March 25, 2013

Via electronic mail

Ochoco Summit Planning Team

c/o Ranger Slater Turner, Ochoco National Forest
3160 NE Third Street
Prineville, Oregon 97754
email: comments-pacificnorthwest-ochoco@fs.fed.us

Subject: Ochoco Summit Trail Project Draft Environmental Impact Statement

Crook County, Oregon

Dear Ranger Turner:

Thank you for the opportunity to submit comments on the Ochoco Summit Trail Project Draft Environmental Impact Statement. On behalf of the Juniper Group of the Oregon Chapter of the Sierra Club, I would like to make the following comments on the Proposed Action.

In sum, we support Alternative #1, No Action, for this proposed trail system. We have the following comments on the DEIS:

- **Incompatible Use:** Put in perspective, and by the Forest Service’s own studies, ORV use in the forest represents only 0.2 percent of all recreation activities. This use has been shown to be incompatible with almost all other uses of the forest. Spending $1,000,000 to benefit just 0.2% of the users, when that use has been shown to be incompatible with the vast majority of other uses of the forest, is unwarranted and misguided, and will result in increased and accelerated degradation of the forest ecosystem. The cost-benefit ratio of scenic, environmental and economic values does not pencil out.

- **Sensitive Area Overuse:** The trail system will be on the Forest’s website and attract riders from all over the Northwest. If you build it, they will come. This sensitive area on the forest, with many streams, springs, wetlands and part of the wild and scenic North Fork of the Crooked River, cannot handle this much disturbance. There will be great impacts to all fish and wildlife. The Forest Service should be concentrating motorized use in non-sensitive areas.

- **No Demonstrated Need:** With about 600 miles of designated ORV routes here, Central Oregon already has more mileage of OHV trails than any other place in the nation (East Fort Rock and Millican trails). There is no demonstrated need other than subjective opinion that new trails are needed.
- **Failure to Minimize Damage** - Executive Orders 11644 and 11989 require that the Forest Service, when designating off-road vehicle trails and areas, minimize damage to forest resources (including soil, watersheds, vegetation, or other resources of the public lands), minimize disruption of wildlife and wildlife habitat, and minimize user conflicts. The Travel Management Rule (TMR) at 36 CFR 212.55(b) echoes this minimization requirement. Multiple district courts have found that the Executive Orders and the TMR require the Forest Service to demonstrate that it minimized – not just considered -- impacts when designating ORV trails and areas. The Deschutes must show how the designation of this trail system has minimized the impacts from motorized recreation to these forest resources. This DEIS fails to satisfy that legal requirement.

- **Habitat Impacts:** The new trail system will result in habitat fragmentation, snag and vegetative cover reduction and noise disturbance, all of which will negatively impact wildlife including big game and raptors.

- **New Trails:** The proposed ORV trail system is 170 miles, which includes 69 miles of new OHV trails with 142 wetland crossings that include bridges, culverts and fords (17.2 miles in Riparian Habitat Conservation Areas). In many sub-watersheds analyzed in the DEIS, road density will increase rather than decrease and new OHV roads will be constructed within 300 feet of intermittent or perennial streams, which, according to the DEIS, will result in increased sediment loading and decrease bank stability. Despite the indication otherwise, these results are directly contrary to Executive Order 11990, which provides that agency avoid adverse impacts associated with the destruction or modification of wetlands. The effects of Alternative 2 on wetlands and streams will also be contrary to Forest Plan goals, objectives and Standards and Guidelines related to water quality, wetlands and turbidity.

- **Noise:** An increase in noise from OHVs will negatively impact the 98.8% of other users of the forest. The noise will affect and displace wildlife, which has more sensitive hearing than humans. Additionally 276 acres of designated Semi-primitive Non-Motorized, a designation specifically designed to not have impacts of motorized recreation, will have noise levels on a spectrum of over 45 dbs.

- **Fire Danger:** Increased use by vehicles without spark arrestors will increase fire danger. There is no requirement for riders to abide by forest closure rules for fire precaution.

- **Soil:** OHVs create clouds of dust in dry conditions that settles on vegetation, inhibiting growth and removing it from food supply for wildlife. Fragile soil systems will be destroyed, causing loss of moisture and loss of the fungal/microbial ecosystem that nourish the forest.
Erosion due to degraded soil is inevitable with OHV usage. “The Mazama Ash component of the soils provides an erosive potential for the system, especially when on grade.” Ruts and destruction of flora are very difficult to remediate, even after many years. Water quality will be degraded by this erosion and fish habitat will suffer. The DEIS states that soil effects will be “unmeasurable,” (p.100), but the inability to measure impacts does not equate to no impact. In fact, the less measurable the impacts are, the less likely the Forest Service will be able to adequately monitor resulting impacts as the project is implemented.

- **Inadequate Enforcement:** An ODFW survey revealed that fish and wildlife activities generated $2.5 billion in revenue for the state of Oregon, $12 million in Crook County. ODFW has expressed concern that that the Forest Service will not adequately administer, maintain or enforce a developed OHV system. This would result in fish and wildlife impacts and loss of recreational opportunity, putting in jeopardy some of the above-referenced revenue. Without adequate enforcement, rates of OHV abuse rise.

- **Riders Do Not Stay on Trails:** Many studies reveal that riders don't want to stay on trails, whether designated or even user-created. Some OHV'ers will venture off-trail into the forest when the 35-mile loop becomes overused, too familiar, or too short. With increased usage, OHV groups will push for even more designated trails. There is concern that OHV groups and perhaps the Forest Service may have plans for more OHV trail systems in the future, since this 170-mile system includes 53 miles of motorcycle trails (<24" wide) and 35 miles of ATV trails (<50" wide).

In addition, comments submitted by Oregon Wild (Doug Heiken) are incorporated herein by reference.

Therefore, the Sierra Club supports Alternative #1, No Action on the proposed Ochoco Summit Trail Project. The impacts of increased OHV usage on existing forest experiences and values that are currently available in this public land would be too great, and the expenditure of precious funds for just 0.2% of users is not justified. The Ochoco’s would be irreparably degraded should this project plan proceed.

Thank you for your consideration of the above comments on this project. Please continue to include the Sierra Club on additional correspondence and responses related to this project. Correspondence may be sent to the address on file for the Sierra Club in Bend and emailed to mdarzen@gmail.com.
Sincerely,

/s/ Gretchen Valido
Gretchen Valido

/s/ Meriel Darzen
Meriel Darzen

Eastside Forest Committee
Oregon Chapter Sierra Club