



Friends of Allegheny Wilderness seeks to foster an appreciation of wilderness values and benefits, and to work with local communities to ensure that increased wilderness protection is a priority of the stewardship of the Allegheny National Forest.

August 15, 2016

Tracy Ridge Shared Use Trails
District Ranger Rich Hatfield
Bradford Ranger District
29 Forest Service Drive
Bradford, PA 16701

Dear Mr. Hatfield,

This comment letter from the Warren-based non-profit organization Friends of Allegheny Wilderness (FAW) is submitted in response to the proposed Tracy Ridge Shared Use Trails and Plan Amendment Project (hereinafter "the Project") outlined for the Allegheny National Forest (ANF) for the public in July 15, 2016 Scoping documents.

We will show in our letter how the Project is inappropriate, unnecessary, irresponsible, and should not go forward. The reasons include user conflicts and public safety, erosion concerns, potential disturbances to sensitive species, threats to the national treasure North Country National Scenic Trail (NCT), threats from motorized recreation on non-motorized trails, and threats to the wilderness viability of the proposed Tracy Ridge Wilderness Area.

As you know, FAW's *Citizens' Wilderness Proposal for Pennsylvania's Allegheny National Forest*, including our proposed Tracy Ridge Wilderness (pages 36 through 38), received the specific support of more than 6,800 of 8,200 public comments (greater than 80 percent) on the ANF's Draft Forest Plan during the most recent Forest Plan revision. The *Citizens Wilderness Proposal* is hereby incorporated into this comment letter in full by reference. A PDF of the document can be viewed online and downloaded here:

<http://www.pawild.org/pdfs/CitizensWildProp.pdf>

FAW and the *Citizens' Wilderness Proposal* also have the formal support of 50 local, regional, statewide, and national conservation organizations representing hundreds of thousands of Americans. Further, 70 Pennsylvania scientists with Ph.D.s in biology, forestry, ecology, economics, and related fields have formally signed on to a letter to Congress advocating for the *Citizens' Wilderness Proposal*. This science letter we incorporate in full by reference into this comment letter:

<http://www.pawild.org/pdfs/fawscienceletter1611.pdf>

It can be seen that FAW has substantial standing to comment on significant actions affecting important portions of the ANF such as Tracy Ridge.

FAW is pleased to have worked in the past with representatives of the International Mountain Bike Association, Northern Allegheny Mountain Bike Association, and Pennsylvania Kinzua Pathways. We are happy to see their long-sought plans for a state-of-the-art 40-mile-plus Epic mountain bike trail network destination in the ANF now under construction and coming closer to fruition.

FAW and our supporters are happy to endorse the Jake's Rocks Mountain Bike Trail Project. Having a high-quality, appropriately designed and engineered, environmentally-friendly destination built specifically to withstand the rigors of bicycling will benefit the mountain biking community greatly, and can contribute to helping alleviate the problem of illegal mountain bike trespass elsewhere in the ANF where the use is not allowed – such as within designated and proposed wilderness.

With regard to the current Project however, providing mountain biking opportunities in the ANF should not include expropriating the existing popular footpaths of Tracy Ridge, and in the process degrading one of last remaining wild areas of the forest. Therefore:

- The 2007 ANF Forest Plan should not be amended to allow mountain biking at Tracy Ridge.
- The 2007 ANF Forest Plan should be amended to establish the entire 9,700-acre proposed Tracy Ridge Wilderness as a Wilderness Study Area (Management Area 5.2).
- Due to the enormous, impactful scale of the proposed project, and the fact that a formal amendment to the 2007 ANF Forest Plan is being sought, a full Environmental Impact Statement in accordance with the National Environmental Policy Act of 1969 must be prepared for the Project, as opposed to the cursory Environmental Assessment that is advocated in the Scoping document.

INTRODUCTION

“Several lightly used areas would be perfect settings for mountain bike trails....But not at Tracy Ridge, nor in any designated wilderness area. Easing access into a wild area through the use of machinery immediately takes away the wild part of it. Tracy Ridge is the most logical area on the Allegheny National Forest for future wilderness designation. In its current state, it is the largest and maybe the best wild area on the ANF.”

