

On 4/30/24, I decided to pay for an annual subscription to the website Trailforks.com. Not because I wanted to, but because I had to, and it finally helped me to understand the pattern of behavior exhibited by the staff at the Hebo Ranger District that has plagued this project since 2019. So let me explain.

When the final Environmental Assessment (EA) for the Phase 2 of the Sand Lake Restoration Project <sup>1</sup> was released in on 03/26/24, I was disappointed, but not surprised, to find its authors continue to minimize and misrepresent the scope of the project and the nature of the impacts that are authorized with this action. According to the updated biological assessment, impacts to Marbled Murrelet and Spotted Owl populations are likely to be adverse, but do not rise to a significance level warranting an Environmental Impact Statement (EIS). However, the entire basis for that assessment has been the subject of dispute since 2019, so I wanted to do a final verification of their reasoning and sources.

As outlined in Chapter 3, pages 175-178 of the EA, the Forest Service contends that the Whiskey Run mountain bike trail system In Bandon OR best represents the expected use of their proposed trail system, so use statistics from Whiskey Run were used to estimate that the proposed action would draw 16,000 rider visits a year to Sand Lake. A footnote to this number explains that it is compiled from ride tracking applications, so the USFS adjusted the reported use from Whiskey Run (12750) by 25% to account for riders who don't use ride tracking apps (page 182). This is the number used to conduct this environmental impact assessment, a number that has been repeatedly questioned throughout this NEPA process, and the fact that it remained the same a number of years after it first appeared suspicious.

For almost 5 years, I have been trying to understand exactly what is being proposed with this action in terms of the scope and scale of use, so I was already aware of the rapid growth being seen at the Whiskey Run trail system. Just years after opening, Whiskey Run has become a major draw on the South Oregon coast, and they foresee massive growth in the future: growth touted in the media,<sup>2</sup> by tourism advocacy groups,<sup>3</sup> by the county,<sup>4</sup> even by national mountain biking alliances.<sup>5</sup> Thus, I knew there were experiencing the same growing pains as other recent, popular trail systems.<sup>6</sup>

At Whiskey Run, they've outgrown the original implementation in just a few years, so planning is already underway for additional parking, paving, a 30 spot campground, and additional trails.<sup>7</sup> In addition, the growth is resulting in stressors that were never planned for, like issues with unauthorized trail building and lack of collaboration with the local emergency services. As late as June 2022, four years after the

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<sup>1</sup> <https://usfs-public.app.box.com/v/PinyonPublic/file/1482326871633>

<sup>2</sup> <https://www.singletracks.com/mtb-trails/oregon-meet-your-next-mountain-bike-trail-destination/>

<sup>3</sup> <https://www.oscrtn.com/uploads/1/3/1/0/131079031/tsocannualreport2021verticlewebsitesize.pdf>

<sup>4</sup> [https://theworldlink.com/bandon/news/coos-county-awarded-150-000-in-funding-for-whiskey-run-mountain-biking-trail/article\\_d9afcb6c-f875-5e27-907b-089090d28dd8.html](https://theworldlink.com/bandon/news/coos-county-awarded-150-000-in-funding-for-whiskey-run-mountain-biking-trail/article_d9afcb6c-f875-5e27-907b-089090d28dd8.html)

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[https://www.facebook.com/story.php/?story\\_fbid=595422264475768&id=228381504513181&paipv=0&eav=Afbk2xdclq1yUb6lUdhacezo-MEhNhdpee-8CCv7ninc6KZd9IA1hdzI5PoJcgJtnTA&\\_rdr](https://www.facebook.com/story.php/?story_fbid=595422264475768&id=228381504513181&paipv=0&eav=Afbk2xdclq1yUb6lUdhacezo-MEhNhdpee-8CCv7ninc6KZd9IA1hdzI5PoJcgJtnTA&_rdr)

<sup>6</sup> [https://industry.traveloregon.com/wp-content/uploads/2023/03/Whiskey-Run-MTB-Research-Report\\_2022-1.pdf](https://industry.traveloregon.com/wp-content/uploads/2023/03/Whiskey-Run-MTB-Research-Report_2022-1.pdf)

<sup>7</sup> <https://drive.google.com/file/d/1tbK3lup6oB99YJK8qEr1WloSdYP9IGtj/view>

trails opened, the WRCMBA meeting notes state, “We need an emergency action plan. We need to be aware that people are going to get hurt.”<sup>8</sup>

