



Gary Larsen  
Mt. Hood National Forest Supervisor  
16400 Champion Way  
Sandy, Oregon 97055

April 29, 2010

RE: Timberline Mountain Bike Trails and Skills Park

Dear Mr. Larsen,

Please consider the following comments from members of the Restore Mt. Hood Coalition as you decide how to proceed on the proposed Timberline Mountain Bike Trails and Skills Park. Our main concerns are:

- RLK & Company's ("RLK") failed to involve key stakeholders in the development of this proposal in its earliest stages of design, thus forgoing the opportunity to incorporate their concerns in the project's design.
- This proposal should not be categorically excluded from full review under the National Environmental Policy Act (NEPA). An environmental impact statement (EIS) is both necessary and appropriate for this project.
- Timberline Lodge is a historic and cultural icon and may be an inappropriate destination for an expansive network of lift assisted extreme mountain bike trails.
- If implemented, this project could cause significant potential harm to soils, water, and wildlife.
- Mt. Hood should study and collect recreation data to justify future recreation management decisions.

### **Key Stakeholders Should Be Consulted Pre-Scoping**

Early this spring, RLK contacted a select few individuals and stakeholders and notified them of their intention to pursue a mountain bike trail network at Timberline. Around this time, Friends of Mt. Hood called for a meeting with RLK and a few other conservation and recreation interests to learn about their proposal. Days before this meeting, the existence of this project was unveiled for the first time on the Forest Service's website under "Projects and Plans," although almost no concrete information was provided. At the meeting, RLK shared more of its plans with the small group. It became obvious that these stakeholders had been called to the table far too late. RLK's representative presented the project as though the first stage of its design was completed and it was too late for stakeholders to actually give meaningful input. The Forest Service and RLK should take a step back and postpone scoping until they can get feedback and meaningfully collaborate with the communities that care deeply about the future of Mt. Hood and the Timberline.

### **This Project is Inappropriate for Categorical Exclusion**

Regardless of which categorical exclusion (CE) is used, a CE is not appropriate here. A categorically excluded project, by definition, cannot individually or cumulatively have a significant effect on the human environment. 40 C.F.R. § 1508.4. A CE, regardless of category, is not appropriate where extraordinary circumstances exist. F.S.H. 1909.15 at 30.3. This proposal gives rise to extraordinary circumstances, including the possible presence of listed or sensitive species and the major changes this project would cause to the historic Timberline area. See *id.* at 30.4.

Timberline Lodge and this particular area are areas of significant environmental and cultural importance. This project would have significant impacts on Timberline's culture and environment, especially soil and wildlife habitat. NEPA's ensures "that environmental information is available to public officials and citizens *before* decisions are made and actions are taken." 40 C.F.R. §1500.1(b). Issuing a CE here would prevent the agency from conducting the kind of analysis necessary to understand the full range of impacts a vast network of lift-assisted mountain bike trails would create and make decisions based on this information. We urge you to immediately revise your plans to authorize this project under a CE.

**Timberline Lodge is a historic and cultural icon and is an inappropriate destination for a vast network of lift assisted extreme mountain biking trails.**

The implementation of this project would drastically change the character of Timberline Lodge, a historic and cultural icon. While a small segment of the population is undoubtedly enthusiastic about the development of lift assisted extreme mountain bike trails at Timberline, this proposal would take away something that many of our friends and neighbors deeply cherish during the summer months at Timberline, relative peace and quiet. For decades, Timberline during the summer has maintained a relaxed atmosphere that is welcoming to a very broad segment of the public. The implementation of RLK's plan could bring hordes of thrill seekers to Timberline and have a substantial impact on the culture of this "people's lodge." It is likely that this change in culture will be off-putting at least a portion of the thousands of people who visit Timberline to view wildflowers and engage in other types of quiet recreation. Such a dramatic change may not be appropriate for Timberline.

**If implemented, this project would cause significant harm to the environment.**

As you are undoubtedly aware, RLK's proposal would have significant environmental impacts. Going downhill at fast speeds, the heavy specialty mountain bikes that would be necessary at Timberline would have significant impacts to soil including defoliation, compaction, and erosion. Water quality in the area, including the headwaters of Still Creek, could be adversely impacted. Wildlife, including listed and sensitive species, would no longer be able to utilize this habitat if RLK was able to put in the vast and growing trail network they have proposed.

As Mt. Hood National Forest and the world as a whole begin to plan for climate change, scientists have agreed that now is a time to strengthen ecosystems, especially those at high elevations, to boost their resiliency. With this project, RLK proposes to do the opposite. The impacts of mountain bikes on bare soil, as

opposed to skis on snow, are extreme. The Forest Service and RLK need to take a hard look, as required by NEPA, at the environmental impacts of this project before proceeding any further. Only once you have more concrete information should you decide whether to allow any version of this proposal to proceed.

**Mt. Hood Should Study and Collect Recreation Data to Justify Future Recreation Management Decisions**

RLK has indicated that they believe this project fills a recreation gap and will keep mountain bikes off other parts of the mountain, but there is little evidence to support this assertion. Indeed, precious little data exists regarding recreation on Mt. Hood. We are concerned about the risk that major decisions about recreation could be made based on anecdotal theories instead of actual data. The Forest Service should dedicate a portion of its resources to the careful study of recreation on Mt. Hood so that it can make the best possible recreation management decisions now and in the future.

We, the undersigned members of the Restore Mt. Hood Coalition, urge you to give these comments careful consideration. We look forward to the opportunity to continue to engage in the process of deciding what is appropriate for both Timberline and Mt. Hood National Forest as a whole.

Sincerely,

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Bark

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