—Mike Bleech, sportsman and *Warren Times Observer* and *Erie Times News* outdoors columnist, **Keep our wild areas wild, wilderness areas wilderness**, *Warren Times Observer*, April 9, 2016: <http://www.pawild.org/articles/wto4916.pdf>

Protecting wilderness in America's federal public lands under the Wilderness Act of 1964 is of course every bit as vital and relevant today as it was when Pennsylvania conservationists Howard Zahniser of Tionesta and The Wilderness Society, and

Representative John P. Saylor of Johnstown, shepherded the bill to fruition in the U.S. Congress more than 50 years ago, establishing America's National Wilderness Preservation System (NWPS) for present and future generations to use and enjoy. The Wilderness Act has applied to the ANF since the moment President Lyndon Johnson put pen to paper and signed this landmark legislation into law on September 3, 1964.

Efforts to see wilderness protected in Pennsylvania date back to the early 1970s when members of the Pennsylvania Chapter of the Sierra Club began researching the wilderness possibilities for the ANF. Pennsylvania Senators Hugh Scott and Richard Schweiker subsequently supported the Sierra Club's efforts by including 30,000 acres of the ANF within the Senate version of the Eastern Wilderness Areas Act of 1975, which ultimately designated more than 200,000 acres of 14 eastern national forests as part of the NWPS.

The Eastern Wilderness Areas Act legislated that "...in the more populous eastern half of the United States there is an *urgent need* to identify, study, designate, and preserve areas for addition to the National Wilderness Preservation System" [emphasis added].

One of the most notable areas that the Sierra Club identified for wilderness preservation, and that our Senators then supported, was the sprawling 9,700-acre undeveloped roadless tract located along the eastern shore of the Allegheny Reservoir known as Tracy Ridge. Cloaked by a remarkable unbroken maturing forest of hemlock, white pine, and hardwoods, it is the largest and perhaps the most obvious wilderness candidate area in the ANF. It contains dozens of miles of hiking-only trails, including a nine-mile segment of the NCT – a national scenic trail like the legendary Appalachian Trail.

Regrettably, to this day Tracy Ridge still lacks this critical level of protection that it so richly deserves. No management or developments have occurred in the area since the Sierra Club's 1973 proposal – meaning, axiomatically, that through the inevitable process of natural succession the area has grown only more wild and untrammelled in the intervening 40-plus years, and therefore nothing but increasingly qualified for wilderness designation under the Wilderness Act.

A FULL ENVIRONMENTAL IMPACT STATEMENT MUST BE PREPARED TO THOROUGHLY ANALYZE THE PROJECT

In the Scoping document under the "Preliminary Issues" header, it is advocated that a cursory "Environmental Assessment" be completed to analyze the Project. However, the law states otherwise. A full Environmental Impact Statement must be prepared. Section 6(d) of the Pennsylvania Wilderness Act of 1984, which moderately protected Tracy Ridge as part of a national recreation area, states:

"The Secretary shall prepare, and may from time to time amend, a management plan for the national recreation area. The plan may be prepared in conjunction with, or incorporated with ongoing planning for the Allegheny National Forest in accordance with the National Forest Management Act of 1976. The initial management plan and *significant amendments or revisions shall be accompanied by an environmental impact statement prepared in accordance with the National Environmental Policy Act of 1969.*" [Emphasis added.]

LACK OF INPUT FROM WILDERNESS ADVOCATES FROM THE BEGINNING

The ANF has disqualified the Project from the beginning, as no forethought has been given to any other consideration than mountain biking on the hiking-only trails of Tracy Ridge. Effectively no input from any other user groups was solicited on this project idea, just mountain bikers. It is obvious that the ANF pre-decided sometime in mid-to-late 2015 that establishing mountain biking at Tracy Ridge was to be singularly pursued.

"Twenty years ago, bikes were prohibited on the Tracy Ridge trail system. There is a thick file here – the reasons provided were user conflicts and erosion. I'm not sure that user conflict is much of an issue today – use on the trail system is fairly low. As to erosion, most of the trails are ridgetop and some were re-routed/established in the 1990s to minimize resource impacts. The reality today is that the trail system is underutilized and minimally maintained by the Forest Service. There is a bike group in Bradford that is preparing a proposal." –Personal correspondence from Bradford District Ranger Rich Hatfield to FAW executive director Kirk Johnson, informing him that the Project was underway, October 19, 2016.

