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Comments: As the agency mandated with management of Oregon's fish and wildlife (ORS 496.012), the Oregon Department of Fish and Wildlife (Department) is submitting comments on the Cowhorn Trail Cutoff (CTC) Categorical Exclusion (CE). While this new trail alignment is comparatively short, the Department is concerned about its placement through relatively undisturbed wildlife habitat as well as its connection to the landscape scale Oregon Timber Trail (OTT). Therefore, the Department recommends the Forest Service prepare an environmental assessment (EA) under the National Environmental Policy Act (NEPA) to evaluate project effects more thoroughly. The CTC is meant to be a connector trail for users of the OTT. Although still under development, the OTT is already a highly publicized "bikepacking" route that spans ~670 miles between Oregon's borders with Washington and California. The CTC is proposed to pass through an area that is important to a number of Forest Plan Management Indicator Species (MIS) including marten, elk, and mule deer. In addition, sightings in the last few years indicate it is possible habitat for the Federally Endangered gray wolf. These species as well as others that are important to forest ecosystem function can exhibit sensitivity to human presence that effectively diminishes habitat functionality. Wildlife biologists at the Deschutes National Forest have recognized the importance of reducing fragmentation of "core habitat areas" where trail and road densities are relatively low. As such, they have developed a "Trail Analysis Process for Wildlife Resources" (Turner and McCormick 2016). Their spatial analysis outlines wildlife habitats by buffering roads and trails according to empirical metrics of species sensitivity to recreation. The Department would like to see this type of analysis applied to the CTC as part of the EA process. Additionally, an EA would outline not only the species that could be impacted by the CTC but the cumulative impacts of the expected recreational use of the trail. Currently the Department has little information on the OTT and its current and predicted use. As recreational demands in central Oregon have been increasing substantially, this information is critical for accurately evaluating effects to natural resources. According to Visit Bend, visitor-days in Bend have increased ~40% during 2010-2015 from 4.7 million to 6.6 million. In 2017, 22% of visitors reported participation in mountain biking, a 6% increase from 2016. Based on the above concerns, the Department believes that the potential present and future effects of the CTC to wildlife and their habitats would be better evaluated by an EA. Thank you for the opportunity to comment. Please contact me if you have questions or to request further information regarding these recommendations. Sincerely, Sara Gregory