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Comments: April 12, 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 Environmental Assessment

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 Environmental Assessment (EA) 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 Project proposes to designate approximately 50 miles of equestrian trails.

The Department recognizes the perceived need for increasing recreation trails, and the pressure on the U.S. Forest Service (USFS) from interested recreation groups. With this, there is a need to address potential impacts on fish and wildlife due to an ongoing increase in recreation, and affiliated land-management projects. The Project EA states that the trail will be "open to other non-motorized recreation user groups", not exclusive equestrian use. The administrative designation of this trail could potentially see an increase in other users to the area, increasing the disturbance on the landscape. This increase in disturbance can have negative impacts on both wildlife and fish.

The Department offers the following comments on the draft EA:

General Comments

The Department has concerns that this EA does not have alternative actions identified, other than the no action. There should be a suite of alternatives identifying other trail options, especially since portions of the proposed trail does have negative impacts on fish, wildlife, and their habitats.

The Management Direction and Guidance section does not include the riparian management area (MA-F15 Riparian) in Table 1 (pg. 4). Since Figure 4 (pg. 11) shows several miles of trail through the Riparian Habitat Conservation Areas (RHCA; portions of watersheds where riparian-dependent resources receive primary emphasis, and management activities are subject to standards and guidelines), MA-F15 Riparian should be added to Table 1. In addition, the number of miles of trail in RHCAs should be included in Table 2 (pg. 5).

When discussing INFISH (pg. 5), the EA should include the goals of INFISH (pg. A-1) and describe how the project will accomplish those goals. 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. In addition, the entirety of RM-1 should be included that states a watershed analysis prior to construction of new

recreation facilities in RHCAs within priority watersheds should be completed. For existing recreation facilities inside RHCAs, assure that the facilities or use of the facilities would not prevent attainment of Riparian Management Objectives (RMO) or adversely affect inland native fish. Relocate or close recreation facilities where RMOs cannot be met or adverse effects on inland native fish cannot be avoided. RA-2 should be added to the pertinent standards and guides to direct trail maintenance.

The Forest Plan is cited as calling for providing 563.6 miles of summer use trails by 2009 (pg. 15). A travel plan should be conducted to see if this number of miles is appropriate given the changes in habitat and priorities. The Forest Plan should be amended to reflect current conditions and objectives.

Wildlife Habitat

Research conducted in Starkey Experimental Forest found horseback riding does have an impact on elk, although not as significant of an impact as other recreation, such as hiking, mountain biking and ATV use (Naylor et al. 2009). Elk disturbed by recreation move away from trails, when humans are present, in the same way the move away from roads and vehicle disturbance (Wisdom et al. 2018). Disturbance can alter elk behavior and impact the amount of time spent feeding and resting, thus negatively affecting body condition, and in-turn reproductive success (Naylor et al. 2009).

The Department strongly recommends:

- *Restrict this trail to horseback and hiking use only. Human disturbance, such as ATV use, mountain biking, horseback riding and hiking is increasing, and projected to continue increasing in coming years (Bowker et al. 2012). The Outdoor Foundation (2016) found the number of mountain bike users increased by 22% between 2006 and 2015, a trend that is seen here in Central OR.

- *Utilize trail counters to monitor use in the area, in addition to other areas open to recreation on the Forest and develop thresholds from these data for excess use. Trail counters on roads and trails, and telemetry collars on wildlife, have been shown to effectively quantify disturbance and document changes in wildlife behavior (Wisdom et al. 2018).

- *Encourage communication with the local recreation community, providing education and enforcement to prevent the construction of user created trails.

- *Close old roads and trails, including user created trails, and support those closures, to create blocks of available habitat.

Riparian Habitat

The EA does not adequately describe the current conditions regarding riparian vegetation along streams, nor does it provide monitoring data related to water quality, or an analysis of potential impacts from the trails. The botany section describes significantly degraded riparian habitat throughout the project area caused by a variety of sources, including past and present recreational trails (pg. 26). 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.

The EA states there are a total of 53 existing trail crossings of RHCA areas (pg. 38). The USFS should be looking for opportunities to minimize stream crossings, especially crossings in category 1 RHCAs. There are opportunities to reduce the number of crossings and unnecessary, small trail sections along tributaries of Crystal Creek and Long Hollow Creek. Some of the tributaries are crossed 2-3 times. Crossings are proposed to be armored or elevated and are required to provide passage where fish are present. It is also unclear how many of

each will be constructed.

We disagree with the statement that there is a relatively low number of stream crossings and the dry nature of the site would minimize the potential for sediment being transported downstream (pg. 38). Fifty-three crossings over 51.26 miles of trail are, on average, greater than 1 crossing per mile. In addition, trails throughout the summer are hot and dry, becoming very dusty. The already described poor condition of the riparian habitat suggests the filtering capability of the riparian vegetation is limited if the dust is captured by surface flow following rain events or snowmelt. This is also a concern considering the amount of horse and cattle manure that can be left on the trail. Not only is there a potential for increased sediment to the stream, there is also the potential for increased nutrients and e. coli to enter streams. The Forest Plan states water quality is to be maintained or improved and must comply with the objectives of the Clean Water Act and Oregon State water quality standards (pg. 4-35). 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 (pg. 4-35).

INFISH also has the goal to maintain or restore water quality, to a degree that provides for stable and productive riparian and aquatic ecosystems (pg. A-1). INFISH goes on to state that monitoring is an important component to verify that the standards and guidelines were applied during the project implementation and to assess whether those protective measures are effective to attain Riparian Goals and Management Objectives (pg. A-15). It is important for the USFS to conduct monitoring to evaluate project impacts on fish, wildlife, and their habitats and to ensure consistency with the Forest Plan. This should include water temperature, sediment inputs, amount of fine sediments in spawning substrate, nutrient levels, and consistency with INFISH RMOs.

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 (pg 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:

- *Implement a rigorous monitoring plan.
- *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, combining those within close proximity to each other and eliminating unnecessary trail sections.
- *Construct bridges rather than hardened fords, where crossings are absolutely necessary.
- *Enact seasonal trail closures to reduce riding during wet conditions.

Even though the equestrian trail has been used for 25 years, this is the opportunity to ensure that the trail is properly sited so there aren't any negative impacts to other uses, especially Forest Sensitive Species.

The Department appreciates the USFS addressing the ongoing issues with motorized use in the area. We fully support the restoration of areas damaged by illegal off-road vehicle use, and reinforcement of road closures (signage, gates, berms, tank traps, boulders, tree falling), but should be done under their authority and not be dependent upon this EA.

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,

Jamie Bowles
Regional Wildlife Biologist
Deschutes Wildlife District

cc:Corey Heath, Deschutes Watershed Manager
Greg Jackle, District Wildlife Biologist
Jerry George, District Fish Biologist
Tim Porter, Assistant District Fish Biologist

Literature Cited:

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