Bradford District Ranger Rich Hatfield, who started in his post in early summer 2015, said that he recognized that the Tracy Ridge area, off of Rt. 321, "wasn't getting a lot of use. The trail system didn't appear to get a lot of use. Maintenance from the Forest Service was just not happening (and I) didn't see that changing any time soon. We don't maintain our trails a whole lot." With that as a background, Hatfield said he "started talking to local mountain biking groups" about "areas they're interested in." He then encouraged the groups to put together a proposal. – ANF Bradford District Ranger Rich Hatfield, Warren Times Observer, February 15, 2016

"After discussions with local mountain biking groups last year, I received a proposal to open some trails to shared use (see attached map)." –ANF Bradford District Ranger Rich Hatfield, Tracy Ridge Shared Use Trails and Plan Amendment Scoping Letter, July 15, 2016

"There's a citizens' group (FAW) that has proposed this area for wilderness, but that doesn't mean too much to us. We don't manage the land according to an advocacy groups' recommendations." – ANF Bradford District Ranger Rich Hatfield, The Bradford Era, August 6, 2016

This whole endeavor of attempting to ram through mountain biking on the Tracy Ridge trails is a waste of taxpayer dollars. With a more objective posture, including sincerely soliciting substantive input from wilderness advocates from the beginning, a more suitable, less contentious portion of the ANF than Tracy Ridge could have been identified for more mountain biking trails.

THE SCOPING DOCUMENTATION RELIES ON UNSUBSTANTIATED REASONING

In paragraph two of the July 15, 2016 Scoping letter, it is claimed that "the [Tracy Ridge] trails system is underutilized." In the third paragraph under the "Why are we proposing this project?" header of the Scoping document it is claimed that "the Tracy Ridge trails are currently underutilized." In the sixth paragraph of the Scoping document under the "Background" header, the following assertion is made, "this 34-mile hiking-only trail system is under-utilized." In the caption for Photo 3 in the Scoping document it is asserted that the photo somehow "shows minimal use." Presumably because at the

moment the photo was taken there does not happen to be a hiker on the obviously-well-worn trail within the frame.

There are no data offered to support these specious claims and they are all without merit. The claims have been fabricated because the ANF seeks to establish mountain biking at Tracy Ridge, and so must backward-engineer rationale as to why that activity is suddenly “appropriate” at Tracy Ridge. The hiking-only trails at Tracy Ridge are well-used and wildly popular.

According to the Scoping document, a primary justification for opening the hiking-only trails at Tracy Ridge to mountain biking appears to be that it would give bikers the opportunity to ride over a “rooty/rocky uneven tread.” This is dubious and unconvincing logic to use to justify the sacrifice of wilderness values at Tracy Ridge and the degradation of this special Keystone State wildland.

In the first paragraph of the Scoping document, it is claimed (and repeated elsewhere in the Scoping document) that “mountain biking has very limited trail options available on the Forest,” yet the next paragraph proceeds to detail more than 100 miles of trails available for mountain biking at Rocky Gap, Willow Creek, Morrison, Tanbark, and Hearts Content. (The Marienville and Timberline ATV trails were left out.) All of these trails have roots and rocks to ride over. It’s a forest. Roots and rocks are ubiquitous.

The next paragraph of the Scoping document discusses the aforementioned actively under construction, and soon to be open state-of-the-art 40-mile-plus Jakes Rocks Epic Mountain Bike trail. Also, there are thousands of miles of logging roads spider-webbing across the ANF that are available for mountain biking. There is not even the smallest kernel of truth to the assertion that mountain biking has limited trail options on the ANF. There is no need to open the hiking-only trails at Tracy Ridge to mountain biking.

THE QUESTION OF MOUNTAIN BIKING AT TRACY RIDGE HAS ALREADY BEEN DECIDED
In 1993, ANF personnel embarked on a major trail analysis for Tracy Ridge to determine which trails could be upgraded, and, importantly, it was also asked whether mountain biking should be allowed in the area. During the subsequent public comment period, essentially everyone who wrote in supported the ANF’s efforts to maintain the Tracy Ridge hiking-only trail system – including the NCT – for hiking use only. All of the major hiking groups opposed mountain bike use in the area.

