



October 12, 2009

Michelle Lombardo
Mt. Hood National Forest
16400 Champion Way
Sandy, Oregon 97055

Subject: Wildcat Mountain Area Road Decommissioning

Dear Ms. Lombardo:

Trailkeepers of Oregon (TKO) generally supports the Mount Hood National Forest (MHNH) proposals for road closures and decommissioning, especially when improved environmental and recreational outcomes can be achieved as a result of closures.

We offer the following comments on the Wildcat Mountain area proposals, in particular, because this area has long suffered from unlawful activity that harms both the environment and quiet recreation experience on trails in the area. The proposed road closures provide an opportunity to address both the unlawful activities as well as practical limitations for hikers and equestrians posed by the current trailheads.

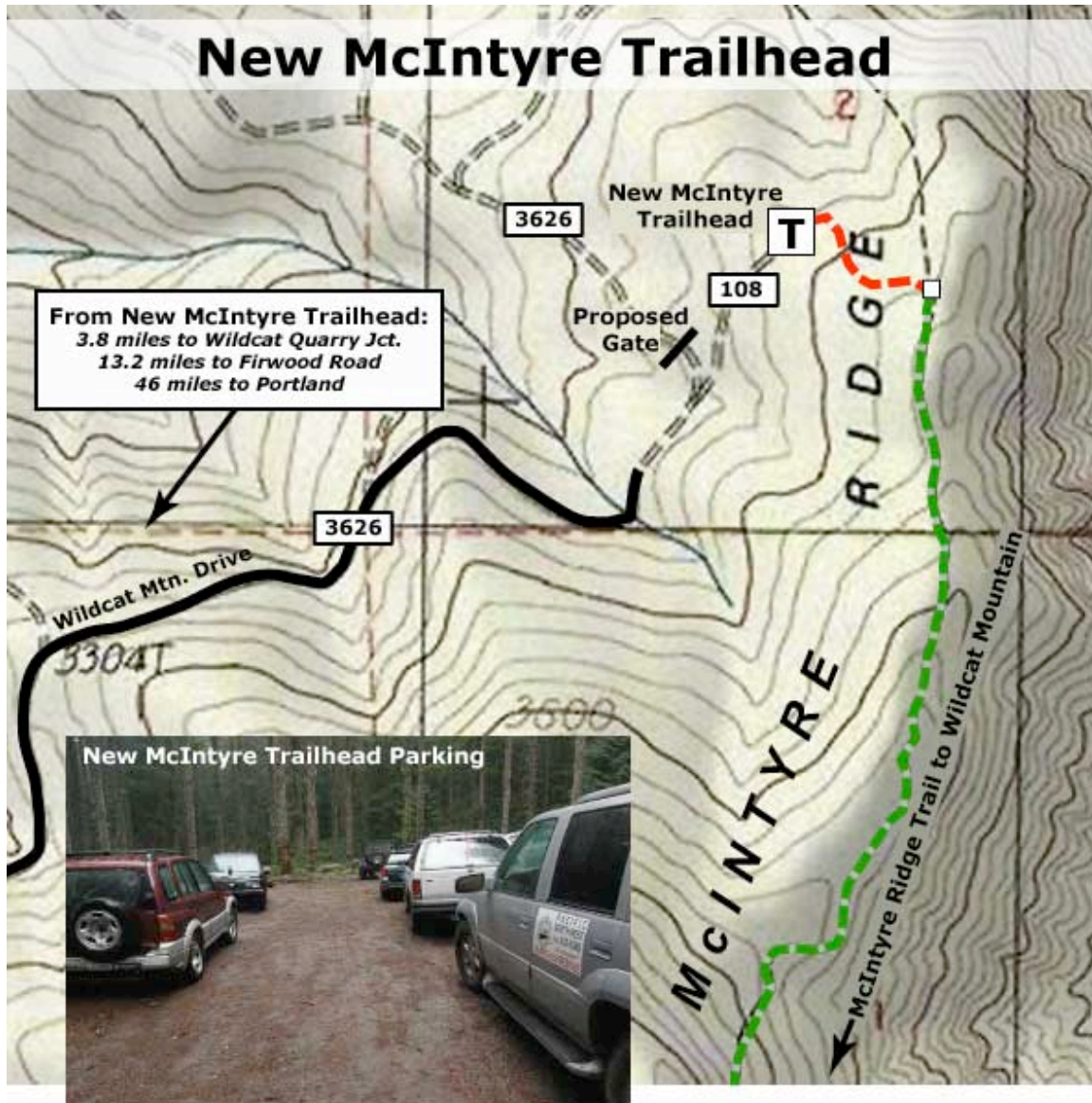
General Comments

The Wildcat Mountain area is a gateway to the Salmon-Huckleberry Wilderness, and its proximity to the Portland metropolitan area makes this one of the most accessible wilderness experiences in Oregon. The recent expansion of the Salmon-Huckleberry wilderness along the west slopes of Wildcat Mountain also highlights the need to reinforce lawful, non-motorized use of the trails that serve the area. Our comments, therefore, focus on the following objectives:

