

Hello,

I am an Oregon resident who enjoys occasional hikes in various National Forests, including the Ochoco NF. I am also a natural resource science, policy, and management professional, who worked in the USFS NFS and R&D offices in the Pacific Northwest and in Washington D.C.. My background also includes Migratory Bird science and management in USGS and USFWS. The following is a list of points I'd like you to consider:

Impacts of existing mountain biking, hiking, and horse-riding usage of trails can include: soil erosion and compaction, litter, canine, human, and horse feces, invasive plants, and wildlife habitat degradation and fragmentation, and visual and auditory disturbance to wildlife behavior. During my tenure in R&D, a nationwide team of Regional Wildlife Program Managers asked for a synthesis document to help them assess and minimize the negative impacts of recreation on wildlife and wildlife habitat. These Wildlife Program Managers were struggling with sustaining wildlife habitat in the face of escalating recreation pressures was among the top concerns. My team provided the National Forest System (NFS) the service of distilling dozens or hundreds of documents on "recreation and wildlife" into one succinct summary for their use. I provide the reference for you at the bottom of my letter.

If the purpose of the Corral Flats project is to wisely steward the land where miles of equestrian trails already exist, and to restore areas where equestrian trails and motorized vehicles damaged the land, then I applaud that intent. Meadows, forests, soils, and wildlife must be protected by law. But upon closer look, I'm not convinced that we will see those results.

Before I comment on the EA, you know OHV resource damage and closed road use violations (noted in the Draft EA) have been taking place, and we know violations are not an issue in the realm of NEPA. USFS has the responsibility to act on violations and you have the authority to do so. This is an education and enforcement, not a NEPA, issue.

Overall, the EA reads as incomplete or unfinished. Just generally, it shows you are not considering an array of alternatives; just two. After producing analysis that clearly describes negative impacts to wildlife, it is inexplicable to me why you would not propose at least one, but better yet, two different alternatives that attempts to minimize and eliminate those impacts while still addressing trail management issues. Given the impacts to natural areas and wildlife you described, I would also expect one alternative that puts sensitive and limited forest types, meadows, soils, and wildlife as the driver, as opposed to equestrian trails. This EA has the appearance of happening in a pre-decisional environment; that the choice is between status quo or a slight improvement to resource management. To return to the intent of NEPA, I suggest you need at least 2 additional proposed alternatives and

analyses, and suggest you postpone this effort until after bringing 2 or 3 more alternatives into this mix to evaluate the positive and negative impacts to recreation, wildlife, and all other resource objectives.

I see two more reasons to postpone and re-do this EA: 1) an analysis of impacts with the No Action alternative is not provided. Given trail use is currently authorized, there is “action” and you must analyze that situation in the same way you analyze “Action” alternatives, and 2) Late in the document you reveal the idea of adding 20 miles of new trails. Why is that not disclosed up front? This surprise announcement needs to be fixed by incorporating it at the start and addressing it throughout.

The idea of adding 20 miles more trail through currently unfragmented habitat, is astounding. Surely you have heard the widespread outcries among natural resource professionals and conservation organizations about the impacts of dissecting habitat in this 21st century world of foregone land management options that has now left nature with very limited options to survive and continue. Two basic principles of addressing current wildlife population declines while managing for recreation is to: 1) prevent further fragmentation and 2) prevent further disturbance. I ask that you reject this notion of adding so many miles of new trails. Instead, look to roads located in areas that would support less biodiversity. Restoring abandoned roads back to forest and meadow habitat would be best for wildlife, but converting abandoned roads to trails is better than allowing more damage to areas where plant and animal diversity live now or used to live and could once again, thrive. Abandoned logging roads are wide enough to horse, bike, and foot traffic at once, helping to reduce conflicts among user-types. This is not the 1970s anymore. Options we had are gone. Oregon’s biodiversity is in peril. When you already have hundreds of miles of trail, and you have wildlife declining and in need of more unfragmented habitat, the answer is to manage the people, not degrade the land. It worked on the Deschutes NF with Wilderness Permits. They could have allowed the public to keep flowing into sensitive areas, degrading the resources so as not to upset some people. As it turns out, people can learn. People can accept and even appreciate rules as they too can have a higher quality experience. Try that approach please before degrading this landscape further.

The EA indicates a belief that people won’t come this far to the trails in the Ochocos: *“Due to the distance from town and long-distance nature of the network, we expect users would continue to see minimal to no use by bikers and/or hikers.”* It appears you have not heard that due to the high congestion of bikers and hikers on the Deschutes NF, many people are looking to shift their play time to the Ochoco NF. I’m not sure which “town” you are referring to, but I’m referring to Bend, though Portlanders are also branching out. Some influencers are even encouraging it because the numbers of users on the Deschutes are impacting the environment and the experience. So, they are coming. They are likely already there. Some

trail cams will show you how deep into the forest they are going. I suggest reconsidering all alternatives with the idea that yes, bikers and hikers throughout the Ochocos will be increasing in number annually.

The EA refers to trails across nearly 40,000 acres. I could not discern impacts to resources at a site level, so question if the staff could, at the level of detail necessary for a reliable assessment of impacts. How could anyone ground truth at this huge scale? There are no maps provided showing the differences between alternatives. I also didn't see data in a format where we can compare numbers of miles of trail among the alternatives, including new, decommissioned, and remaining trails.