The same issues were seen at the BLM’s Sandy Ridge Trail System near Mt Hood almost a decade ago, when after just 2 years, user visits exploded, resulting in many of the same harms. In fact, the impacts were significant enough that it triggered the need to conduct a second environmental assessment in 2017, just a few years after the initial one. This was done to evaluate actions needed to mitigate impacts from overcrowding, which was causing traffic safety issues, invasive species introduction and a number of others, all impacts the forest service deems as unforeseeable when raised in the context of this proposed action.<sup>9</sup>

It was against this background I struggled to understand the static, low user estimate provided by the USFS given the similarities in impacts between Sandy Ridge and the USFSs chosen comparable for the proposed action. With only 16,000 rider visits a year, how could Whisky Run be experiencing the same issues Sandy Ridge saw manifest with so many more user visits? Was it poor implementation? Other local issues? I couldn’t answer that question without paying for an annual subscription to Trailforks as the USFS chose to use statistics that lay hidden behind a paywall, a strange choice when that number was the basis for their entire environmental assessment of the impact of recreational trails.

With the subscription, I quickly found what I assume was the reference number, 12,943 was from 2020, but for 2023, it showed 20797 user visits, almost double the number of users, which would already invalidate the assumptions used to conduct this impact assessment, especially since they remained silent on expected growth in the EA.

But then I noticed that the source number, the one the USFS hid behind a paywall, IS NOT WHAT THEY CLAIM IT IS. The footnote in the EA suggests this is a visitor number derived from ride tracking apps, but in reality, it represents ride check-ins on the Trailforks app. Just their app. One app. While popular, it is not used universally by any measure. So the number does not reflect actual user numbers, not in 2019, not now, nor is it meant to. It provides users of the service a relative indicator of the popularity of trail systems for many purposes, but is a gross underestimate of actual use.

So let me reiterate this. The number used as the basis for the entire environmental assessment related to the introduction of mountain bike trail system to this habitat and community, the number used to evaluate the impacts to the Marbled Murrelet and Spotted Owl habitats, the number used to dismiss concerns related to impacts to the human environment, is a complete misrepresentation of the actual source data.

Then what is the reality? While I can find no published user estimates of actual unique visitors to the Whiskey Run trail system, a quick survey of the mountain bike trails systems with published user numbers is instructive.

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<sup>8</sup> <https://drive.google.com/file/d/14OP0BzEBBFpHW6MNR5KXqn-04JQh607d/view>

<sup>9</sup>

[https://eplanning.blm.gov/public\\_projects/nepa/61844/111231/136150/Sandy\\_Ridge\\_Revised\\_EA\\_Final\\_508.pdf](https://eplanning.blm.gov/public_projects/nepa/61844/111231/136150/Sandy_Ridge_Revised_EA_Final_508.pdf)

Oakridge, a trail system also mentioned in the Sand Lake EA (pages 180-182), sees an estimated 35000 user visits annually<sup>10</sup> while the Trailforks app shows 7400 check-ins in 2023, an underestimate of actual use of almost 500%

Sandy Ridge, the trail system mentioned previously, sees 120,000 visits as noted in the EA conducted by the BLM,<sup>11</sup> a number which is comparable to the 125,000 touted by local tourism groups.<sup>12</sup> And the BLM did their assessment in 2017. But in 2023, Trailforks still shows only 22,000 check-ins, underestimating actual use by almost 600%.

The bottom line is that the Trailforks data is not at all representative of the actuals at Whiskey Run or anywhere else. If anything, they only support the point I and many others have made countless times. Use of mountain bike parks with the proposed amenities and scale, especially in destination locations like Bandon, Mt Hood, Hood River, and eventually here, are used by hundreds of thousands of people a year. But the USFS continues to ignore this reality.

And as egregious as this misrepresentation is, it is somewhat trivial in comparison to the overall pattern to which it belongs. Below I outline this pattern in detail, demonstrating an objectively verifiable pattern of obfuscation and minimization related to the likely and foreseeable impacts the concentrated human presence that will be authorized with this action, allowing the forest service to dismiss real and foreseeable environmental harms, all to push through a project backed by the economic and tourism engine in this state with absolutely zero regard to local concerns. The responsible parties speak with a dismissive voice when discussing these harms, all while they continue to publicly advocate and support the full implementation of said project.

This pattern began to emerge as early as 2019. On 11/13/19, following a public meeting where scoping results for the full Sand Lake Restoration Project were discussed, I asked TORTA, the Hebo District Ranger and staff about the scale of the project, trying to get a sense of how big it would likely be in terms of visitation. I was told at the time that a socioeconomic analyses would be prepared for the draft EA, which would include case studies for visitations and impact.

