Oregon
Tina Kotek, Governor

Department of Fish and Wildlife
East Region
61374 Parrell Road
Bend, Oregon 97702
(541) 388-6363
FAX (541) 388-6281

October 4, 2024

Slater Turner, District Ranger
Lookout Mountain Ranger District and Crooked River National Grassland 3160 NE 3rd Street
Prineville, OR 97754
RE: Corral Flat Endurance Trail Project – Draft Decision Notice #62771

Dear Slater Turner,

As the agency mandated with management of Oregon's fish and wildlife (ORS 496.012), the Oregon Department of Fish and Wildlife (Department) is responding to your request for comments on the draft Decision Notice (DN) for the Corral Flat Endurance trail Project (Project). The Project is located approximately 25 miles northeast of Prineville, OR spanning both the Lookout Mountain and Paulina Ranger Districts on the Ochoco National Forest (Forest). The DN proposes adopting the alternative of "Proposed Action" which will designate 51.26 miles of equestrian trails in an area that is heavily impacted from trail routes that are currently unofficial.

The Department responded during the public comment period for the draft Environmental Analysis (EA), and appreciates the time and effort invested into the responses provided by Lookout Mountain and Paulina Ranger Districts staff in the DN. In consideration of some additional information and clarification included in the DN, the Department has the following comments and recommendations.

The Department recognizes the need for the Ochoco National Forest to provide for multiple land uses, including diverse recreation opportunities (DN p. 18). There can also be benefits of officially designating trail routes such as minimizing adverse effects to natural resources through regular maintenance (DN p. 19), and the Department concurs with the need for maintaining trail systems. The Department appreciates the USFS addressing the ongoing issues with motorized use in the area. We fully support the outreach and education practices, restoration of areas damaged by illegal off-road vehicle use, and reinforcement of road closures (i.e., signage, gates, berms, tank traps, boulders, tree falling) included in the Project.

The Department recommended including additional alternatives besides "No Action" or the "Proposed Action" in the Project. We understand that "federal agencies are required by NEPA to evaluate reasonable alternatives to the proposed action (EA p. 7)," but no other alternatives were considered because "…none were proposed during the public scoping period, and no significant issues were raised to warrant development of an alternative (DN p. 19)." In addition, "All channel crossings were visited and assessed by Forest Service personnel, including hydrologist and/or fisheries biologist (DN p. 25)." It appears that biologists concluded that alternatives were not needed (i.e., trail realignment, alternative crossing locations, reduction in number of crossings) within the Project, and the Department disagrees with this finding. There is a lack of

information to support the assessment of current crossing conditions to demonstrate that they are to standards. For example, culverts are present on maintenance level 1 roads but there is no information to demonstrate their present functionality (EA p. 42, DN p. 25). Many of the streams within the Project area are not functioning properly, and the removal of crossings would improve longitudinal function and passage for fish.

Although the Project plans to implement best management practices (BMPs) to maximize soil and water resource protection (DN p. 9), there should be alternatives to completely avoid impacts in riparian habitat conservation areas (RHCAs). In addition, although BMPs such as trail realignment and trail condition monitoring are planned to apply to all crossing site locations (DN p. 9-11), we feel that these descriptions are vague and there is a need to describe the design plans for the entire Project in detail. For example, there are currently more than 1 proposed crossing per mile of trail on average (DN Figure 7). We recommended reducing the number of crossings overall, and constructing bridges rather than hardened fords where crossings are absolutely necessary. However, the only mention of bridges included in the DN is to remove 2 substandard bridges and instead replace with hardened rock crossings (DN p. 2). It is unclear whether trail realignment, crossing relocations, bridge construction, or other avoidance measure will be taken elsewhere in the Project.

If designating more trails is absolutely necessary, we encourage utilizing pre-existing infrastructure which this Project has done by overlapping the route with open system roads, maintenance level 1 roads, and non-system routes including old roadbeds (DN p. 2). Furthermore, there are some areas where the official trail will be rerouted using trail markers to avoid going through wet meadows (EA, p. 30). Even though the equestrian trail has been used for 25 years, this does not mean that the historic roads were constructed in a suitable manner with regards to hydrological and sedimentary impacts. This Project is the opportunity to ensure that the trail is properly sited so there aren't any negative impacts to other uses, especially USFS Region 6 Sensitive species. We strongly encourage avoiding impacts to RHCAs, reducing the trail crossing frequency, implement segments of buck and pole fencing to keep people out of wet meadows instead of relying on people following trail markers, and constructing bridges over hardened fords.

The purpose of INFISH is to "provide interim direction for the protection of habitat and populations of resident native fish outside of anadromous fish habitat…" and the goals establish an expectation of the characteristics of healthy, functioning watersheds, riparian areas, and associated fish habitats. The Project operates under INFISH guidance (DN p. 25), but there is lack of evidence included in the DN and the EA to address how the Project will meet INFISH goals. Having degraded riparian zones is inconsistent with the Forest Plan and INFISH. Management Area-F15 Riparian in the Forest Plan states that riparian areas are among the most critical wildlife habitats on the Forest and fully functional riparian areas are essential for the maintenance of viable fish populations on the Forest (pg. 4-74). The Forest Plan also states that a long-term Forest objective is to maintain or improve all riparian areas to "excellent condition" (pg. 4-35). To be consistent with the Forest Plan and INFISH goals, trails within the RHCA should be removed to the fullest extent possible.