- seeking opportunities to close or decommission deteriorating, unsafe roads by relocating trailheads to safer, more well-traveled routes
- providing an alternative equestrian access to the Wildcat Quarry trailhead, which is proposed for closure
- forming a partnership among the MHNH, TKO and equestrian groups to develop alternative trailheads and connecting trails

McIntyre Ridge Trail (No. 782)

TKO has already made a proposal to the MHNH to develop an alternative trailhead for the McIntyre Ridge Trail. The traditional access, via BLM land and private land off Highway 26, was closed several years ago due to vandalism. As an alternative, TKO proposed establishing a "New McIntyre" trailhead at the terminus of Road 108, using a short, already established use path from this new trailhead to reach the McIntyre Ridge Trail. This proposal is shown on the map below.



We continue to advocate this simple solution, and are pleased that the proposed road closures in this section of the Wildcat Mountain area are consistent with this concept. We support closure of Road 3626 beyond the

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Road 108 junction, and believe this will also help discourage unlawful activities in the area, since it would result in a dead end at a formal trailhead frequented by hikers. TKO would like to partner with the MHNH to complete this project, and believe that it would make a strong candidate for a volunteer-based effort in the 2010 construction season.

Proposed New Wildcat Trail (No. 781-A)

The Wildcat Quarry has long been a magnet for unlawful activity, despite the MHNH ban on shooting in the area. The recent improvements by the MHNH along the Wildcat Mountain Drive corridor were a big step forward in discouraging such activity, but closing the quarry and nearby spur roads will have a much more substantial impact on illegal shooting, dumping and other vandalism. We strongly support closing the quarry for these reasons.

However, we also believe that the MHNH proposal for closures doesn't go far enough in this area, and propose that Road 105 be closed at the junction with Wildcat Mountain Drive (Forest Road 12), thereby closing all of the spur roads that branch from Road 105. The following map shows the extent of our recommended closures, illustrated in blue.



The map also shows a proposed new Wildcat Trailhead along Forest Road 36, (located at an old log yarding area, pictured above) and a proposed new Wildcat Trail connecting to the Douglas Trail near the current quarry trailhead. The new trail would be approximately one mile in length, and located mostly in upland areas in second-growth timber.

This proposal accomplishes several positive outcomes for the forest. First, it closes 4.2 miles of deteriorating spur roads, compared to 1.2 miles in the MHNH proposal. Most of these roads are overgrown and eroding, including the paved sections of Road 105. Most are also within the Eagle Creek watershed, and thus have the potential to impact fisheries there. All have problems with dumping, shooting and other unlawful activities. The eastern portion of Road 105, in particular, where it nearly touches the Douglas Trail, creates an ongoing problem with off-highway vehicles gaining access to the wilderness trail system.

None of these spur roads are needed for public travel, provided that the proposed alternative access to the Douglas Trail is created through a new Wildcat Trailhead and Wildcat Trail. In fact, we believe that the alternative access from the proposed new trailhead would be far more accessible to hikers and equestrians, since it would directly abut paved Forest Road 12, and thereby allow for any vehicle to access the trailhead, where the current approach on Road 150 requires a high-clearance vehicle. This would also make the trailhead more visible to passing traffic and law enforcement, making it more secure for trail users.

Most importantly, the proposed new Wildcat Trailhead and Wildcat Trail would provide an important access point for equestrians who now use the Wildcat Quarry as a trailhead. This is because the existing Douglas Trailhead, located to the west, near the junction with the Eagle Creek Trail (No. 501) is unsuitable for parking trailers and involves an obscure and rough access over private forest land.

The new Wildcat Trailhead also offers an interim solution of access to the Douglas Trail via an unmapped logging spur from the south edge of the trailhead site to Road 105. While not ideal, this would allow users to follow Road 105 and 150 to the old trailhead should the road closures occur before a new Wildcat Trail can be constructed, allowing for immediate closure of Road 150 and its tributaries to vehicles.

TKO believes that the new Wildcat Trailhead and Wildcat Trail projects would be good candidates for volunteer construction, given the close proximity to Portland, ease of access, relatively long construction season and growing interest in the Salmon-Huckleberry trail system. TKO would like to partner with the MHNH and local equestrian groups to realize this project, and envision this as an effort that might fill several work days as a "featured project" in 2010 or 2011.

How We Can Help

In our short history as trail advocates, TKO has built a solid track record, with stewardship projects held at least monthly since April 2007, and co-sponsorship of this year's Trail Skills College, held at Cascade Locks. We

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have also worked closely with other trail advocacy groups, and in particular, the Oregon Equestrian Association, so are able to coordinate volunteer partnerships in tandem with the MHNF. We would like to be part of the New McIntyre and Wildcat trailhead and trail construction opportunities described above, and look forward to partnering with you in making these proposals a reality.

Thank you for considering our comments, and please feel free to contact me with any questions or suggestions on these proposals.

Sincerely,

Jeff Statt
President, Trailkeepers of Oregon