

To:

Ouachita National Forest
Mena-Oden Ranger District
1603 Hwy 71 North
Mena, AR 71953

July 10, 2024

Subject: Trails at Mena Project

Dear Sir or Madam:

The Ouachita National Forest has withstood the sands of time relatively untouched by modern man. For centuries Native Americans, European settlers, and modern-day Arkansans have viewed the Ouachita mountains with admiration. Visitors to the ONF were afforded the opportunity to hike, hunt, camp, and fish in this unspoiled region only because past generations allowed them to. Past generations left the mountains as they were, so we too could fall in love with the Ouachitas. The proposed Trails at Mena project will remove the opportunity to see this region in its natural state for all future generations. For this reason, among others, I am writing to express opposition to the proposed Trails at Mena Project.

Wildlife and Habitat:

Fragmentation and urban sprawl have become increasingly detrimental to Arkansas wildlife and the habitats on which they rely. This has primarily been happening in the private sector. However, this project threatens to bring the same issues to the ONF, an area that was never meant for urbanization. There is no question that a project of this scale will adversely affect wildlife habitat across the 8,832-acre project area.

Prior to European settlement, Native Americans maintained wildlife habitat with fire. Fire allows forest regeneration resulting in adequate understory and cover to support thriving wildlife populations. Deer, bear, and turkey greatly benefit from fire. Today, and for good reason, we have all but eliminated natural occurrences of fire in our forests. The NFS, particularly the ONF, has recognized the importance of fire and has done an excellent job introducing controlled burns and selective timber harvest to simulate natural occurring fire. These practices will likely be removed if the project is implemented leading to 8,832-acres of marginal wildlife habitat. I have seen this happen to other areas where the focus is now on mountain biking.

The mountain biking community seems to view selective timber harvest and controlled burns as detrimental to forest and wildlife health. This could not be further from the truth, and you would be hard pressed to find a forester or wildlife biologist that shares the same opinion.

Dispersed Recreation - Hunting:

The activity with the longest history across the project area is hunting. The Draft EA study notes that, *prehistoric occupation of Southwestern Arkansas dates back to the Paleo-Indian period (ca. 12,000-8,500 B.C.).* The study also states, *Hunting and fishing are especially popular in and adjacent to the proposed SUP area.* Interestingly, it is hunting that will be impacted the most if the project is approved.

The adverse impact on hunting will come in two forms. The loss of suitable habitat for wildlife (outlined above), and diminished user experiences for hunters. Areas with activities such as mountain biking degrade the hunting experience. Hunters seek solitude, and in my experience hunting in and around areas developed for mountain biking is anything but solitude. The Draft EA study mentions this under the Dispersed Recreation section when it states, *It is anticipated that hunting and other dispersed recreation activities that currently occur on NFS land in the proposed SUP area would continue to be allowed; however, the current user experiences associated with these activities could be altered based on the proposed increase in developed recreation, and some users may be displaced as a result.....varying degrees of development could impact opportunities for solitude and potentially the quality of hunting experiences.....the introduction of a more developed setting may drive some users of NFS lands away from this area and in search of dispersed recreation elsewhere on the ONF,....* This is not acceptable. Hundreds of millions have been invested to develop mountain bike destinations in Arkansas. Hunters who rely on public hunting opportunities need the ONF to pursue their passion and the proposed project will without question degrade that opportunity.

Hunters are a user group that asks very little from the ONF or other land managing agencies. They simply need access to rural remote areas that allow hunting. The Trails at Mena will effectively strip hunters, the longest known user group, of 8,832-acres of public hunting opportunities in Arkansas.

Economic Impact:

As I read comments from those in favor of the project, I can't help but notice few if any of the comments mention forest and wildlife health, or the impact this project will have on existing users. Economic impact is the primary reason given for supporting this project. I do not feel that the economic impact of a project should dictate the future of the Ouachita National Forest. The ONF should be managed in a fashion that supports wildlife conservation, forest health, and the preservation of wild and scenic places. However, if we compare the economic impact of mountain biking to hunting, we find the impact of hunting in Arkansas greatly outweighs that of mountain biking.

Economic data for both activities varies widely and most cycling data for Arkansas only references the economic impact in Northwest Arkansas. According to a study by The Center for Business and Economic Research at the University of Arkansas, cycling generated \$159 million in total economic impact in NWA in 2022 (1).

Hunting on the other hand generates anywhere from \$789 million to 3 billion a year in Arkansas depending on the source (2,3,4). The Sportsmen's Alliance reported that in 2020 Arkansas

hunters had an economic impact of 1.1 billion with \$322 million being generated in District 4, which includes the project area (4). That is more than double the economic impact cycling had on NWA in 2022.

Again, I do not believe economic impact should be considered when deciding the future of the ONF, but it is worth noting that the economic impact hunting has on this area and our state is substantial. Reducing hunter participation in the project area seems detrimental to the economy of the region and state.

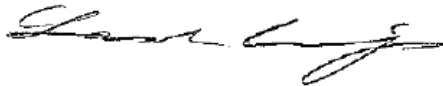
Conclusion:

Wild places are sought out by thousands of Americans every weekend and unfortunately these areas are no longer being created. In fact, the opposite is true. They are slowly slipping away from the American landscape. Arkansas and the Ouachita National Forest have been a shining example of what America once was. Will we be the ones that remove these places from the Arkansas landscape? I genuinely hope not. My hope is that future generations get to see these mountains the way they are and have the opportunity to step away from the hustle and bustle if only for a day. We need these places.

I hope the items discussed above weight into the decision-making process when considering the Trails at Mena Project. I encourage the ONF to select Alternative 1 – No Action for this project.

Keep the wild places wild because once they are gone, they are forever gone.

Sincerely,

A handwritten signature in black ink, appearing to read 'Landen Cummings', with a stylized flourish at the end.

Landen Cummings
Hunter, Hiker, Camper, Arkansan

References:

Cycling Economic Impact (1)

- 1) <https://news.uark.edu/articles/64528/new-report-shows-health-and-economic-benefits-of-biking-in-nwa#:~:text=Walton%20College%20of%20Business%20recently,in%20Northwest%20Arkansas%20in%202022.>

Hunting Economic Impact (2,3,4)

- 2) <https://www.nwaonline.com/news/2011/nov/13/deer-season-boosts-economy-20111113/>
- 3) <https://katv.com/news/local/modern-gun-deer-season-contributes-to-3-billion-hunting-revenue-in-arkansas-arkansas-game-and-fish-hunters-refuge-h-l-creek-hunting-club-david-ferrell-rick-rowland-ryan-glover-economy>
- 4) <https://sportsmensalliance.org/reports/arkansas/>