The ANF agreed with the abundant public comment that they received on this project, and ruled mountain biking on the Tracy Ridge hiking-only trails untenable:

<http://www.pawild.org/pdfs/TracyRidgeDecisionMemo61094.pdf>

ANF Bradford District Ranger Stanley Kobielsky wrote in his June 10, 1994 decision notice (linked to above and incorporated in to this comment letter in full by reference) that the “soils and topographic conditions of the area will not support equestrian and mountain bike use...the channeling effects of tire tracks would create additional erosion problems. These effects could be mitigated but not without extensive shoring up of our sideslopes and hardening of the tread with additional surfacing material. These actions would be expensive, are likely to change the character of certain trail segments, and

would add additional maintenance costs to the system. I also believe that adding...mountain bike use to the existing trail system would increase the number of user contacts, which in turn, would adversely effect the Recreation Opportunity Spectrum, (ROS), class of semi-primitive non-motorized, (SPNM). Such changes would not be acceptable. Based on these factors, equestrian and mountain bike use will be prohibited on designated trails within...Tracy Ridge."

As was well-documented in 1994, mountain biking at Tracy Ridge was unacceptable then, and the same is true today. Nothing has changed in that regard. To suddenly suggest anything differently is arbitrary and capricious.

TRACY RIDGE IS QUALIFIED FOR WILDERNESS PROTECTION, IPSO FACTO THE ANF'S RESPONSIBILITY IS TO PROTECT IT AS SUCH

When the ANF published the draft version of their Forest Plan in 2006, naturally, Tracy Ridge was found to be highly qualified for wilderness designation. Tracy Ridge was included in the preferred alternative ("Alternative C") of the Draft Forest Plan as a recommended wilderness area.

<http://www.pawild.org/pdfs/TracyRidgeEvaluation2006.pdf>

Relevant observations and superlatives formally documented about Tracy Ridge by ANF personnel in their wilderness evaluation document (linked to above and incorporated in to this comment letter in full by reference) then included:

"The majority of the area appears natural and untrammled."

"There are approximately 31 miles of hiking trails which include the North Country National Scenic Trail and the Tracy Ridge trail system. Approximately 5 miles of the Tracy Ridge trail are also a designated National Recreation Trail."

"The Tracy Ridge area is entirely forested and all forest is considered mature or greater than 50 years of age."

"Mountain bike use on designated trails within the area is prohibited as per Forest Supervisor closure order."

"Two types of trail users can be found, the long distance hiker or backpacker which hikes between trailhead locations and may camp along the way, and the day-use hiker who hikes a portion of a trail to access the Reservoir, a vista or one of the boat-to campgrounds."

"Tracy Ridge is characterized by steep rugged terrain leading to high plateau uplands set in a wooded landscape intermixed with streams and continuous forest cover."

"The scenic integrity of Tracy Ridge is high."

"The area has a large component of late successional forest habitat, especially in comparison to the remaining Forest which reflects the high importance of Tracy Ridge in achieving habitat conservation goals for a variety of wildlife including neotropical birds as well as less mobile species such as reptiles, amphibians and small mammals."

"The most significant characteristic of the Tracy Ridge area lies in the predominance of mature forest conditions, combined with the remote, undisturbed nature of the area."

"Tracy Ridge provides optimum habitat conditions for species that are sensitive to human disturbance, as well as species that require large blocks of mature forest habitat such as the bald eagle, great blue heron, red-shouldered hawk, black bear, northern goshawk and bobcat."

"Due to the proximity to the Allegheny Reservoir, the remote nature of the area and the presence of superior white pine trees that are preferred for nesting, the Tracy Ridge area provides some of the most desirable bald eagle nesting habitat in the Forest."

*"Tracy Ridge is considered occupied Indiana bat habitat. The bald eagle (*Haliaeetus leucocephalus*) also occurs within the Tracy Ridge area....eagles have been observed roosting along the western boundary of the area adjacent to the Allegheny Reservoir. Suitable habitat for the Northern long-eared bat (*Motis septentrionalis*) occurs throughout the Tracy Ridge area."*

"Designation as wilderness would benefit those species seeking remote, undisturbed habitats and those that benefit from a mature, continuous forest."

"There is a mix of opportunity for solitude and serenity, self-reliance, adventure, challenging experiences, and primitive recreation in Tracy Ridge."

"Tracy Ridge has high potential to provide the wilderness attributes and values appropriate for wilderness designation."

"There are few places on the Forest that offer as high quality scenery, natural integrity and wide scale ecosystem function as Tracy Ridge. The presence of a significant old tree component enhances the scenic quality of the area for potential wilderness."

In the final Forest Plan published in March of 2007, however, to the surprise and chagrin of most wilderness consideration for Tracy Ridge had been arbitrarily and capriciously removed by the Regional Forester in Milwaukee, Wisconsin, Randy Moore, who had never set foot in the Tracy Ridge area. He made his decision not because Tracy Ridge is not qualified for wilderness designation (it is), but simply because some special interests wanted to retain the possibility of establishing uses in the area that are not consistent with wilderness designation, such as developed recreation.