By early summer 2020, a number began circulating in conversations with USFS staff who had seen copies of the report saying 60,000 users a year was likely. I asked where this number came from and was told it was based on visitor estimates to Timberline Mountain Bike Park at Mt Hood, which I immediately pointed out was an inappropriate comparable since snow covers the park for 9 months of the year, and asked what a realistic number would be for a year round park, without a response.

But even at 60,000 user visits annually, myself and a number of USFS staff recognized this number was already too much of a burden. On 7/20/2020, an email<sup>13</sup> from the USFS planner, said with respect to the trail system,

“Estimated socioeconomic analysis for trails use is covered in the draft environmental analysis and looks at several mountain bike trail systems around Portland and the Hood River area –

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<sup>10</sup> <https://www.ormtbcoalition.org/>

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[https://eplanning.blm.gov/public\\_projects/nepa/61844/111231/136150/Sandy\\_Ridge\\_Revised\\_EA\\_Final\\_508.pdf](https://eplanning.blm.gov/public_projects/nepa/61844/111231/136150/Sandy_Ridge_Revised_EA_Final_508.pdf)

<sup>12</sup> <https://www.ci.sandy.or.us/community/page/sandy-ridge-trail-system>

<sup>13</sup> Email from Alexander Wickham, USDA, July 20, 2020, 2:40 PM

these full service communities can support up to 60,000 user visits/year. Infrastructure in the Sand Lake/Pacific City area will likely not be able to support that much use at this time.”

At the time I was assured the draft environmental analysis would anchor the user numbers and assess environmental impacts, and was told that USFS staff would be looking at more than just Timberline.

In follow-up meetings with the USFS, I inquired as to which mountain bike systems they were looking at in Portland and the Hood River area, curious if USFS staff was implying they were going to look at the year round parks at Post Canyon in Hood River, OR and the Sandy Ridge Trail system near Mt Hood, but again, never got an answer.

Throughout the fall of 2020, I looked into these year round trail systems in anticipation of the draft EA, wanting to understand the scope of all this. I was quickly able to ascertain that they were both of comparable size and layout to the proposed Sand Lake system, both had similar amenities (though as I recall, neither of the referenced trail systems had a skills park), both were built in popular destination locations with comparable visitor numbers to Pacific City and the North Coast,<sup>14</sup> and both had the same population to draw from, with approximately 4 million people within a 100 mile radius of their location, just as Pacific City.<sup>15</sup>

Given the estimated visits at Timberline over the short summer window, I was expecting to see user numbers at these other trail systems as some multiple of 60,000, and that is exactly what I found. In the previously mentioned BLM EA for the Sandy Ridge trail system,<sup>16</sup> I found the estimate of 120,000 visits, a number documented in the EA with an anticipated growth of 8% a year until saturated, with an estimate of 2 to 4% growth a year. Given this document was produced in 2018, we can assume there has been significant growth since then. A conservative annual increase of 4% would put the 2024 user visits at almost 160,000.

In 2016, the last year user estimates were available, Post Canyon had 200,000 visits.<sup>17</sup> If we assume the same 4% growth since then, Post Canyon could reasonably be seeing almost 275,000 visitors a year, but even that is likely an underestimate.

Given these numbers, I was expecting something much, much higher than 60,000 user visits to come out of the socioeconomic analysis, which the USFS explained would form the basis for the environmental impact assessment being prepared.

But much to my shock, when on 11/25/2020 the draft EA was released, there was complete silence on the environmental impacts of such concentrated use, and there were no details on the expected use. Instead, in the section that was to speak to the environmental consequences of the proposed action, Chapter 3, pages 159-163, the authors of the document spoke only about the subjective benefits of the trail system, while including the following statement about user impacts –

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<sup>14</sup> <https://industry.traveloregon.com/resources/research/oregon-travel-impacts/>

<sup>15</sup> <https://www.maps.ie/population/>

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[https://eplanning.blm.gov/public\\_projects/nepa/61844/111231/136150/Sandy\\_Ridge\\_Revised\\_EA\\_Final\\_508.pdf](https://eplanning.blm.gov/public_projects/nepa/61844/111231/136150/Sandy_Ridge_Revised_EA_Final_508.pdf)

<sup>17</sup> <https://traveloregon.com/things-to-do/outdoor-recreation/bicycling/riding-the-post-canyon-trails-2/>

‘A Socioeconomic Analysis example for other Mountain Bike trail systems can be found in the Trails Recreation Report. Because of the distance (<2 hours from Portland and Metro area) similar use is anticipated.’

When asked why the details of the report were not included, I was told it was still under development, and would be provided when complete. Due to this gross oversight in the draft EA, on 12/22/2020, I submitted public comments to that effect, explaining that the USFS can not make a proper environmental assessment and the public can not comment on the expected environment impacts if the concentrated human use is just ignored.

