



United States Department of Agriculture  
Forest Service

# **Tracy Ridge Shared Use Trails and Forest Plan Amendment Project**

## **Draft Decision Notice and Finding of No Significant Impact**

**Bradford Ranger District, Allegheny National Forest, Warren and McKean Counties, Pennsylvania**

**July 2017**

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## Table of Contents

Introduction.....	1
Project Area.....	1
Objection Process .....	1
Purpose and Need.....	2
Draft decision .....	3
Reasons for the decision .....	4
Environmental Consequences.....	5
Other alternatives considered.....	5
No Action .....	5
Tribal consultation .....	6
Public involvement.....	6
Findings required by other laws and regulations .....	6
Administrative review and objections process .....	8
Finding of No Significant Impact.....	10
Appendix A: Project Map .....	13
Appendix B: Monitoring and Signage Plan .....	14
Appendix C: Response to comments received during the 30-day comment period .....	15

## Introduction

In December of 2016, an interdisciplinary team at the Bradford Ranger District of the Allegheny National Forest completed the Tracy Ridge Shared Use Trails and Forest Plan Amendment Environmental Assessment in compliance with the National Environmental Policy Act (NEPA) and other relevant Federal laws and regulations. The environmental assessment was made available for review and public comment for 30 days. The team conducted the environmental assessment according to Council on Environmental Quality regulations which state: “Briefly provide sufficient evidence and analysis for determining whether to prepare an environmental impact statement or a finding of no significant impact.”

This decision notice describes my decision on the project and a decision to proceed with an amendment to the Allegheny National Forest Land and Resource Management Plan (referred to elsewhere in this decision notice as the “ANF Forest Plan”), background information about the project, which alternative I selected, and the rationale supporting my decision. This document also includes my "Finding of No Significant Impact" (FONSI) to the human environment, which means no further environmental analysis is necessary in order to proceed with this project. This Draft Decision Notice incorporates by reference the Tracy Ridge Shared Use Trails and Forest Plan Amendment Project Environmental Assessment (EA).

## Project Area

The Tracy Ridge Recreation Area is located in Corydon Township, McKean County and Mead Township, Warren County on Highway 321, 15 miles west of Bradford, PA. The project proposal would convert approximately 12.5 miles of the 34-mile hiking only trail system to shared use – open to hiking and bicycling. (See map in Appendix A.)

The Tracy Ridge trail system is within the Allegheny National Recreation Area. This area was established by Congress in 1984 (Public Law 98-585).<sup>1</sup> The law placed the Tracy Ridge area in a National Recreation Area and established two wilderness area on the Forest – Hickory Creek and Allegheny Islands.

## Objection Process

Regulations require that a Draft Decision Notice be prepared for review as part of the pre-decisional, administrative review process required for projects (36 C.F.R. part 218) and plan amendments (36 C.F.R. part 219). Eligible parties are able to seek resolution of their unresolved concerns regarding the actions outlined in this Draft Decision Notice by filing an objection before a final decision is made. A legal notice will be published to announce the release of this Draft Decision Notice, which initiates a 45-day objection filing period.

Objections regarding the proposed ANF Forest Plan amendment will be accepted only from those who have previously submitted substantive formal comments specific to the proposed plan amendment during an opportunity for public comment, as provided in 36 C.F.R. 219 Subpart A. At a minimum, an objection regarding the proposed amendment must include the following:

1. The objector’s name and address, along with a telephone number or email address if available.

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<sup>1</sup> The enabling legislation is available here: <http://www.wilderness.net/NWPS/documents/publiclaws/PDF/98-585.pdf>

2. Signature or other verification of authorship upon request (a scanned signature for electronic mail may be filed with the objection).
3. Identification of the lead objector, when multiple names are listed on an objection (§ 219.62). Verification of the identity of the lead objector if requested.
4. The name of the plan, plan amendment, or plan revision being objected to, and the name and title of the responsible official.
5. A statement of the issues and/or the parts of the plan, plan amendment, or plan revision to which the objection applies.
6. A concise statement explaining the objection and suggesting how the proposed plan decision may be improved.
7. If applicable, the objector should identify how the objector believes that the plan, plan amendment, or plan revision is inconsistent with law, regulation, or policy.
8. A statement that demonstrates the link between prior substantive formal comments attributed to the objector and the content of the objection, unless the objection concerns an issue that arose after the opportunities for formal comment.