When it comes to the intent of NEPA and NFMPA and the principles of Gifford and Teddy, here is the problem with the 2 alternatives: More fragmentation is harmful to sustaining wildlife. Recreation can have minimal impacts but not if habitat quantity and quality is diminished, or disturbance is accelerated, to the point where individuals cannot survive and reproduce, and populations can't be sustained. Research shows visual and auditory human disturbance increases energy expenditure for wildlife as they must move more frequently and this can affect their reproductive success. Imagine having to move every time you are trying to eat or rest, all day, day after day. I ask the resource managers to examine existing trails located in ecologically highly vulnerable areas, especially in the late successional, thermal cover, riparian, and meadow areas. In these types of locations, we can expect important habitats for wildlife including: pine marten, wolverine, pollinators, birds, wildflowers, mule deer, and elk to be impacted, negatively by trails. I would suggest eliminating trails from those valuable and vulnerable areas to reduce not only habitat degradation, but disturbance. These areas need to be restored back to ecological function and protected from increased human activity.

Given the dramatic declines of North American bird populations in recent years, and the importance of forests for migratory birds using the Ochoco for breeding habitat, I am most disturbed by the lack of attention to this national concern. In our region, several western forest birds are species of concern. The EA document states: "*Project activities will designate an existing trail system which occurs within or in close to proximity to multiple habitat types including dry forest, mesic mixed conifer, riparian woodland, and meadow species of migratory and resident birds which utilize these habitats may be adversely impacted due to an increase in the overall level of disturbance within the area associated with use of the trail system.*" Breeding habitat for birds necessitates quality habitat, and lack of human disturbance. The USFS has a responsibility to migratory birds, as you referenced, to reduce the impacts of recreation on these declining migratory birds. All these important stands, including late successional forests, are limited, and so in my view should be off the table completely as far as new trails, given the landscape-scale losses of forest habitats contributing to the decline of many bird

species. I ask that you remove from consideration all trails that go into, or are adjacent to, the very limited and declining breeding migratory bird habitats, and that the late successional forest, dry forest, mesic mixed conifer, riparian woodland, and meadow habitat types become priority for trail removal and habitat restoration.

Regarding elk and mule deer, I was stunned, again, at missing analyses. With Starkey research delivering solid science and recommendations for analyses, why were there no project analyses reported for these very important species? Further, I believe statements about avoiding disturbance only during construction and maintenance are incorrect; that is; disturbance avoidance applies to trails anytime. My hope is the project level analyses were done and just were not included in this EA draft. The public needs to know what the analyses show. Mule Deer Foundation and Oregon Department of Fish and Wildlife, have made it clear: mule deer populations in Oregon are in decline, for various reasons, two of which are lack of thermal cover on National Forests, and because they are disturbed by humans more frequently which results in lower fitness of the does, hence fewer fawns. This project should be considering the ungulate situation in a vacuum, but rather at the landscape scale. As you must know, local hunters depend on National Forest management decisions. In my career, I found it is wise not to let this significant constituency down.

Upon reflection, the approach to this project just seems flawed. For example, this statement: *“For many wildlife species, the high levels of human use which occur throughout most of the project area have diminished the ability for these areas to serve as effective reproductive habitat to some degree.”* It reminds me of the restaurant that would not install a handicapped ramp because “the handicapped never come here anyway”. The current deficit of breeding habitat does not relieve the USFS of providing breeding habitat. Otherwise, the National Forest Management Planning Act would have been the “National Whatever is Left Documentation Act”. The Ochoco does need to take a hard look at your wildlife habitat situation: what you had, what you have left, what needs protection, and what you need to restore.

And this statement: *“..this trail system has been utilized consistently by equestrians for over 25 years and therefore while designating the trail does administratively change the amount of core habitat present on the landscape, the function of the area in general will not be significantly altered when compared to the existing condition.”* Twenty-five years is a teeny tiny timeframe for a forest or a meadow! For wildlife, a quarter century covers maybe one generation; maybe a couple. First, the EA did not spell out what exactly those impacts of the non-designated trails created 25 years ago were and are. If you are considering an alternative now, that is based on actions that happened 25 years ago, and you never report what those impacts were and are in this current EA, it is not legitimate to choose that alternative (since you did not disclose the impacts). Secondly, why didn’t this EA offer an alternative that was about

restoration of the sensitive and important wildlife habitats that existed 26 years ago? Just because someone fragmented habitat, without USFS diligent review and approval 25 years ago, doesn't give the USFS a pass on returning areas back to functional habitat. That is an option, you know: restore ecological functions.

The Cumulative Effects statements are incomplete. Was that a human error to not copy and paste the analysis? Or was there actually no analysis? Need to fix this too.

The Summary is inconsistent with the content provided prior to the summary. It reminds me of when a USFWS biologist submitted to a decision-maker a set of facts about the status and trend of a species, and concluded the species was in decline, and then the decision-maker changed the last sentence to say the species is doing just fine. I don't know what to make of this disconnect. Need to resolve.

In conclusion, rather than increasing acres of impacts, I suggest the USFS enhance efforts toward education and enforcement. I understand the pressures. Balancing multiple uses is what makes U.S. Forest Service work so challenging, relevant, and fulfilling. Perhaps some local citizens or business-interests would love to choose where and how many trails go throughout the Forest, but National Forest leaders are tasked with not taking a narrow view, as these are the Nation's forests. It is the national laws that must guide decisions. With increasing human population pressures, managing people, not further degrading the ecosystems, has to become the norm, or you will lose our sustainable landscapes and not fulfill the mission of the agency.

As promised, my recommendation for staff and line personnel: To review and utilize PNW-GTR-993, "*Sustaining wildlife with recreation on public lands: a synthesis of research findings, management practices, and research needs*", as this is the only USFS-prepared document summarizing how to assess the impacts of recreation on wildlife, and how to minimize those impacts. It was requested by, and guided by USFS NFS managers, including Region 6 managers, and prepared by USFS R&D scientists and NFS biologists, including Pacific Northwest Research Station scientists and Region 6 biologists. The documents referenced in this GTR are listed at the end and can provide more detailed helpful information, as needed.

Thank you for the opportunity to comment.

Monica Tomosy