Based on my own and numerous similar comments, I was assured proper use estimates and impacts would be included in the final EA. But in continued conversations with the Hebo staff through 2021, it was clear they were already backing away from the higher user estimates, often choosing to portray the project as a small community trail system whose use was likely going to be minimal.

I was told their assumptions would be documented in the final EA, along with a better anchored estimate than the 60,000 annual users or the much, much higher numbers I uncovered. Given their sudden lack of concern, I then asked the question differently, wondering what would be done if the user numbers turned out to be an underestimate. I wanted to know how they planned to evaluate and mitigate broader environmental impacts to the lands and local community should user growth exceed expectations. This, as I recall, is when the Hebo staff first stated they would create an adaptive management plan as part of the operations and maintenance plan that TORTA was developing, a plan that was to outline USFS, TORTA and county agency responsibilities against numerous future growth scenarios.

On 3/30/2022, when the final EA and draft decision were released, I found the previously discussed estimate of 16,000 user visits. The previous conclusion stating the proposed trails system would see usage similar to those in the Portland area was abandoned. At least in the part of the document where it was convenient to undersell the expected use. Elsewhere in the document they continued to speak of the prospects glowingly,

“The mountain bike trail system is intended to become a well utilized recreation site with the potential to draw visitors from out of the area. Given the proximity to the metro-hub of Portland and vacation destination of Pacific City, the trail system will likely get significant use.” (Page 65, Chapter 3)

What did the staff at USFS use instead? They looked to a newer mountain bike trail system, the previously discussed Whiskey Run trail system near Bandon. To me, this was an illogical departure as the Bandon area is relatively remote in comparison, and supports a resident population only one quarter of the size <sup>18</sup> with fewer direct and indirect overnight visitors.<sup>19</sup>

In the supporting documents for the final EA, I found the referenced trails report that had been discussed for a couple years by that point, eager to learn why such a departure was warranted, and eager to learn whether they ever studied year round comparables in Mt Hood and Gorge as previously

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<sup>18</sup> <https://worldpopulationreview.com/us-cities/bandon-or-population>

<sup>19</sup> <https://industry.traveloregon.com/wp-content/uploads/2023/06/Travel-Oregon-Visitor-Profile-2021-22-Statewide-Report-of-Findings-rev.-6.23.pdf>

stated. But they did not. Instead they chose Oakridge, Timberline, Whistler, Ski Bowl, and Winter Park. All choices that give artificially low numbers, either because they are only open during the short few months without snow, or are relatively remote like Oakridge. However, each of the alternate estimates were far greater than the now discredited case study for Whiskey Run trail system in Bandon.

Frustrated by the extraordinarily low user estimate, I was curious to see how they handled the possible user growth in the promised adaptive management update to the operations and maintenance plan. But in response to my inquiries as to why it was not included, on 04/04/2022, I was told by the Hebo Ranger,

“So, no, the final, detailed Operations and Maintenance plan will not be included in the NEPA document. This document is still under development. It will be a required component of the agreement that we will be developing with TORTA to allow them to do the activities that the project proposes. We will be working with TORTA over the next few months to complete this. It will be in place and signed by all appropriate parties prior to any work being started on the project.”<sup>20</sup>

In other words, it was not available and they had not worked on it. Therefore, I believed it was only prudent to document my objection, so on 5/12/2022 I submitted an objection to the final EA, again with a focus on inadequately anchored user estimates and the failure to evaluate attendant impacts to the land and communities that could result if they are not mitigated or planned for.

As a result of this objection, on 6/16/2022, I attended a meeting with the Forest Supervisor of the Siuslaw in an attempt to resolve my objection. As seen in the archived meeting notes,<sup>21</sup> I made it clear I was not interested in delaying the project, I just wanted to see a formal plan in place that looks at the broader environmental consequences should user growth exceed the extraordinarily low estimates in the EA, estimates he considered aggressive. I was growing concerned that these issues and impacts were falling through the cracks and commitments were not being met. I was also concerned about environmental impacts being addressed outside the NEPA process as the Hebo District Ranger clarified in his email. However, the Forest Supervisor assured me the adaptive management strategies would be developed and finalized in the document before the final decision and agreements were in place. Based on these assurances, I withdrew my objection. That, I now see, was a mistake.

After that, there was silence. I was informed in other meetings that consultations on the biological assessment were taking longer than they planned, so they were continuing to work on it. But on 3/26/2024, when their consultations completed and final EA was released, it still lacked an adaptive management plan or broader impact assessment, and the user estimate was unchanged as previously noted.