## **Purpose and Need**

The purpose of the Tracy Ridge Shared Use Trail Project is to:

1. address maintenance needs on the Tracy Ridge trail system;
2. better utilize the 34-mile trail system;
3. stimulate new volunteer partners for the trail system; and
4. provide additional high quality mountain bike opportunities on the Forest.

The project is needed for the following reasons:

### ***Address maintenance needs on the Tracy Ridge Trail System.***

Currently, the Tracy Ridge trail system is a 34-mile hiking only trail system. Because of limited resources, the Forest Service has not adequately maintained the system for a number of years. Given the use levels of the area and higher priority trail systems (based on use levels), it is unlikely for the foreseeable future that the Forest Service will dedicate meaningful resources to this system. The area does not have a designated volunteer group that routinely provides trail maintenance. The system has a backlog of maintenance needs including brushing, trail tread work, log-out of down trees and maintenance of drainage structures.

### ***Better utilization of the Trail System.***

As described in Chapter 3 of the EA, use levels of the trail system are relatively low. Use data gathered in summer and fall 2016 confirm what is quite evident throughout the trail system: with the exception of the main travel corridors – Tracy Ridge, Johnnycake Run, and the North Country Trail – many of the trail segments are lightly used. Expanding use of the system to mountain bikers – on only 12.5 miles of

the 34-mile system – would bring another user group into the system. This would allow the area to be enjoyed by another recreating user group.

***Stimulate New Volunteer Partners for the Trail System.***

Increasingly, the Forest Service is relying on partnerships and volunteer groups to provide routine trail maintenance. On November 28, 2016, President Obama signed the National Forest System Trails Stewardship Act. This law directs the Forest Service to pursue partnerships and volunteer assistance to address trail maintenance backlogs. For the Allegheny National Forest, mountain bikers are an untapped resource to address this backlog. Mountain bike groups have an outstanding reputation across the country as strong trail stewards that volunteer their time assisting with trail maintenance. With a system as large as the Tracy Ridge trail system, there is a need for a dedicated volunteer group (or multiple groups) that can assist with the maintenance needs throughout the system. Simply put, continuing to manage Tracy Ridge as a single-user trail system is an unsustainable course.

***Provide additional high quality mountain bike opportunities on the Forest.***

Over the last 20 years, mountain biking has become an increasingly popular and accepted use of public lands. Opening a relatively small portion of the Tracy Ridge trail system to bikes would expand opportunities for this growing recreational use. Importantly, the Tracy Ridge Trails would fill a popular niche for mountain bikers on the Allegheny National Forest. As evidenced by use surveys and research, many mountain bikers are looking for a high quality trail experience that includes single track trails and a backcountry/remote feel. Tracy Ridge fits this niche.

The 2007 Forest Plan contains a number of goals that support the shared use trail proposal at Tracy Ridge. One goal of the Plan is to “provide a diverse range of high quality, sustainable recreation opportunities consistent with public demand and resource capability emphasizing locally popular recreation sites and special features.” Furthermore, the Plan calls for “mapped, marked, and maintained trail system[s] to minimize user conflicts, impacts to natural resources, respond to changing social needs...” Last, the Plan calls for trail systems that “support a wide variety of recreation opportunities and settings” (Forest Plan, p.13). This proposal considers changing social needs and demands and would diversify the current recreational offerings available on the Forest.

Overall, this project has four primary objectives: address the maintenance backlog on the trail system; better utilization of the trail system; stimulation of new partnering opportunities for the maintenance of the system; and the provision of additional, high quality mountain bike opportunities on the Forest. All of these objectives can be accomplished by opening a portion of the system to shared use. In summary, the project proposes to re-purpose an underutilized trail system and provide high-quality recreation for a broader spectrum of users.

## **Draft decision**

After reviewing the environmental analysis, supporting documents and public response, I propose to implement the proposed action as described in the Environmental Assessment (page 5) with the modifications described below.

