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Organization:

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Comments: 19 October 2021

Wayne National Forest

Rachel Reed, Forest Environmental Coordinator

13700 US Hwy 33 Nelsonville, OH 45764

Attn: Trail Seasonality Forest Plan Amendment

Submitted electronically via: <https://www.fs.usda.gov/projects/wayne/landmanagement/projects>

Dear Rachel Reed:

Thank you for the opportunity to comment on the Trails Seasonality Forest Plan Amendment. We are Athens OH residents who use the Baileys Trail System on average two times per week, for mountain biking, hiking, trail running and bird watching. We have also collectively contributed over 300 volunteer hours in trail maintenance, coordination, and conditions scouting on the system in FY 2021. Our comments on this matter pertain primarily to the Baileys Trail System within the Athens Unit, the area of the Forest that we are most familiar with. Moreover, our main area of first-hand expertise is in mountain bike trail conditions and trail impacts. We are less familiar with OHV and equestrian uses; however we note that both of those uses are associated with impacts that exceed those of mountain bikes, and closures associated with those should be handled with additional caution to protect Forest resources.

We fully agree that the current seasonal trail closure standard in the 2006 Forest Plan (SFW-REC-16) does not adequately meet the current needs and conditions of the Wayne National Forest Trail System. However, the proposed action, which "is to develop Forest Supervisor closure orders establishing a closed season that can be adjusted annually to allow for an extended open season or earlier openings in the spring," while lengthening the permissible season, still contemplates a blanket seasonal closure that is determined "annually" through "pre-season assessments." We recommend instead that the Forest Service adopt an adaptive management approach to closures on the Baileys Trail System that responds to current trail conditions. Mountain biking is a feasible and non-damaging activity when trail conditions are dry or frozen. These favorable conditions are not uncommon in the winter time period that would remain subject to closure under the Amendment, and we maintain that the trails should be open to mountain bikes under these favorable conditions. There is no way to determine in advance for an entire season when those conditions might manifest, and no guarantee that any predetermined closure schedule would match actual trail conditions. For instance, in March 2021, when trails were closed, the highest daily rainfall recorded was 0.79 inches. In late April, when trails were ostensibly open, there was a rainfall exceeding 1 inch.

We believe that a conditions-based open/closed approach is feasible due to a combination of two factors: 1) the Ambient weather stations in Chauncey and Nelsonville, which provide real-time temperature and precipitation data for locations near the trail system; and 2) the active presence of trail volunteers, especially those from the Athens Bicycle Club, who can report on trail conditions on the ground and convey to Forest Service personnel and to the public whether the conditions are appropriate for riding. Baileys Trail System users routinely utilize this approach already during the "open" season, to let others know if it is not feasible to safely use the trails.

We also note that there is a cost to extended trail closures, apart from community economic effects. During the winter closure of 2020-21, volunteers documented extensive damage from "dirt bike" type motorized vehicles, which covered much of the trail system, left tracks that were wider and deeper than a mountain bike, and

required extensive volunteer hours to repair. It is likely that that illegal use was facilitated by the absence of mountain bike user trail presence. Mountain bikers on the Baileys system have also provided directions and shared water with lost hikers, participated in safety exercises, contributed hundreds of trail maintenance hours, and maintain a safety-enhancing presence on the trails and at the trailheads. We urge you to adopt an adaptive, conditions-based approach that allows mountain bike users to utilize the Baileys Trail System when conditions permit, rather than a blanket seasonal closure.

Thank you for your consideration of our comments.

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note 1: See for instance: <https://www.fs.usda.gov/detail/hoosier/news-events/?cid=FSEPRD683832> and https://recpro.memberclicks.net/assets/Library/Trails/comparing_relative_impacts_various_trail_user_groups_keen.pdf

note 2: <https://ambientweather.net/dashboard/f9d237363a91da77494dbf8b5ac7c7ca/graphs>