My concerns mounting, I shared this information with our recently formed Sandlake Community Group, comprised of dozens of families from Tierra Del Mar to Cape Lookout. They are well aware of the background on this so I shared my continued disappointment and intention to meet with the Hebo District Ranger, asking if any others wanted to join the discussion as I knew they had their own questions.

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<sup>20</sup> Email from William Conroy, FS, April 4, 2022, 5:02PM

<sup>21</sup> Email from Hannah Smith, FS, June 22, 2022, 12:41PM

So on, 4/27/2024, I, along with other representatives from the Sandlake Community Group, met with the ranger. With respect to our goals, the meeting was an absolute waste of time, though it provided the clearest example in this entire saga of the continued, deliberate misrepresentation and minimization of this project by the USFS when faced with the legitimate concerns of the local community.

We explained our ongoing concerns and the lack of upfront planning. I reminded the ranger that the adaptive management plan still hasn't been produced, even though his predecessors committed to having it in place before we ever got this far. He stated it had been completed with the updates and it would be forwarded for review. Later.

We then explained the years of raising unaddressed impacts related to this project and the potential for unchecked user growth and the attendant impacts to the watershed, to the wildlife, to traffic, to human health, safety and property. We asked what county agencies have said about the infrastructure supporting a project of this scale, how traffic flow will work, how trailhead congestion on a single lane road or traffic congestion at the Sandlake intersection might affect emergency services.

What was his response? He said no consultations have been made, but he encouraged us to do it ourselves. He continued, dismissing these and our larger environmental concerns as things we have to deal with living next to public lands.<sup>22</sup>

That's right. Hebo's position has now evolved such that burdens born from the implementation of this project will fall on the shoulders of those who live in this community. This has been my argument all along, and this is what we have attempted to avoid. We're right at the finish line and the Hebo staff doesn't feel the need to hide it any longer – they never intended to address the broader impacts. 5 years of commitments and whatever good faith remained in our relationship with the USFS gone in a second.

And how does he justify this? By making the most absurd minimization of the project yet. He now claims that they are just going to gravel over a few landings leftover from the logging. Maybe a few porta-potties. He claims the user estimate in the EA is high, saying the trail system will likely never see more than a few cars at a time. Anything other than that is unknowable, unforeseeable.

And somehow, even after this, right up to the weekend before the comment period would close, I still had some hope left that the USFS had updated the document and taken an honest look at possible growth scenarios, impacts and means of mitigation. It was finally sent on 5/2/24, just days before the end of the objection period.<sup>23</sup>

Did it address anything at all that Siuslaw leadership has committed to? No. Not one thing. It's still a draft that hasn't been revised since April 2021.

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While I'm nowhere close to done here, I think it might be helpful to step aside for a minute and explain what I mean when talking about potential impacts. Are the types of things me and my neighbors bring up simply outside the purview of this kind of assessment? Absolutely not. That is the purpose of the NEPA process, to evaluate all foreseeable impacts to the natural, physical and human environment

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<sup>22</sup> <https://drive.google.com/file/d/1ypxcngBsPV-oJvcLKns9gXEL3r8vBoaz/view?usp=sharing>

<sup>23</sup> DRAFT Operations and Maintenance Manual Sand Lake Planning Area Mountain Bike Trail System

related to the proposed action – direct, indirect and cumulative. I’ve included ample references demonstrating precedent for similar evaluations related to recreational trails systems, and there is precedent in the very EA I’m objecting to.

Which is why I believe the minimizations are intentional. That is why the USFS has been playing these games with the user estimates. If the USFS maintains that they are using the best available information, and the proposed action will have nothing more than an incremental impact to the historical human presence in the area, the current baseline, then it not only alleviates the need to do a complete environmental impact assessment for the likely and foreseeable impacts related to changing patterns of human use, it alleviates their obligation to even plan for them. Once they get a signed decision, the baseline changes. The new human activity is sanctioned and will never be questioned should use grow unchecked and impacts arise. This isn’t an unusual practice, and this is how the ranger can state the burden is simply for the community to bear.

But what if there are likely or certain changes to those patterns that we can see now? What does that mean? How does unprecedented (for this ecosystem) concentrated, sustained human recreation presence in the project area widen the potential environmental impacts? Are such impacts simply unforeseeable, so mitigation measures can’t be deployed as the USFS claims? I don’t know. I don’t get paid to do this like they do, but let’s see if it’s possible to foresee some of the unforeseeable.

First, the obvious. Given all I’ve outlined above, I think it’s fair to say that most reasonable people would conclude that estimated visitor numbers used in the EA are approximately an order of magnitude low. The USFS says 16,000, so let’s use 160,000 as the base case.

