Comments for Sand Lake Phase 2 Draft Decision Notice -

In December of 2020, I submitted a series of comments to USFS (Included below for reference) outlining areas of concern with the recreational aspect of the project as presented in the draft EA, pointing out that there were a number of areas not covered by the document related to impacts resulting from increased recreational use. The omission of these details made it difficult to assess how such a proposal might impact the surrounding lands and communities.

Since that time, I’ve reviewed the updated documents and I’ve had a number of interactions with the staff at the Hebo Ranger District to discuss these concerns and the plans to ameliorate them, and to the credit of all involved, each has been addressed to a large degree.

The Hebo Ranger District has stated that the primary user group, TORTA, will be required to develop and abide by a maintenance and operations plan for trail and facilities upkeep, and there are indications that they will coordinate periodic clean-ups of the neighboring forests. In addition, the USFS has stated that the planned signage directing recreational users to the trail system will route people to the 1106 road as opposed to the 1004 road. With respect to law enforcement and nuisance issues, the USFS has stated that a new, federal law enforcement officer has been assigned to the local Siuslaw forest, and future plans have that officer patrolling the recreational area.

However, there are a few issues that continue to give me pause.

First, the maintenance and operations plan outlining the upkeep responsibilities of the primary user group has not yet been finalized, so no assessment of its adequacy or proportionality can yet be made.

Second, all impact assessments and remedies are based on user estimates that are significantly lower than those initially, but informally, estimated by the USFS. While it’s not possible to know how popular the trail system could become, if usage trends toward the numbers originally estimated (60,000 visits a year), impacts previously noted as concerning and subsequently assessed as minimal in the reports could become problematic. Under such a scenario, upwards of 200 additional vehicles a day could be accessing the trail system through the 1004 road during peak seasons, especially once users realize that access via the 1004 road is significantly shorter and more convenient than through the 1106 access road. With so many visitors, an increase in dispersed camping in already marginal sites, as well as the attendant risk of wildfires also become more of a concern.

Added traffic of this magnitude would also introduce regular traffic conflicts on the lower portion of 1004, a one lane road crossing private property, where illegal parking, gate blocking, and vehicular trespass occur regularly. In addition to the noise, dust and traffic conflicts, the incidence of vandalism, trespass, litter, and other violations would almost certainly increase as well, issues already present with far less traffic. Routing such traffic off of and onto Sandlake Rd. at its junction with 1004 will also likely exacerbate already present risks to other vehicles, cyclists, and pedestrians.

My general position on this project has been and continues to be that as long as the impacts from recreational use are remedied, and that planning is in place to adapt those remedies to ever increasing usage so the burden does not fall on those who live in the neighboring areas, then I don’t have any objection. However, as noted above, it is still not clear that such plans exist, therefore I must lodge an objection to this decision. If, through continued interaction with the USFS such plans become evident, I have no issue withdrawing my objection.

**For Reference Only – Previously Submitted 12/22/2020**

**PUBLIC COMMENTS – MULTI-USE TRAIL SYSTEM**

1. EA Lacking Information Regarding Expected Impacts of New Recreational Users –
	1. The EA lacks detail regarding expectation of recreational use to allow a reasonable assessment of impacts by public
		1. No estimated user numbers
			1. Also, no estimate of how use might be concentrated during specific times of the year
		2. No assessment of environmental impact of said users
2. No comment in EA related to enforcement of use restrictions (such as no camping, illegal parking, etc..) The lower part of USFS 1004 has repeatedly been subject to criminal activity and nuisance behavior, all of which is likely to be exacerbated by increased use. No mitigation plan discussed in EA.
	1. Issues experienced in the last 5 years include –
		1. Litter & illegal dumping
		2. Illegal parking – blocking gates and pulling off onto private property
		3. Drunk driving
		4. Vandalism
		5. Trespass
		6. Burglary
		7. Bank robbery suspects crashed and exchanged gunfire with State Police on lower corner of 1004 (still on my property – in my backyard)
	2. USFS (Siuslaw) does not have law enforcement on staff
	3. Tillamook county in general lacks enforcement capabilities for recreational impacts, especially in the local area
		1. Rulemaking ongoing to limit vehicle use on South County beaches – primarily due to lack of enforcement capability of illegal camping
		2. There is no enforcement of restrictions on noise, curfew, drag racing, etc.. at Sandlake ATV site. If law enforcement fails to deal effectively with violations (noise) at Sandlake ATV site that impact the entire Sandlake and Tierra Del Mar Communities, then it is unlikely there will be an effort to enforce restrictions on new trail system.
		3. Lack of enforcement in the 1004 area has already led to events noted above with limited user base
3. EA States all Easements Have Been Verified –
	1. Easement across 24415 Sandlake RD is not adequate. USFS does not have legal access across subject property to USFS lands
4. Increased use of USFS 1004 at Sandlake Rd increases traffic issues at junction
	1. The straight section of Sandlake Rd at USFS 1004 junction regularly experiences speed limit violations (45 mph posted) and highspeed passing. Turing onto Sandlake from 1004 during high use periods poses risks to vehicles and pedestrians and will be exacerbated by an increasing recreational user base.
5. No statement in EA regarding potential for increased wildfire risk resulting from recreational use.
	1. According to the EA, camping will not be allowed in new trailhead/parking areas, but there are only a few dispersed camp sites in the area.
		1. Increased user base with few available campsites will likely push users to more marginal sites, a situation likely to be exacerbated by beach access closures and the general increase in tourism.
		2. Wildfire risk due to increased camping in marginal locations not addressed.
6. Lack of hiking community involvement
	1. The new trail system was developed with limited stakeholders. Trailkeepers of Oregon (TKO) and other hiker advocates were not involved in early planning discussions, TKO only got involved once it was too late to have a voice in formulating hiker specific trails.