On page 18 of the 2007 Allegheny National Forest Land and Resource Management Plan Record of Decision document, Mr. Moore wrote *"Although initially proposed for wilderness study in the DEIS, I have listened to local publics and heard their concerns for maintaining quality recreation opportunities along the Allegheny Reservoir. I heard a great deal of concern that the designation of wilderness might limit trail development, boating opportunities, and the possible development of overnight facilities. The ability to use prescribed fire to regenerate oak forest within this area was also an issue raised by ANF staff and the public, and wilderness designation would greatly restrict or prohibit the use of that tool."*

This is the epitome of arbitrary and capricious reasoning. It is not the agency's role to decide whether wilderness designation is "appropriate" for wilderness-quality lands under their stewardship. Rather, if an area such as Tracy Ridge qualifies, then wilderness protection is automatically appropriate, and the agency is charged with protecting and managing the area as wilderness. That is what was intended by Zahniser, Saylor, and additional framers of the Wilderness Act – the law was actually meant to be *implemented*. Imagine that!

The Scoping letter states that Tracy Ridge "is not designated as wilderness nor is the area a Forest Service wilderness study area." While true, the statement by itself is also intentionally intellectually dishonest in that it could leave the reader with the impression that Tracy Ridge is *not qualified* for wilderness protection under the Wilderness Act of 1964. Everybody, including all staff at the ANF and all staff in the Regional office in Milwaukee, knows that Tracy Ridge is eminently qualified for inclusion in America's National Wilderness Preservation System.

This is the only test that matters – is the area qualified for wilderness designation? If yes then *ipso facto* the agency's sole responsibility is to advocate for such, as opposed to going around asking questions like "is there anybody who would like to do something different at Tracy Ridge besides have it designated wilderness? What kind of developments would you like to see?" Such a posture represents an abdication of the agency's responsibility to implement the Wilderness Act, the Eastern Wilderness Areas Act, and many other federal statutes relevant to protecting wilderness on qualifying national forest lands.

Once mountain biking is permanently established in this area, achieving wilderness designation for Tracy Ridge would become that much more difficult as bicycling is correctly not allowed in wilderness. Perhaps the knowledge of this fact provides some motivation – as an end in itself – for some at the ANF in seeking to implement the Project at Tracy Ridge? Because the area qualifies, the 2007 ANF Forest Plan should be amended to establish the entire 9,700-acre proposed Tracy Ridge Wilderness as a Wilderness Study Area (Management Area 5.2).

SENSITIVE SPECIES

As formally documented in the aforementioned 2006 Tracy Ridge wilderness evaluation, Tracy Ridge "...has a large component of late successional forest habitat, especially in comparison to the remaining Forest which reflects the high importance of Tracy Ridge in achieving habitat conservation goals for a variety of wildlife including neotropical birds as well as less mobile species such as reptiles, amphibians and small mammals."

The evaluation goes on to document the fact that Tracy Ridge provides high quality habitat for the federally endangered Indiana bat (*Myotis sodalis*), bald eagles (*Haliaeetus leucocephalus*), northern long-ear bats (*Myotis septentrionalis*), great blue herons (*Ardea herodias*), red-shouldered hawks (*Buteo lineatus*), black bears (*Ursus americanus*), northern goshawks (*Accipiter gentilis*), and bobcats (*Lynx rufus*).

In addition, the 2007 ANF Forest Plan states that essentially the entire ANF could potentially contain habitat for the federally endangered small whorled pogonia (*Isotria*

medeoloides): "...small whorled pogonia is present, but populations have not been documented on the ANF" (page 3 of Appendix B of the Forest Plan).

The Environmental Impact Statement prepared for the Project must consider in detail potential impacts to all of the above listed species at Tracy Ridge, and many others, including a wide variety of neotropical migratory songbirds. Potential impacts to all threatened, endangered, sensitive, and other species must be fully analyzed.

THE NORTH COUNTRY NATIONAL SCENIC TRAIL

The NCT is a 4,600-mile non-motorized foot-traffic-only trail beloved by thousands. As shown, entertaining any mountain biking at all for the trails at Tracy Ridge is inappropriate on its face. Such a radical change in policy at Tracy Ridge would represent a perpetual threat to the integrity of the nine-mile segment of the NCT there. Most NCT enthusiasts wish to perpetuate the unique, remote, undeveloped character of the entire Tracy Ridge area, not see it opened up to new, incompatible uses.