In that case, is the USFS really going to tell the public that the biological assessment for habitat impacts to the Marbled Murrelet and Spotted Owl wouldn’t change if they used 160,000 or another properly anchored base case for visitors? They already see adverse impacts at 16,000 annual visits, at what point does the impact become significant?

And how does such an increase in visitation affect other species of concern with respect to things like habitat disturbances, migration impacts and the like?

What about the near certain, inadvertent introduction of invasive species with an order of magnitude increase in mountain biker visits? Would this trigger an upfront mitigation program, or do we have to wait until this impact is realized? That is what happened with the Sandy Ridge trail system; they didn’t appreciate the threat up front and had to deal with it after the problem already got a foothold.

And what about cumulative impacts to the restoration of the forest? Remember, the one that was just logged? The one whose soils on some of the steep north and west facing slopes still haven’t recovered from the fires in the 19<sup>th</sup> century and the heavy logging in the 20<sup>th</sup> century? Add to that new threats of unauthorized trail building as they are seeing at Whiskey Run,<sup>24</sup> shortcutting, creek running? How do those impacts manifest at scale? What about forest impacts due to increased disturbance from overflow parking and traffic in general. In the EA, they assess the duration it will take the forest to heal after the logging, but how is that changed when they add a new, concentrated stressor like this? What level of user traffic does it take for them to be concerned enough to look at it before approving the action?

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<sup>24</sup> [https://drive.google.com/file/d/11SFhIAVdZIKfxoAl9DzGr\\_0xkH0dg5Lu/view](https://drive.google.com/file/d/11SFhIAVdZIKfxoAl9DzGr_0xkH0dg5Lu/view)



And let's not overlook watershed impacts. There are miles of planned concentrated trails on the lowest reaches of the local watershed, trails that cross the streams and water features that feed Gurtis Creek and a number of other unnamed streams, streams whose water quality has already been impacted by the logging. This is water that feeds one of the last pristine estuaries in Oregon. This is the water that some in the community use for drinking, for their gardens, some even feed surface wells. They are putting the main trailhead there as well. 30 parking spaces, toilets, trash. How many passes through this water a day is acceptable to the USFS? At what point does it become a problem?

Given the numbers and case studies we already discussed, in just 2 or 3 years, it's not only plausible, but probable, to see 1000 riders a day during peak weekends. What does that look like in terms of traffic? I'm not sure, but I can tell what it looks like for user numbers slightly lower than that 160,000 number. In the second EA for the Sandy Ridge trail systems, they did the study for us. One they could have used. One I even pointed out to them. The BLM estimated that Sandy Ridge receives an average of 326 vehicles each day during the peak season, which lasts 184 days. (Page 39)<sup>25</sup> Let's just use these numbers, even though they're from 2017.

The lower trailhead outlined in the proposed action is expected to hold up to 30 parking spots, so on busy days when full, it is not unreasonable to conclude that people wishing to park there will simply park on the shoulders of the 1004, up and down the mountain. This kind of repeated overcrowding was discussed in the Sandy EA, but their overflow and parking issues spilled onto a busy, 2-way main thoroughfare. What happens in our case? Here, we will see overflow onto a single lane road with heavy brush. This increases wildfire risk and this increases disruptions to flora and fauna. And given that mountain biking is an inherently injury prone sport, it's not hard to imagine congestion that impedes emergency vehicles. The same applies to fire response. The same applies to Tsunami evacuation. The same applies to frantic, injured riders who, unable to find cell service on the mountain, try to get down the mountain for help.

This isn't hyperbole. 326 vehicles will go up, then come back. That's a car passing a given section of the 1004 every minute, all day, every day during peak season. On peak weekends that could be every 30 seconds on average. With no inherent limiting means discussed in the EA, we could have cars parked up and down the shoulders of the 1004 through the whole trail system. Will that not pose an impact to emergency services should they need to access the upper mountain? The chosen comparable in Bandon is already dealing with this issue.<sup>26</sup> And what about the dust, the noise, the inability to safely walk on the access road? Are those not impacts as well?

Despite the USFS claiming that vehicles will access the trail system by following signs from the Andy Creek junction, with riders willingly choosing an almost 10 mile approach instead of a 0.3 mile approach to the main trailhead on single lane gravel roads, with almost a half hour impact on travel time, I think a reasonable person can see that the majority of the 326 vehicles will access the trailhead through the 1004 and Sandlake intersection. Again, that is 650 trips when considering up and back, that is effectively a car passing once a minute. And again, during busy weekends, these average numbers could effectively double, with a car passing every 30 seconds.