Protecting riparian areas will help the USFS be consistent with the Forest Plan and INFISH goals and lead to the ultimate goal of healthy fish and wildlife populations. Specifically, the Forest Plan states that as a result of fish habitat capability improvement (including watershed/riparian restoration), both anadromous and resident fish numbers are expected to increase in fifty years (EA p. 4-39). So far, joint USFS/ODFW fish population monitoring since 1997 has shown actual conditions to be counter to the desired outcomes. All sampling locations have a declining trend in

fish abundance. There are 2 sampling sites on Howard Creek, which is within the project area (Figure 1). The effects determination of MIIH and continued viability of redband trout and Columbia Spotted Frog at depressed growth rates, depressed spawning and rearing survival rates, and depressed population densities at the project and Forest-scale should not be the goal. As stated above, the Forest Plan goal is to increase populations.

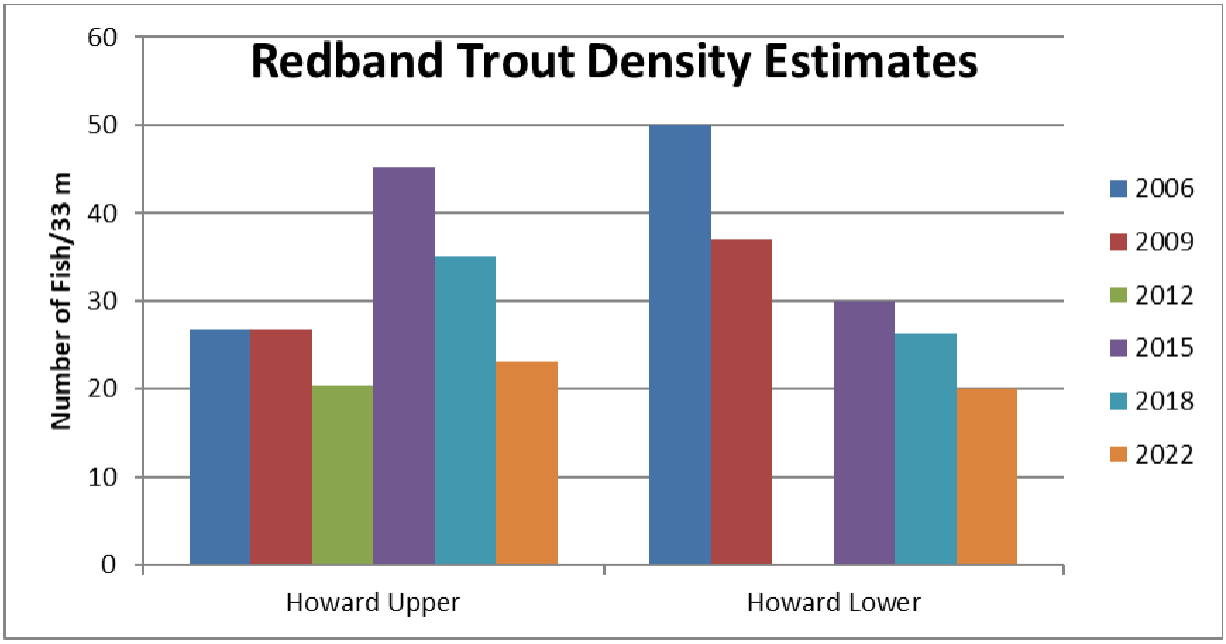


Figure 1: Redband trout sampling. Howard Creek 2006 – 2022.

The Department strongly recommends a rigorous monitoring and maintenance plan, which are technically included in the BMPs (DN p. 9-11). Monitoring trail conditions and water quality is especially important in this area due to the dry nature of the site which would increase the potential for sediment and manure being transported downstream and to ensure consistency with the Forest Plan and INFISH RMOs. Maintenance or improvement of water quality can best be achieved through proper management of entire watersheds at all times, with special attention given to riparian areas (EA p. 4-35). Monitoring and maintenance are both conducted mainly through partner organizations such as equestrian groups (DN p. 18, 22, 26). Although partner organizations can play an important role in monitoring and maintaining trail systems, relying on volunteer groups is not a sustainable solution, nor is it clear that they have the expertise to required to adequately monitor trail conditions. Addressing this ongoing challenge may be outside the scope of this EA, however establishing a long-term monitoring and maintenance plan remains a key constraint in successfully maintaining recreational areas. Water quality monitoring described in the BMP need more detail and should include metrics such as: large woody debris, pool quantity, pool quality, and fine sediment composition, water temperature, amount of fine sediments in spawning substrate, nutrient levels, etc.

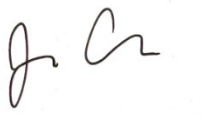
To summarize, the Department strongly recommends:

- Closure of unofficial, user-created trails and roads to ensure protection of core habitat for USFS R6 Forest Sensitive Species.
- Restoration of wet meadows and other natural areas where sites have departed from historic conditions and ecological processes.

- Implement a long-term, sustainable, rigorous monitoring plan that includes a clear definition of who will be conducting the monitoring, and how water quality will be measured and tracked over time.
- Remove trails in the RHCAs. Trails already existing within the RHCAs degrade these areas, which should be improved, not further impacted.
- Define methods and frequency for maintaining the trail system, and who will maintain it.
- Follow INFISH RA-2 when conducting trail maintenance.
- Identify what will happen if the trail is not maintained or detrimental impacts are occurring.
- Reduce number of stream crossings, evaluate fish passage at existing crossings, combine crossings within close proximity to each other, and eliminate unnecessary trail sections.
- Construct bridges rather than hardened fords, where crossings are absolutely necessary.

Thank you for the opportunity to comment. Please do not hesitate to reach out if you have questions or want information that the Department can provide.

Sincerely,



Jessica Clark
Regional Wildlife Habitat Biologist
Deschutes Watershed District
Jessica.s.clark@odfw.oregon.gov
541-388-6099

cc: Sara Gregory – ODFW Deschutes Watershed District Manager
Jamie Bowles – ODFW Ochoco District Wildlife Biologist
Tim Porter – ODFW Assistant District Fish Biologist