

July 24th, 2023

The Ozark Society 3428 E. Wyman Rd. Fayetteville, AR. 72701

U.S. Forest Service Ouachita National Forest Mena-Oden Ranger District

These comments are offered in regard to Project EA_240627 *Trails at Mena*. The Ozark Society is a regional nonprofit organization prioritizing both recreation as well as conservation. Our membership is approximately 1,000, mostly in Arkansas.

We recognize that this project offers an opportunity to bring a world class system of mountain biking trails to Mena, the state of Arkansas, and to the surrounding region. We also recognize the value of Rich Mountain as a wild and natural place; an impressive swath of national forest with a well-loved state park on its summit. We would like to explore ways to have great mountain biking trails at Mena, while also maintaining the wild, and scenic elements of Rich Mountain and Queen Wilhelmina State Park. We ask that project planners consider existing qualities that we don't want to lose as this project moves forward. There are three areas in particular that we wish to emphasize.

- First, please protect the natural qualities of Rich Mountain, including its water quality, native animals, plants, and its mature forests. There are rare species on Rich Mountain, some that are only found in the Ouachitas. They will have a better chance of survival if their habitats are given good protection as a part of this project. Keeping streams free of pollution and siltation is important for fish and other aquatic species. Careful planning to avoid erosion, in the building and maintenance of trails, roads, and infrastructure is essential in order to minimize impacts to native plants and animals.
- Second, please protect the natural and scenic qualities, as well as the traditional uses of Queen Wilhelmina State Park. Many Arkansans, as well as visitors from out-of-state, love the park just as it is. They relish the opportunity to enjoy the views, the quiet, the hiking trails, the lodge, and the star-filled night sky. Please keep these treasured aspects of this wonderful park in mind as the bike plan is developed.
- Third, please protect the scenic views along Highway 88 into the countryside below. Also, please protect the views from below, looking up at Rich Mountain itself. These lands have been in public ownership as national forest since the days of Teddy Roosevelt, early in the last century. By keeping this mountain in the largely natural and undeveloped condition in which it has existed for so long, future generations will be able to enjoy the spectacular views from both above and below.

Observations and Suggestions:

After considering the four alternatives presented in the EA, we recommend a combination of

Alternatives 3 and 4. For the Ward Park and Eagleton Zones, we suggest Alternative 3. For the Fire Tower and State Park Zones we recommend Alternative 4. Regarding the Fire Tower and State Park Zones, our concern is that the amount of chairlift and road development required at upper elevations, will result in the degradation of views both from the top as well as the base of the mountain. Foregoing the chairlift in the State Park Zone will eliminate the need for the shuttle pick-up point as trails could instead be directed to the Fire Tower Zone pick-up point. Eliminating roads in this particularly steep area would give better protection for the natural qualities of Mill Creek, and also keep this portion of the middle mountain more natural and undisturbed. Finally, it will protect the scenic views from Queen Wilhelmina State Park looking south.

Considering that this will be development on a large swath of public land, what kind of mitigation will be provided to counteract impact? This was not addressed in the EA.

A full build-out of this project will, by all measures, be the largest bike park in the country.¹ We assume there will be usage fees. Considering that mountain bikers have innumerable opportunities across our state to enjoy their sport free of charge, it is important not to get ahead of estimated demand for such a facility. We suggest that a limited implementation on the lower east end would not only be a more secure investment of the taxpayer's dollar, but that it would be the most prudent decision in order to avoid unnecessary environmental disturbance to the incredible Arkansas resource that is upper Rich Mountain

We sincerely appreciate your consideration of our comments.

Brian Thompson The Ozark Society

¹ <u>A Complete List of the Downhill Bike Parks in the US (2024):</u> Total number of bike parks: 84. Average trail

miles per park: 25. Number of parks with lifts: 75. Of parks with lifts, average number of lifts per park: 1.37. All parks with lifts are also ski resorts offering biking in the summer season.