The mountain bikers' proposal openly states "we would like to see all of the trails at Tracy Ridge eventually opened to bicycle use."

<http://www.pawild.org/pdfs/WNYMBA103015.pdf>

We suggest they be taken their word (their above linked-to letter is hereby incorporated in full by reference in this comment letter). Further, the Tracy Ridge trail system, including the NCT, is interconnected. There will be perpetual mountain bike trespass on the NCT at Tracy Ridge should that activity be formally established anywhere in the area – whether it is "against the rules" to ride on the NCT or not. Whether rocks, barricades, signs, or other forms of discouragement to riding on the NCT are posted at NCT intersections or not.

Some mountain bikers will continue riding beyond the three locations on the Scoping document map labeled "No Bicycles Beyond This Point" – including onto the NCT. To imply otherwise is naïve. On the Johnnycake Trail in particular, the lure of riding down to the water's edge at the Allegheny Reservoir will be too great for too many (one is too many). There's no plan for how to address those who will cavalierly disobey such signs. It won't be everyone, but there will be some, and where some go others will follow. It is axiomatic that it would be better for the NCT at Tracy Ridge if there was no mountain biking allowed anywhere within this area than if there is "limited" mountain biking established in parts of the area.

In the aforementioned 1993 trail analysis for Tracy Ridge, essentially everyone who wrote in supported the Forest Service's efforts to maintain the Tracy Ridge hiking-only trail system – including the NCT – for hiking use only. All of the major hiking groups opposed mountain bike use in the area. See below for examples.

Allegheny Outdoor Club:

Donald Dorn (Also a member of the Board of Directors for the North Country Trail Association)

<http://www.pawild.org/pdfs/DonaldDornTracyRidge102093.pdf>

"I agree that these trails should be designated for pedestrian use only....on the steep slopes existing in this area horses and bikes will cause accelerated erosion....[and] can quickly turn parts of the walking tread to a muddy quagmire."

Merl Caldwell

<http://www.pawild.org/pdfs/MerlCaldwellTracyRidge11393.pdf>

"Restricting mountain bike and horse use is a good idea. The area is too wet. The Allegheny Outdoor Club has been talking -- consider these comments as being from the Club."

AOC Vice-President Marcia Ziki

<http://www.pawild.org/pdfs/MarciZikiTracyRidge111693.pdf>

"I would strongly urge you not to consider allowing use of the trail by mountain bikes or horses. I have hiked on sections of the North Country Trail near Kelletville which have been nearly destroyed."

Keystone Trails Association:

Hugh Downing

<http://www.pawild.org/pdfs/HughDowningTracyRidge102593.pdf>

"I especially support your proposal to exclude mountain bike use of the trails in this area for the reasons that you set forth plus the concerns for safety that would arise with bicycles using what are already high-traffic foot trails. There would be inevitable physical contact and possible injuries....There are numerous forest roads within the ANF suitable for bicycle use. Please keep them off the hiking trails."

Thomas Thwaites

<http://www.pawild.org/pdfs/ThomasThwaitesTracyRidge103093.pdf>

"There must be hundreds of miles of forestry roads in the ANF and bicycles...should be restricted to them. By the time you've hardened a [hiking] trail to withstand such use, you have turned it into a road."

Hugh Downing

<http://www.pawild.org/pdfs/HughDowningTracyRidge61994.pdf>

"I'm in full support of your proposals, especially the decision to exclude equestrian and mountain bike use on these trails. I'm sure you'll receive complaints, but I'm also sure that there are other areas of the Forest where their presence would be acceptable."

North Country Trail Association:

NCTA Executive Director Patricia Allen

<http://www.pawild.org/pdfs/TracyRidgeNCTA1993.pdf>

"We sincerely appreciate your efforts to upgrade the trail and for designation of the section for hiking use only. This is consistent with our efforts to assure that trails for

hiking be built and maintained so that they will not need constant repair due to erosion.”

