



Lindaman, Patricia <tlindama@blm.gov>

Fwd: Mountain of the Rogue Mountain Bike Trail - scoping comments

1 message

MD_Mail, BLM_OR <blm_or_md_mail@blm.gov>

Fri, Apr 4, 2014 at 12:07 PM

To: Nicholas McDaniel <nmcदानie@blm.gov>, Patricia Lindaman <tlindama@blm.gov>

----- Forwarded message -----

From: **Doug Heiken** <dh@oregonwild.org>

Date: Fri, Apr 4, 2014 at 12:05 PM

Subject: Re: Mountain of the Rogue Mountain Bike Trail - scoping comments

To: BLM_OR_MD_Mail@blm.govFROM: Doug Heiken, Oregon Wild | PO Box 11648, Eugene, OR 97440 | 541-344-0675 | dh@oregonwild.orgTO: BLM_OR_MD_Mail@blm.gov,

ATTN: Trish Lindaman, Nick McDaniel

DATE: 4 April 2014

RE: Mountain of the Rogue Mountain Bike Trail EA - comments

Please accept the following comments from Oregon Wild regarding the proposed Mountain of the Rogue Mountain Bike Trail EA. Oregon Wild represents approximately 10,000 members and supporters who share our mission to protect and restore Oregon's wildlands, wildlife and waters as an enduring legacy.

Oregon Wild supports careful efforts to develop low-impact recreation opportunities on BLM lands. We are not sure it fits that description. Mountain bikes disturb soil, pollute streams, spread weeds, increase human presence that disturbs wildlife, and conflict with other lower-impact recreationists. These type of recreation developments must be carefully located, designed, implemented, and mitigated.

We remain concerned about the long-term impacts of this new trail system. What are the cumulative impacts beyond phase 1? Are there resources available to police users and ensure that unauthorized trails will not be built?

The EA is inconsistent on cumulative impacts. Some sections address phases 1 and 2, other such as Appendix I: Fish and Aquatic Resources, only address phase 1. Please disclose how stream resources might be impacted by phase 2?

We remain concerned about unnatural chronic erosion and water quality impacts, especially at stream crossings. The EA has only a very general discussion of conditions are the 7 stream crossings. Site specific analysis would help ensure that the general statements apply to each of the crossing sites.

The project area has some areas with shallow soil and exposed bedrock. What little soil is there needs to stay for waterholding and for wildflowers to grow.

The EA analysis raises our concerns about weeds. The project area already has weeds. The project area has few areas of dense forest cover that might help suppress weeds. Trail construction and use would move weeds from infested to uninfested areas. Remediation would be subject to budget constraints. Weeds are a slow motion explosion that should be considered significant.

Please comply with Executive Order 13112 of February 3, 1999 which provides:

(a) Each Federal agency whose actions may affect the status of invasive species shall, to the extent practicable and permitted by law,

(1) identify such actions;

(2) subject to the availability of appropriations, and within Administration budgetary limits, use relevant programs and authorities to: (i) prevent the introduction of invasive species; (ii) detect and respond rapidly to and control populations of such species in a cost-effective and environmentally sound manner; (iii) monitor invasive species populations accurately and reliably; (iv) provide for restoration of native species and habitat conditions in ecosystems that have been invaded; (v) conduct research on invasive species and develop technologies to prevent introduction and provide for environmentally sound control of invasive species; and (vi) promote public education on invasive species and the means to address them; and

(3) not authorize, fund, or carry out actions that it believes are likely to cause or promote the introduction or spread of invasive species in the United States or elsewhere unless, pursuant to guidelines that it has prescribed, the agency has determined and made public its determination that the benefits of such actions clearly outweigh the potential harm caused by invasive species; and that all feasible and prudent measures to minimize risk of harm will be taken in conjunction with the actions.

<http://web.archive.org/web/20010221124512/http://invasivespecies.gov/laws/execorder.shtml>

Doug Heiken, Oregon Wild
PO Box 11648, Eugene OR 97440
dh@oregonwild.org, 541.344.0675

On Mon, Jun 24, 2013 at 4:24 PM, Doug Heiken <dh@oregonwild.org> wrote:

FROM: Doug Heiken, Oregon Wild | PO Box 11648, Eugene, OR 97440 | 541-344-0675 |
dh@oregonwild.org
TO: BLM_OR_MD_Mail@blm.gov,
ATTN: Trish Lindaman, Nick McDaniel
DATE: 24 June 2013

RE: Mountain of the Rogue Mountain Bike Trail - scoping comments

Please accept the following scoping comments from Oregon Wild regarding the proposed Mountain of the Rogue Mountain Bike Trail. Oregon Wild represents approximately 10,000 members and supporters who share our mission to protect and restore Oregon's wildlands, wildlife and waters as an enduring legacy.

This project involves 5.6 miles of new trails initially, and possibly many more miles later. If this project will be developed in phases, BLM must consider the impacts of the full scope of the proposal to avoid improper project segmentation.

Oregon Wild supports appropriate low-impact recreation on our public lands. Mountain biking can be among those but care must be taken to ensure that trail are located, designed, constructed, used, maintained, and adaptively managed to avoid and minimize adverse effects on soil, water, wildlife, weeds, and other recreation users.

Some of the proposed trails look very steep with lots of switchbacks. These can be dangerous, prone to erosion, unauthorized trail cut-offs by irresponsible users, and rutting as a result of downhill braking.

Please avoid cutting large and old trees during trail and parking lot construction. Routing trails through younger planted stands is preferred.

There also appear to be a lot of stream crossings, especially in sections 1, 5, 7, 23. Trail-stream crossings should be avoided where possible, and thoroughly mitigated where they cannot be relocated.

What is the the land allocation? New mountain biking trails must be carefully considered and may not be appropriate in CHU, LSR, riparian reserves, and key watersheds.

Please consider these issues in further developing this proposal.

Sincerely,

/s/

Doug Heiken, Oregon Wild
PO Box 11648, Eugene OR 97440
dh@oregonwild.org, 541.344.0675