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[https://eplanning.blm.gov/public\\_projects/nepa/61844/111231/136150/Sandy\\_Ridge\\_Revised\\_EA\\_Final\\_508.pdf](https://eplanning.blm.gov/public_projects/nepa/61844/111231/136150/Sandy_Ridge_Revised_EA_Final_508.pdf)

<sup>26</sup> <https://drive.google.com/file/d/14OP0BzEBBFpHW6MNR5KXqn-04JQh607d/view>

How is this supposed to work on a single lane road feeding a busy Sandlake Rd? Perhaps the authors of this EA aren't familiar with the area during busy weekends, but Sandlake Rd experiences heavy traffic; it becomes a continuous flow of vehicles. Even without the proposed action, it is not uncommon today for groups of cars to come down the mountain together, sometimes creating a line up of up to a half dozen vehicles as they try to turn left to Pacific City. As a result, it is not uncommon to wait 5 minutes for such a back up to clear out. What does that look like when the traffic increases to these levels? Is the USFS authorizing chaos here? They don't think this volume of traffic will cause backups on Sandlake Rd itself? What happens when a line of 10 or 20 cars gets stuck waiting to turn because of traffic, and those riders waiting to turn left onto 1004 can't until that line up clears? Or those who turn onto 1004 only to realize it is a single lane and the road is blocked. Do they backup onto Sandlake Rd, do they start to cut over private property? Add to that an increase of bikes on Sandlake Rd trying to access the trail system and soon there is concentrated chaos.

No matter how you slice it, the backups will be significant. Emergency services run up and down Sandlake Rd. frequently, dealing with every kind of summer emergency. How often will the backups caused by the authorization of this action impact them? South Tillamook County is already known to bear the brunt of tourism. The county and emergency services has been struggling with this kind of overcrowding for years to the point that on some weekends there can be over 100,000 visitors in the county, quintupling the population.<sup>27</sup> A few years ago, at a Tillamook County Commissioners meeting, the Tillamook County Sheriff made the following comment –

“I’m concerned to the point that if there’s a major incident in the county, given the number of people who are here, we would be unable to respond effectively to a major incident.”<sup>28</sup>

It doesn't take anything more than common sense to see that some basic conversations with the county and emergency services might shed some light on real, dangerous scenarios that put public health and safety at risk. How many accidents are acceptable because they didn't think this through, how many injuries to those who live here? Oh that's right, that's not their concern.

It isn't difficult to see how impacts from this authorization could extend from Cape Lookout to Tierra Del Mar, impacting residents, recreationists and emergency services alike. But for 5 years, the USFS promised to, then chose not to do the hard work and find ways to assess and mitigate, choosing instead to minimize and dismiss, until the current district ranger had the audacity not only to tell our community group that the burden should fall on us because we chose to live here, but that we should bring up our concerns about emergency vehicles, traffic, congestion and other environmental impacts with the appropriate county agency.<sup>29</sup> How did that become our responsibility? The USFS haven't even had the discussions. That is why this is such a recipe for disaster. This will grow beyond their control, just like the Sandlake ATV site.

If there were any clearer indication of the indifference the USFS has to the concerns of the local community, I don't know what it would be. The project has not even started yet and the planning and

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<sup>27</sup> [https://www.tillamookheadlightherald.com/news/county-leaders-discuss-tourism-influx-of-visitors/article\\_681b984a-e626-11ea-95b4-87b0a14a3b24.html](https://www.tillamookheadlightherald.com/news/county-leaders-discuss-tourism-influx-of-visitors/article_681b984a-e626-11ea-95b4-87b0a14a3b24.html)

<sup>28</sup> [https://www.tillamookheadlightherald.com/news/county-leaders-discuss-tourism-influx-of-visitors/article\\_681b984a-e626-11ea-95b4-87b0a14a3b24.html](https://www.tillamookheadlightherald.com/news/county-leaders-discuss-tourism-influx-of-visitors/article_681b984a-e626-11ea-95b4-87b0a14a3b24.html)

<sup>29</sup> <https://drive.google.com/file/d/1ypxcngBsPV-oJvclKNs9gXEL3r8vBoaz/view?usp=sharing>

mitigation burden has already shifted to those who live here, just like we said it would. Despite 5 years of commitments to ensure that mitigation plans are in place before any decision is finalized. How that escapes this ranger so magnificently is truly something to behold.