NCTA Board of Directors Member Glenn Oster

<http://www.pawild.org/pdfs/GlennOsterTracyRidge102793.pdf>

“You stated that bicycles and horses will not be permitted on the Tracy Ridge, Johnnycake and North Country Trails....I sincerely hope that you continue to maintain that position. Mountain bikes...do a great deal of damage to hiking trails....In addition to trail damage, we also encounter trail use conflicts...trail bikers get psyched up by the challenge of terrain and ride dangerously fast. The encounters are not pleasant....I know I express the sentiments of most hikers in the following organizations in which I am active: American Hiking Society, American Youth Hostels, Appalachian Trail Conference, North Country Trail Association.”

Warren, Pennsylvania Resident John McKown:

<http://www.pawild.org/pdfs/JohnMcKownTracyRidge112194.pdf>

“Tracy Ridge ain’t broke, so don't try to fix it. I suggest that you use your resources in other locations to restore the forest to a more natural condition – like road obliteration, OGM debris removal...”

The nine-mile portion of the NCT in the proposed Tracy Ridge Wilderness Area is one of the premier sections of the entire 4,600-mile trail, not only for the stark untrammelled beauty of Tracy Ridge, but also because of the extensive Tracy Ridge trail system with dozens of miles of hiking-only trails linking to the NCT within the area that hikers utilize for side trips. The Project would effectively strip NCT aficionados of the exceedingly rare opportunity to explore side trips from the NCT on a fine network of hiking-only trails in an untrammelled wilderness environment.

Wilderness along the NCT is a rare commodity indeed, especially as compared to other national scenic trails across the country. The Appalachian Trail passes through 26 federal wilderness areas, the Continental Divide Trail passes through 20 federal wilderness areas, and the Pacific Crest Trail passes through 48 federal wilderness areas. However, so far the NCT only has five federal wilderness areas along its entire length – the Boundary Waters Canoe Wilderness in Minnesota, the Rainbow Lake and Porcupine Lake Wilderness Areas in Wisconsin, and the McCormick and Beaver Basin Wilderness Areas in Michigan. To squander one of the last best opportunities in America to protect wilderness along the NCT at Tracy Ridge, for the sake of opening the area to mountain biking when that activity isn’t even needed there would be beyond shortsighted.

The Environmental Impact Statement prepared for the Project must fully analyze all potential impacts over time to the nationally-recognized treasure NCT, and the inevitable, perpetual mountain bike trespass that will occur on the NCT.

MOTORIZED MOUNTAIN BIKES

The phenomenon of motorized mountain biking is growing rapidly. Please see the below examples substantiating this observation, and give careful thought to the implications for the ANF.

https://www.youtube.com/watch?v=Nk5ZkY2n_sY

E-bikes - Fad Or Future?

"We definitely saw a lot of e-bikes popping up. We even saw the first e-bike mountain bike race. *They look exactly like mountain bikes, but with an electric assist motor.*"

"I could see where this [mountain bikes having motors] could be a big change eventually."

"I do see us starting to follow the same trends that have happened in Europe. In the last five years the e-mountain bike scene has really taken off across Europe. We're starting to see those same kinds of indicators here in the U.S."

"We're working to gain more trail access for e-mountain bikers...and give them access to trails that they may not have had access to before."

<https://www.electricbike.com/stealth/>

Stealthy Electric Bikes; For the Discreet and the Cheaters

"In the name of discretion, for those who do not want to stick out when you ride your E-bike, here are the motor kit set ups that are least likely to make you a sore toe while you are among your pedaling counterparts. *If you have a desire to be stealthy on your E-bike you are not alone.*"

<http://www.outsideonline.com/2090891/electric-mountain-bike-will-make-you-believer>

This Electric Mountain Bike Will Make You a Believer

With Specialized's new Turbo Levo FSR Comp 6Fattie, the e-mountain bike has finally come of age

Outside Magazine, June 15, 2016

"So it's a trail bike at heart. Just one with electric benefits. *Aside from the glowing green LEDs indicating charge levels and output settings, there is little indicating this Turbo is anything but a typical mountain bike.*"

With the advent and exploding growth in popularity of motorized mountain bikes, this even further eliminates the possibility of allowing mountain biking on the non-motorized Tracy Ridge trails (and therefore trespass on the NCT). Because it is nearly impossible to distinguish stealth motorized mountain bikes from traditional mountain bikes, allowing mountain biking is tantamount to allowing motorcycles and four-wheelers on the Tracy Ridge trails – motorized is motorized, electric-assist motorized mountain bikes do not get a free pass. They are motorized vehicles. There is no other possible interpretation. The skyrocketing growth in recreating with motorized mountain bikes and their inevitable use on the hiking-only trails at Tracy Ridge cannot be ignored when performing an Environmental Impact Statement for the Project.

