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Title:
Comments: Dear Dayle Funka, Thank you for this opportunity to comment on the North Valley Trails Draft EA. We applaud the US Forest Service effort and analysis put forth in the North Valley Trails Environmental Assessment. First, I would like to commend the Taylor River Ranger District on the hard work that was done over the last two years to clean up and spruce up the USFS Lands in the North end of the East River valley. The creation of the Designated Campgrounds, maps and kiosks has truly helped to draw a more responsible crowd. Moving forward, I feel that we have an opportunity to be a model for other National Forest areas; IF we make decisions based on protecting the integrity and beauty of the landscape first and do not bend to requests for more and bigger, for if we cannot see the land for the infrastructures , autos, dust and people, we have exceeded the lands carrying capacity, and we have lost more than we can fix. I am the Senior Range Rider for three of the allotments mentioned in the North Valley Trails Proposal, a proposal which threatens our historical use (over 100 years) in many ways, but most importantly, high density recreation challenges us with the ability to manage livestock correctly and achieve utilization in a timely way amongst large user groups of people from diverse backgrounds. I make the following comments with that foundation. Strand Bonus to 409 Connection: We support Option 2, No new trail construction. We support the Rationale: "This trail is identified as a poor match for the Need for the Proposal. The mixed use on the existing road isn't heavy enough to warrant a parallel trail. This option protects wildlife and livestock habitat." Budd Connection: Ambush to Tent City: We support the generosity of the Budds: and this trail makes sense. We have two concerns, already addressed in the analysis, the first being the trail going through heavy timber prior to the gate entering the Budds property, and the need to clear an escape route for cattle so they don't wind up trapped at that gate. This is a safety issue for equestrians, bikers and cattle. The second item of concern is the actual legal status of the gate not being under either permittee or USFS administration. We ask that there be some protection for ongoing gate closure language to CMBA addressed in the actual easement. We also ask that All new gates on any trail be 4 fit. wide metal swing gate, supported by H-Braces ON BOTH SIDES, (correction EA p. 49) to preserve the integrity of the entire fence line. Also request that H-Braces be installed using USFS fence standards and materials only. Deer Creek to Tent City Connection: We support Option 2, Lower Section Only (Connector Tent City to the Teo/ Deer Creek Road Y). We support the Rationale: Minimize impacts to potential wetlands, wildlife & livestock operations. We add to the Rationale above: The proposed upper section would have been problematic to grazers because of extensive poisonous plant communities in the area of and below the proposed trail. Secondly the upper proposed trail would have effected the use of three major water improvements necessary to off set use and maintain proper riparian management of Deer Creek, the only other dependable water source in that pasture. Teocali Extension: We do not support Option 1 or Option 2. We do not support the Rational. We support the following Rationale: This area is a Gateway to the beautiful Brush Creek area. Allowing so many trails in this small open flat area, within view from all angles totally destroys any feeling of "A Natural Appearing Environment; "and agree that "Due to the open nature of the canyon, new trails will further impair scenic integrity visible from most all vantage points." (EA p. 42) We would support an Option that would instead simply use the recently repaired road; It is safe, it has good visibility and the continued use of it does not further fracture the landscape. A few user friendly wide spots could mitigate the different speeds in which folks like to travel. We also agree that " Mixed use on two track (ML2) roads may be safer than mixed use on a single-track trail." (EA p.49) Inclusion of the user created connection trail adjoins the main road 738 where cyclists and motor cyclists come flying down the hill, very often at high rates of speed, thus creating an unsafe intersection. Though not in the proposal, we also support the closing of the 409.1A , trail across the cliff, to wheeled travel, as it is extremely dangerous. If the proposed trails defined in option 2 are allowed, we question the necessity of Trail 409 as it comes out of the creek and also goes up to the same hairpin curve. Rationale: The combined disturbance from proposed trails , and existing road and trails in this small, geographically low lying setting, will create great amounts of dust. The nature of the flat area beyond the cattle guard, with its lack of natural barriers, lends itself to more user created bare ground, parking and shortcut trails. Both of the Options offered stand to create an almost unmanageable obstacle course for

animals. The cattle which need to graze the face of the hill must also use the steep 409 trail to water in Brush Creek, as it is their only water source. When I step back and look at the Teocali Extension as a whole, I see a very unattractive gateway for our visitors.Brush Creek Trailhead Parking Expansion, Tent City Enhancement: We do support the Brush Creek Trailhead Parking expansion. Once project is completed we would like to see "Parking in those Designated Areas Only." We agree that, for the safety of users, roadside parking should be prohibited between Camp City and the Brush Creek Trailhead Parking Expansion. We would also like to see No Dogs Off Leash Rule in all parking and designated camping areas. We support the Tent City Enhancement as it contributes to improving and making a quality area, which ultimately attracts a more responsible user group. We agree with the use of design features at both Brush Creek Trail head Parking and Tent City. One of the most negative impacts from developed camping and parking lots is the suns' reflection shimmering off of a hundred windshields, all day long, every day, which can be seen like a landmark , insulting the views, from many, many miles away. The most important thing that could be done in this entire project would be to mitigate this visual irritant with the proposed use of intermittent berms and trees planted in a natural way; finished off with a simple pole fence and a cattle guard. We also support paid use of both parking and camping. I was stunned by the Environmental Assessment, (p.50), Management Capacity: "With deep reductions in agency workforce and budgets and substantial increases in recreation use, the deferred maintenance backlog for recreation infrastructure has grown tremendously. Non-motorized trails have been chronically and deeply underfunded for many years. Its no longer possible to adequately perform routine annual maintenance so trails fall into despair and contribute to the backlog." Short term solutions to a long term problem, "Occasional congressional earmarks, grants and agreements with partners have made it possible to keep everything open but needs still far outweigh available resources, so the program is unsustainable...there are over 1700miles of non-motorized trails on the GMUG, and funding is far from adequate... " The EA goes on to say "Assuming proposed trails are constructed by partners, this project would initially increase the annual maintenance costs of the trail system-without partners, or external funding the proposed trails will eventually fall into disrepair and increase the deferred maintenance backlog as well."

" Evaluating this project strictly on a cost-benefits basis, only trails and parking areas that improve safety, protect natural resources, or reduce annual or deferred maintenance costs should be constructed." Trampe Ranches observations of the proponents request is that recreation, primarily mountain bikers are the beneficiaries of the North Valley Trails proposed plan. As brought forth in the EA, the US Forest Service is saddled with additional infrastructure to maintain with no identified financial means to cover those increased maintenance and administrative costs, while Permittees and all other users must bare the added pressures that the come with the addition of more. It is certainly something to ponder when we are planning the fun things that we want. Thank you Barbara East.