Authorizing this action is the catalyst for all these impacts. Nothing more, nothing less. Absent any action, there is no foreseeable future scenario where a concentrated human presence just appears on this mountain. This is a development project. Any other development project in this county that stood to impact the natural and physical environment to the degree I've outlined above would be scrutinized by all applicable county agencies. If this were not on public lands, a project of this size would likely require planning meetings, there would be meetings with Community Development, with Emergency Management, Facilities Services, Roads, with Health and Sanitation. Walking into the Community Development office with what amounts to napkin sketches and 'stoke' wouldn't get you far. You would have to spend the time, you would have to spend the money, you would have to have the hard conversations. And in the end, you may just find out the county says – nope, sorry, you still aren't meeting the standards we set out, we aren't approving this.

But here? On public lands? Just a few handshakes and some poorly detailed documents that haven't been updated in years is enough to permanently transform a land and its community. They are willing to unleash this on us with so much as a second thought. Everyone involved is complicit in this.

What will be built is not some diminished version of a mountain bike park that only exists in the imagination of the Hebo District Ranger, it is the version that exists in the document that bears his still wet signature. What they are proposing in this action is what was supposed to be analyzed for impacts – the full implementation. You don't analyze an infrastructure or any other development project by analyzing its partial completion, you analyze what will be authorized. I don't know why this is so confusing.

And that version is not some modest trailhead in a random patch of forest where you may be able to sell the public on incremental change and unknown usage. It is a world class mountain bike park with 4 trailheads and 65 parking spaces, a skills park, permanent toilets, kiosks, and signage for the 30 miles of trails. This is a mountain bike park and trail system that is supported by Oregon State Parks, Tillamook County, Travel Oregon, The Oregon Mountain Biking Coalition and countless other advocacy groups.<sup>30</sup> Money is waiting for this final decision. TORTA has corporate sponsors, they have the support of numerous professional mountain bikers<sup>31</sup> and other advocates. There are documentaries, podcasts, articles all proclaiming the potential this project has to be one of the best mountain biking trail systems in the country.<sup>32 33 34 35 36</sup> Even the subject EA speaks of its significance. All the public praise, even by the Forest Service staff, speak about what this will become. And yet doing this world class project in one of

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<sup>30</sup> <https://www.tortamtb.com/affiliates>

<sup>31</sup> <https://traveloregon.com/things-to-do/outdoor-recreation/bicycling/mountain-biking/oregons-flourishing-freeride-mountain-biking-scene-with-carson-storch/>

<sup>32</sup> <https://www.pinkbike.com/news/podcast-trail-effect-episode-21-tillamook-off-road-trail-alliance.html>

<sup>33</sup> <https://www.bikemag.com/videos/pacific-prospects>

<sup>34</sup> <https://www.tortamtb.com/affiliates>

<sup>35</sup> <https://vimeo.com/392776366>

<sup>36</sup> <https://freehub.com/biketown>

the most heavily visited areas of the Oregon Coast, the Hebo District Ranger claims it will remain relatively unused.

Drive between Pacific City and Cape Lookout on any random day between April and October and tell me – what trailhead around here remains unused? On busy weekends, what trailhead serving any segment of the recreation community isn't already dealing with overflowing parking? Why would this be the exception?

What they are really proposing with this action amounts to handing the keys to this forest over to a networked, fast growing segment of the industrial recreation and tourism sector to develop a world class, signature park, one with known and foreseeable impacts to this environment that the USFS and its partners are choosing to ignore. Which is ironic on its own. It's really quite amazing, spending the last few days reminding myself who all is involved. Without exception, every single organization involved proudly speaks of their environmental stewardship and community alignment as foundational principles, and yet every one of them remain silent on these real and foreseeable environmental impacts. None have reached out through this process to any of us expressing these concerns, none have submitted comments requesting that impacts to the broader environment or community are identified and mitigated. Just silence. It speaks volumes.

I'm tired of this conversation. I'm tired of explaining the obvious to the uninterested. I've wasted considerable time and energy over the last 5 years seeking real strategies and mitigation plans from the USFS, in what I thought was a good faith relationship. But now I see the repeated misrepresentations, the obfuscation and minimization is either deliberate or the result of incompetence. Staff turnover is no excuse.

Therefore, I object to the proposed action for the second time, an objection I will not be withdrawing this time. This community is owed some real answers. We deserve an open and honest case study characterizing the likely scale of use. We deserve an environmental assessment that takes an honest look at the expected impacts of concentrated human recreation at the identified scale and develops credible mitigation strategies in response to those impacts. All things we've asked for over the course of 5 years.

If the USFS continues to ignore these concerns, or only wants to discuss more, ineffective half measures, I'm prepared to exhaust every administrative and legal means available to see the USFS identify impacts and establish any necessary mitigation strategies for these real and foreseeable environmental harms to our community, before this turns into the nightmare it will undoubtedly become.

**Adam Rasmussen**  
**5/5/2024**