

Data Submitted (UTC 11): 5/25/2018 7:00:00 AM

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Comments: Please accept the following comments from Oregon Wild regarding the Cowhorn Cutoff and Bunchgrass Ridge Connection Trails. Our concerns fall into four major categories:

1. Inadequate analysis/use of CE
2. Improper response to trail use violations
3. Mountain Bike use prioritized over other uses
4. Need to include any new trails in sustainable recreation strategy

Concerns about inadequate analysis/use of CE

We have serious concerns with these trails projects moving forward using a Categorical Exclusion. The projects have some potential environmental and socio-economic impacts that should be thoroughly analyzed in an Environmental Assessment, and at least one action alternative should be developed and considered to address these impacts. First, we insist that wildlife biologists, botanists, and cultural resources specialists have a chance to analyze the project area sites and impacts. If some version of this proposal advances there will be increased disturbance to wildlife and their habitat due to increased use of the Oregon Timber Trail (OTT) and this proposed new trail construction. Specialists are not afforded the opportunity to do a thorough analysis with a CE. Second, we believe these trail proposals are connected actions to the development, use, and promotion of the Oregon Timber Trail (OTT). No NEPA was done for the OTT, as the roads and trails being used were already on the landscape, but the increased use of those routes may be having impacts that should be analyzed in connection with the proposed new trail construction and use. The proposed new trail construction will only increase use of the OTT, thus the near and long term impacts need to be considered. The Forest Service needs to have an honest accounting of the likely significant increase in disturbance to habitats and other ecological functions due to the advertising of the OTT. Third, alternatives to the proposed new trails should be considered. There are possibilities for alternative routes that do not impact sensitive high-elevation areas and unroaded areas to the extent the current proposals, especially the Cowhorn trail, do. We encourage you to explore those alternatives and mitigation opportunities that may be associated with these trails and increased use. To consider:

- * Possibly decommissioning or moving existing roads, or moving trails with high impacts onto existing roads.
- * Adjust what trails mountain biking is allowed on in the unroaded areas. If it's increased in some areas, other trails could be prioritized for non-bike uses and thus overall the disturbance to wildlife and their habitat is zero sum.
- * For the Bunchgrass extension, we're concerned that the trail will have impacts to the "dispersed recreation, semi-primitive, non-motorized" character of the area, which is also on the edge of a designated roadless area. Impacts of increased use in this area could be mitigated by designing the new trail to be closer to the edge of the roadless area, close to the existing road.

In short, we highly encourage you to only consider new mountain bike trails outside of sensitive areas like unroaded and designated roadless areas.

Concerns about an improper response to trail use violations

The project description and subsequent statements from the USFS indicate that a primary purpose and need for these new trails is to address potential and observed trespass (use of trails not designated for bike use, or illegal cross country travel). We disagree with the justification that in order to stop trespass, you need to build a new trail in the area being trespassed. That's rewarding bad behavior. Enforcement should be your first focus to respond

to "undesirable user behavior", not rewarding such behavior with new trails. Long term this precedent will create more problems than it solves. If mountain bike users are breaking the rules, the first thing that should be done is these users, and organized groups promoting trail use in the area like the OTT Alliance, need to take responsibility for this and find solutions that don't simply move bikes further into sensitive areas. One option in the Cowhorn area is to consider routing the OTT onto a longer stretch of the Windigo Pass Road eliminating the temptation of illegal trespass. In the Bunchgrass area, trespass concerns could be addressed by working with Travel Oregon and the OTT Alliance organization to pay for signs at the appropriate locations to deter people from going into the Waldo Wilderness. These groups have indicated in the past that they would be happy to help with such efforts. The USFS is a partner in the OTTA. It is important that the public, and the groups and agencies involved, understand the Forest Service's relationship with the route's promotion and any agreements around trail system maintenance, cost sharing, and signage. This relationship and agreements would seem essential to ensuring the new (and existing) trails are used properly.

Assessing increased mountain bike use

It is clear that mountain bike use in the Middle Fork Ranger District is increasing and will continue to do so - in part due to the promotion of the area by Travel Oregon and the Oregon Timber Trail Alliance. The impacts of this increased use need to be analyzed, in particular as it relates to ecologically sensitive areas, wildlife, and other recreation uses.

- * These trail proposals are improperly being "analyzed" in a vacuum when they are clearly related to the Oregon Timber Trail use, and will become part of that route.

- * We are concerned that the new trail proposals are being billed as "mountain bike trails." Are these trails intended to be solely for mountain bikes? Please clarify and consider use of these new trails by other users.

- * We have concerns about the location of these trails (as well as other trails designated as part of the OTT) and increased mountain bike use within unroaded areas, and other areas designated for dispersed recreation - fearing that the increased use will make these areas de-facto "focused" recreation areas where this is not compatible with natural values and dispersed, semi-primitive recreation use.

- * These proposals come at a time when Wilderness use in the Central Cascades is seeing unprecedented increases in use, with new fees and permits being proposed. The proposals for construction of new mountain bike trails state that these areas are "becoming more popular" and "popular with mountain bikers". What does this actually mean in terms of numbers? How many people are actually using these trails for mountain biking? How does that compare to other uses? Will planned promotion of the OTT lead to increased overcrowding on that route, and will that impact other users? Are new hiking trails to aid in the well-documented over-use just to the north being considered?

In light of these questions, we suggest the need to consider the long term potential impacts of building and use of these proposed trails, as well as others in the area. Considering these trails as part of a more comprehensive recreation strategy is important. (See below.)

Sustainable recreation strategy

We understand that there are significant costs to the USFS to build, maintain, and manage recreation trails, and that the agency isn't budgeted nearly enough to adequately meet demand for these facilities. We further understand that partnering with user groups and organizations can make a lot of sense to help accomplish needed maintenance and other infrastructure work. We support the idea of convening a group of interested recreation users to inform a sustainable recreation strategy on the Middle Fork Ranger District, and encourage you to ensure that this group is inclusive of all users. We are interested in how such a strategy can help develop long term goals for use and maintenance of trails, and for education of recreationists. We feel it would be prudent to wait on building these proposed new trails until the Middle Fork Trails Assessment begins, and they can be considered as part of that process. We believe that our concerns indicate the need for a more robust

environmental analysis than would be afforded under a categorical exclusion. These proposed new trails have impacts, both on the ground, for wildlife, and for users of public lands. These can only be explored adequately in an EA. In addition, we urge you to reconsider moving forward with these trails until a bigger-picture and long-term look is taken at the future of recreation in the area.

We look forward to talking to you and other USFS staff to discuss ways that the impacts of these proposed trails can be minimized and to explore other, alternative, solutions to improper recreation use and the impacts of the OTT.

Thank you for your consideration.

Chandra LeGue