PUBLIC SAFETY

On October 25, 1993, High Downing of the Keystone Trails Association wrote to the ANF: "I especially support your proposal to exclude mountain bike use of the trails in this area for the reasons that you set forth plus the concerns for safety that would arise

with bicycles using what are already high-traffic foot trails. There would be inevitable physical contact and possible injuries...”

<http://www.pawild.org/pdfs/HughDowningTracyRidge102593.pdf>

On October 27, 1993, North Country Trail Association board of directors representative Glenn Oster wrote to the ANF: “You stated that bicycles and horses will not be permitted on the Tracy Ridge, Johnnycake and North Country Trails....I sincerely hope that you continue to maintain that position....In addition to trail damage, we also encounter trail use conflicts...trail bikers get psyched up by the challenge of terrain and ride dangerously fast. The encounters are not pleasant....I know I express the sentiments of most hikers in the following organizations in which I am active: American Hiking Society, American Youth Hostels, Appalachian Trail Conference, North Country Trail Association.”

<http://www.pawild.org/pdfs/GlennOsterTracyRidge102793.pdf>

See also these two recent examples:

<http://www.marinij.com/article/NO/20150227/NEWS/150229813>

Hiker treated for injuries after confrontation with mountain biker in Terra Linda open space

February 27, 2015

<http://danvillesanramon.com/news/2015/06/17/hiker-injured-in-crash-with-cyclist-on-trail-near-danville>

Hiker injured in crash with cyclist on trail near Danville

June 17, 2015

The Scoping document states under the “Why are we proposing the project?” header that “non-motorized bike use of ATV trails during the ATV season is permitted but is not considered a desirable non-motorized bike experience.” Why? Presumably, bicyclists do not wish to be in the middle of their ride with friends and family only to have several ATVs suddenly rounding a bend and bearing down on them. It is not desirable because the two uses conflict — just as allowing mountain biking on the footpaths of Tracy Ridge would inevitably lead to problems and user conflicts, as formally documented by ANF Bradford District Ranger Stanley Kobielsky in his aforementioned June 10, 1994 decision notice. No backcountry hiker wants to be in the middle of their hike with their young vulnerable children, enjoying the serenity and solitude of Tracy Ridge, only to have several mountain bikers rounding a bend and bearing rapidly down on them.

Advocating that mountain bikes have access to the hiking-only trails at Tracy Ridge is an irresponsible threat to public safety. The Environmental Impact Statement for the Project must fully analyze potential user conflicts and threats of harm to hikers from the “shared use” of having to contend with mountain bikers on historically hiking-only trails.

PERMANENT CLOSURE AND REHABILITATION OF TRACY RIDGE CAMPGROUND LOOPS

Our final comment is not directly related to mountain biking at Tracy Ridge, but it is a good idea nonetheless, and the ANF should implement it as soon as possible. In the

"Background" section of the Scoping document, it is stated that "use of the [Tracy Ridge] campground is quite low - occupancy of the 100+ site campground is rarely above 10%." In light of this, we recommend that the three western-most loops of the Tracy Ridge campground shown on this map be closed:

http://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5052734.pdf

This would be the loops with sites 1-23, 71-91, and 92-119 shown on the map. These three loops should be permanently closed, all picnic tables and fire rings, etc. removed, bathroom buildings demolished, access roads and parking pads at each site obliterated and replanted with native vegetation, and the acreage formerly occupied by these three loops should subsequently be incorporated into the proposed Tracy Ridge Wilderness Area as MA 5.2. acreage, thus helping to increase the overall ecological integrity of the prospective designated wilderness. This action would also cut down on maintenance costs for the Tracy Ridge campground in general.

There are many fine examples of deliberate road obliteration and ecological restoration such as the above described being performed elsewhere around the ANF in recent years. A particularly fine example of which is the recent Forest Road 139 obliteration in the Bradford Ranger District, in Sheffield Township. Native grasses and woody vegetation were planted, rocks, boulders, and coarse woody debris were placed along the old roadbed, etc., such that the segment of Forest Road 139 in question may never be used as a road again by anyone for any purpose.

Thank you very much for your time and consideration, please do not hesitate to contact any of us at FAW if you have any questions or would like additional information.

Sincerely,



Kirk Johnson
Executive Director

Cc: Grant B. MacIntyre, Director, University of Pittsburgh Environmental Law Clinic