My decision and findings are based on my knowledge of the area, the Tracy Ridge Shared Use Trails and Forest Plan Amendment Project Environmental Assessment (EA), including the biological assessment and other resource analyses prepared to support the EA (available in the project record), and the 2007 Allegheny National Forest Land and Resource Management Plan (Forest Plan).

My decision implements the following:

1. Allow shared use on approximately 12.5 miles of trail in the Tracy Ridge Recreation Area. This proposal only changes the permitted use of existing trails - no ground disturbance activities are authorized in this planning effort. This decision is subject to monitoring and mitigations that are explained in Appendix B of this decision.
2. Modify the Trail Management Objectives for the system by adding bikes as an “allowable use” on the 12.5 miles of the Tracy Ridge Trail System.<sup>2</sup>
3. A portion of the 12.5 shared use system (approximately 2 miles – indicated on the map as “Segment A”) will remain closed to bikes unless a short loop section is built in the future.<sup>3</sup> During the public comment period, some commenters expressed concern that the proposal was funneling bikes to a “dead-end” connection with a non-bike segment. This “dead-end” trail may cause some riders to inadvertently utilize hiking-only sections of the trail to loop back to the trailhead. This loop connection (less than ½ mile) will allow users to loop back to the trailhead and shared use portions of the system. This decision does not authorize the construction of this loop segment. The new segment will require a separate analysis and decision.
4. Amend the Forest Plan by removing the bike prohibition on the Tracy Ridge trail (Forest Plan, page 31). This amendment does not affect other areas of the Forest.
5. Replace a 1994 Forest Order that prohibits bicycle use on Tracy Ridge trails with a new order that reflects the shared use proposal. (Bikes will remain prohibited on nearly 22 miles of trails in the area.)
6. Implement the monitoring and signage plan as described in Appendix B of this decision document.

## Reasons for the decision

The purpose and need for the project is four-fold: address maintenance needs on the Tracy Ridge trail system, better utilize a portion of the 34-mile system, stimulate new volunteer partners, and provide additional high quality mountain bike opportunities on the Forest. I understand that my decision is unpopular for some. It is, however, consistent with Forest Service policy and relevant laws and regulations, consistent with relevant research and is a sensible compromise that allows the Forest Service to continue offering a robust range of recreational offerings. With the Tracy Ridge system, alone, 22 miles of the 34-mile system will remain hiking only. Across the Forest, approximately 158 miles of trails will remain open to hiking only.

A recurring theme in some comments was that allowing bikes on Tracy Ridge trails will close the door on future consideration of the area for wilderness. I disagree. It is important to note that wilderness is an essential component of the Forest Service's multiple use mandate. Allowing bikes on Tracy Ridge

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<sup>2</sup> The Environmental Assessment proposed to modify the Trail Management Objectives for the trail system by changing the designed use from hike to bike. After considering the use of the trail, I have chosen to add bike as an allowable use. This allows bicyclists to utilize and maintain the trail to current standards. If, in the future, there is a need to change the designed use for the system, a separate planning process will be utilized to make that change. This topic is also covered in the responses to comments #43 and 60.

<sup>3</sup> As of July 2017, the development of a loop in this area has not been proposed. Should a loop be developed in the future, the decision here would allow Segment A to be opened without needing to conduct further NEPA analysis or issue a new decision regarding Segment A.

trails, however, does not jeopardize the area's potential for wilderness designation. As stated in the EA, only Congress can designate wilderness. No evidence has been provided that shows mountain bike use inhibits wilderness designation. Furthermore, Congress, in 1984, designated this area as a National Recreation Area. During plan revision, the Regional Forester considered the area for wilderness study but decided that a National Recreation Area management area was the most prudent approach and consistent with Congressional intent. Under current direction, a Congressional wilderness designation will remove bikes from trails at Tracy Ridge. Nothing in this decision limits the ability for Congress to make this designation.

Some comments ask that the Forest Service provide more specifics as to how the agency will ensure that bikes do not utilize the North Country National Scenic Trail (NCNST). I believe that appropriate signage and education will ensure that bikes remain on the shared use portion of the trail system. The Forest Service will adopt an adaptive management approach to the shared use trail system.

