO BHA Co-Chair

David Lien, Front Range CO BHA Co-Chair

Pete Turner, Hermosa area habitat consultant

Tom Sykes, Ryman and Bear Creek area habitat consultant