Furthermore, I believe that the one-mile or more buffers between the shared use trails and the NCNST will assist compliance. Also, there are other shared use trails on the Allegheny National Forest that are in close proximity to the NCNST. While bike use of the trail does occur, it is infrequent. I have every reason to expect that this high rate of compliance will continue at Tracy Ridge. In the event, though, of widespread non-compliance with the rules of the system, I will direct the Bradford District Ranger to take the necessary steps to correct the issue and/or reverse this decision. (See Appendix B for more information on the monitoring of the NCNST.)

Overall, this project – as described in the Environmental Assessment – will tap into a reservoir of volunteers and provide additional high quality mountain bike opportunities on the Allegheny National Forest. Mountain bikers have proven to be an invaluable asset on other National Forests across the country. By providing additional opportunities, the Forest can better tap into the volunteer potential of this user group.

## **Environmental Consequences**

The Environmental Assessment contains a thorough analysis of the issues raised during public scoping. These issues were reviewed and analyzed by resource specialists. In addition, the analysis considered the most relevant and updated literature on mountain biking. Based on the information contained in the Environmental Assessment, I believe a Finding of No Significant Impact is prudent for this project.

## **Other alternatives considered**

No other action alternatives were proposed by the interdisciplinary team based on potential resource conflicts. During public scoping, an alternative was suggested that would amend the Forest Plan and designate the Tracy Ridge area as a wilderness study area. Another suggestion was received that would utilize the Forest's road system, including oil and gas roads, as a mountain bike trail network. Both of these alternatives were considered, but not analyzed in detail. Neither meets the project's purpose and need. A discussion of these alternatives is on page 8 of the EA.

## **No Action**

The No Action alternative provides a baseline for comparison of potential effects from the Proposed Action. In this alternative, the current hiking-only management of the Tracy Ridge trail system would continue. The No Action alternative was not selected because it would not meet the purpose and need for the project.



## **Tribal consultation**

The Allegheny National Forest consulted with tribal representatives during the public scoping period (July/August 2016) of the Tracy Ridge Shared Use Trails and Forest Plan Amendment project. This consultation invitation did not generate any comments or request for additional information.

## **Public involvement**

Early public involvement for this project was initiated in November/December 2015. After initial discussions with local mountain biking groups, a proposal was received from the Northern Allegheny Mountain Biking Association and the Western New York Mountain Biking Association. Informal discussions on the project proposal were also held with representatives from the North Country Trail Association and Friends of Allegheny Wilderness.

The Forest Service proposal for the project was first listed in the ANF Schedule of Proposed Actions in July 2016. On July 18, 2016, a scoping proposal explaining the purpose and need for action, as well as the location and proposed action, was mailed to individuals and groups who had expressed interest in the project earlier in the year. This proposal was also posted on the Allegheny National Forest's website. On July 20, 2016, a news release announcing the opening of the scoping period was sent to local newspapers and members of the media. The project received local media attention: both the *Bradford Era* and the *Warren Times Observer* featured articles on the project. In addition, the project was presented and discussed with the Warren County Council of Governments and the Allegheny National Forest Visitor's Bureau.

In July 2016, the project proposal was mailed to representatives from 13 Tribes with an interest in activities on the Allegheny National Forest.

The scoping period ran from July 18 to August 15. During that time, more than 250 comments were received.

On December 23, 2016, the Environmental Assessment for the project was sent to more than 250 individuals that expressed interest in the project during the scoping period. The legal notice appeared in the newspaper of record, the *Warren Times Observer*, on December 26, 2016. The 30-day comment period started on December 27, 2016, and ran to January 25, 2017.

There was strong interest in the project proposal and the information included in the Environmental Assessment. At least three newspapers (*Warren Times Observer*, *Bradford Era*, and *Pittsburgh Post-Gazette*) featured stories on the project. A number of blogs and on-line entities also provided information on the project.

## **Findings required by other laws and regulations**

This forest plan amendment was prepared under the 2012 Planning Rule (36 CFR part 219). As explained below, the amendment process complied with the 2012 Planning Rule's procedural and substantive requirements.

### **Procedural requirements of the 2012 Planning Rule.**

Using the best available scientific information to inform the planning process (§ 219.3). The best available science considered site-specific conditions at Tracy Ridge and mountain-bike related research. This information is documented in the EA on pp. 10-13, 15-16, and 18 and the Biological

Assessment/Evaluation prepared for this EA.

Providing opportunities for public participation (§ 219.4). Opportunities for public participation included a scoping period (July/August 2016) and an EA comment period (December 2016/January 2017).

Format for plan components (§ 219.7(e)). This amendment will result in a change to one plan component: the suitability determination for the Tracy Ridge National Recreation Trail. The determination will be changed from unsuitable to suitable by striking the words “Tracy Ridge” from the language currently provided on page 31 of the 2007 ANF Forest Plan.

The plan amendment process (§ 219.13). The preliminary need for change was identified in the “Tracy Ridge Shared Use Trails and Plan Amendment Project” scoping document and in the Environmental Assessment (pp. 3-5). Both a scoping and EA comment opportunity were provided, and formal notice of the plan amendment process was provided in a legal notice published in The Warren Times Observer July 15, 2016.

Specific information in a decision document (§ 219.14). The rationale for approval required by § 219.14(a)(1) is addressed in the section above entitled “Reasons for the decision.” The substantive requirements of § 219.14(a)(2) are addressed below. Application to previously approved activities, use of best available scientific information, and effective date (required by § 219.14(a)(3), (4), and (6)) are all addressed elsewhere in this section. Since the amendment does not apply to experimental forests or ranges, § 219.14(a)(5) does not apply. As required by § 219.14(b), forest plan documents are available online at [www.fs.usda.gov/land/alleggheny](http://www.fs.usda.gov/land/alleggheny), and planning records are available at the appropriate forest offices.

Whether projects authorized at the time of amendment may continue without change (§ 219.15(a)). There are no previously approved projects that will be impacted by this plan amendment.

Giving public notice (§ 219.16). Public notice is required to initiate a plan amendment, invite comments on a plan amendment, begin the objection period, and approve an amendment. Formal public notices for this project were published in the *Warren Times Observer* on July 15, 2016, (initiation) and December 26, 2016 (inviting comments). A legal notice will be published for the objection filing period, and a notice will be published in the future when a final decision is made.

Setting the effective date for amendments (§ 219.17). The amendment will be effective immediately after the amendment is approved in the final decision notice.

### **Scope and Scale**

This amendment is focused on the allowable uses on a trail system. It is specific to only 12.5 miles of the 34-mile Tracy Ridge Trail System.

### **Applicable substantive requirements of the 2012 Planning Rule.**

I have determined that the following substantive requirements of the 2012 Planning Rule apply to this amendment.

Ecological sustainability (§ 219.8). The amendment will have no impact on the ecological sustainability of the Tracy Ridge area and the Allegheny National Forest planning area. As disclosed in the EA, significant impacts are not expected from this proposal. Additional information is available in pages 24-29 of the EA.

Social, cultural, and economic sustainability (§ 219.8). The amendment will have nominal impact on social, cultural and economic sustainability. By opening up the Tracy Ridge Trail System to another user group, there is a greater likelihood of attracting new volunteers that can assist with long-term maintenance and sustainability of the trail system. Overall, though, the project has little to no impact on the sustainability factors described above.

Diversity of plant and animal communities (§ 219.9). The project is expected to have no impact on plant and animal community diversity (EA pp. 24-29).

Multiple use (§ 219.10). The project is expected to have no impact on the long-range multiple use deliverables envisioned by the Forest Plan, although it will expand the recreation opportunities in Tracy Ridge to include mountain biking.

### **Requirements of the 2012 Planning Rule that are not applicable to this amendment.**

Timber requirements based on the NFMA (§ 219.11). The requirements of § 219.11 do not apply to this amendment because it does not propose any changes to lands not suited for timber production, timber harvest for purpose of timber production, timber harvest for purposes other than timber production, or limitations on timber production.

### **Conclusion**

Based on the above, as supported by the environmental assessment and entirety of the project record, I have concluded that the amendment meets and is not contrary to the substantive requirements of the 2012 Planning Rule.

## **Administrative review and objections process**

This decision is subject to an objection process pursuant to 36 C.F.R. 219, subpart B and 36 C.F.R. 218. These regulations are available at: <https://www.gpo.gov/fdsys/pkg/FR-2012-04-09/pdf/2012-7502.pdf>. Objections will only be accepted from those who submitted substantive formal comments specific to the proposed plan amendment during scoping or the 30 day public comment period. Objections must be based on previously submitted substantive formal comments, unless based on an issue arising after the opportunities for formal comment ended.

A legal notice regarding the availability of this draft decision notice will be published in the newspaper of record, which is the *Warren Times Observer* for this forest plan amendment. A written objection, including any associated attachments, must be submitted within 45 calendar days after publication of the legal notice in the *Warren Times Observer*. However, when the 45-day filing period would end on a Saturday, Sunday, or federal holiday, the filing time is extended to the end of the next federal working day. The date of the publication of this notice is the only means for calculating the date by which objections must be received; do not rely upon any other source for this information.

The notice of objection must be sent to: Objection Reviewing Officer, Region 9, Attn: Administrative Review Staff, USDA Forest Service, 626 E. Wisconsin Avenue, Milwaukee, WI 53202. The notice of objection may be faxed to: 414-944-3963, Attn: Administrative Review Staff, Region 9, USDA Forest Service, Eastern Regional Office. Objections may be submitted by email to: [objections-eastern-region@fs.fed.us](mailto:objections-eastern-region@fs.fed.us). Acceptable formats for emailed objections include plain text (.txt), rich text format (.rtf), portable document format (.pdf), Word (.doc or .docx), or any other format supported by Microsoft Office applications. Hand-delivered objections may be submitted at the above address between 8:00 a.m. and 4:30 p.m., Monday through Friday, except on federal holidays.

## Draft decision

If no objections are filed within the 45-day time period for this draft decision, then a final decision may occur on, but not before, the 5th business day following the end of the objection filing period. The amendment would become effective at the time of decision. If an objection is filed, a final decision will be consistent with the reviewing officer's response to objections.

For additional information concerning this decision, please refer to the Allegheny National Forest web site for the project - <https://www.fs.usda.gov/project/?project=49767>. You may also contact Rich Hatfield at the Bradford Ranger Station, 29 Forest Service Drive, Bradford, PA 16701, or by phone (814) 363-6098) or e-mail ([rhatfield@fs.fed.us](mailto:rhatfield@fs.fed.us)).

DECIDING OFFICER:

/S/Sherry Tune

July 27, 2017

Sherry A. Tune  
Forest Supervisor

Date

## Finding of No Significant Impact

I have reviewed the Council on Environmental Quality Regulations for significance (40 CFR 1508.27) and have determined that this decision is not a major federal action that would significantly affect the quality of the human environment, either individually or cumulatively. Preparation of an environmental impact statement pursuant to Section 102 (2)(c) of the National Environmental Policy Act of 1969 is not required. This determination is based on the following factors as outlined in 40 CFR 1508.27.

### Context

For the proposed action, the context of the environmental effects is based on the environmental analysis in this EA. The Tracy Ridge Shared Use Trail Project was proposed to re-purpose an underutilized trail system. The proposed action would convert approximately 12.5 miles of a 34-mile hiking only trail system to shared use (open to hiking and bicycling).

The Allegheny National Forest has over 170 miles of hiking only trails. This project would reduce that number to 158 miles. This is a 7% reduction in hiking-only trail miles.

The Forest Plan amendment required by this project affects 12.5 miles of trail in the Tracy Ridge area only; it has no impact on other trail systems or recreation areas across the Forest.

### Intensity

Intensity is a measure of the severity, extent, or quantity of effects, and is based on information from the effects analysis of this EA and the references in the Project Record. The interdisciplinary team considered the effects of this project appropriately and thoroughly with an analysis that is responsive to concerns and issues raised by the public. They took a hard look at the environmental effects (both beneficial and adverse) using relevant scientific information and their knowledge of site-specific conditions gained from field visits. This draft finding of no significant impact is based on the intensity of effects using the ten factors identified in 40 CFR 1508.27(b).

Again, as mentioned above the forest plan amendment required by the project does not change the limited intensity of the proposal. The amendment is limited in both scope and intensity. This proposal concerns approximately 12.5 miles of a 34-mile trail system in 9,000-acre recreation area. This represents approximately .08% of the land area within the recreation area.<sup>4</sup>

1. *Impacts that may be both beneficial and adverse. A significant effect may exist even if the federal agency believes that on balance the effect will be beneficial.*

The Environmental Assessment considered both beneficial and adverse impacts related to the Proposed Action. The proposal will provide benefits in the form of additional trail miles open to mountain bikes and the re-purposing of an underutilized trail system. There are not impacts that rise to the level of a significant effect.

2. *The degree to which the proposed action affects public health or safety.*

Implementation of the proposed action will not result in any significant increased risks to public health and safety. The EA considered the safety risks associated with a shared use trail system. Although some members of the public may perceive that mixing hiking and bicycling constitutes a

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<sup>4</sup> For this calculation, the trail width is estimated at 5'.

safety hazard, the data does not support this contention. Shared use trails are quite common across the country, including some trails on the Allegheny National Forest. While there are anecdotal reports of undesirable hiker/biker interactions, there is no clear safety risk involved in shared use trails. Indeed, the conditions at Tracy Ridge (relatively low use, good sightlines and a fairly wide trail tread) should all mitigate the safety risk.

3. *Unique characteristics of the geographic area such as the proximity to historical or cultural resources, parklands, prime farmlands, wetlands, wild and scenic rivers or ecologically critical areas*

There are no historical/cultural resources, parklands, farmland, wetlands, wild and scenic rivers or ecologically critical areas impacted by this proposal. The North Country National Scenic Trail (NCNST) is located within the project area and approximately one mile from the shared use trail system. Effects to the NCNST are disclosed in the EA on pp. 22-23. The proposed action is within a congressionally designated area – the Allegheny National Recreation Area (NRA). This area is also within an inventoried roadless area (IRA). Permitting bicycling on 12.5 miles of an existing trail system, though, does not change the overall character of the NRA or the IRA.

4. *The degree to which the effects on the quality of the human environment are likely to be highly controversial.*

This factor considers the level of scientific controversy associated with the proposed Federal action. Shared use trails are quite common both locally and across the country. Within the Allegheny National Forest, several trails are already shared use. There is no component of this project that would rise to the level of triggering scientific controversy in terms of effects on the quality of the human environment.

5. *The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks.*

No evidence was revealed in any of the components of the environmental analysis, nor is any evidence in the project record that indicates any substantial uncertainty or unknown risks regarding effects of the proposed action. As stated throughout the Environmental Assessment, shared use trails are quite common both locally and nationally.

6. *The degree to which the action may establish precedent for future actions with significant effects or represents a decision in principle about a future consideration.*

The proposed action does not establish a precedent for future actions with significant effects, nor does it represent a decision in principle about a future consideration. This project only considers the 12.5 miles of trail proposed for shared use. It does not authorize mountain bike use on any other hiking-only trails on the Allegheny National Forest. Again, the Forest Plan amendment associated with the project only addresses the 12.5 miles of trail at Tracy Ridge proposed for shared-use.

7. *Whether the action is related to other actions with individually insignificant but cumulatively significant impacts. Significance exists if it is reasonable to anticipate a cumulatively significant impact on the environment. Significance cannot be avoided by terming an action temporary or by breaking it down into small component parts.*

Based on the environmental analysis, no cumulatively significant impact on the environment is anticipated. The EA (pp.27-29) addresses cumulative effects associated with the project.

8. *The degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources.*

The proposed action would have no impact on any districts, sites, highways, structures, or objects listed, eligible for listing, or unevaluated for listing in the National Register of Historic Places.

9. *The degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act of 1973.*

There is no designated critical habitat within the project area. The shared use trail proposal would not adversely affect endangered or threatened species.

10. *Whether the action threatens a violation of federal, state, or local law or requirements imposed for the protection of the environment.*










The proposed action complies with Federal, State, and local laws and requirements established for the protection of the environment. These include the Clean Water Act, Wetlands and Floodplains Executive Orders, the Endangered Species Act, The National Historic Preservation Act, the National Environmental Policy Act, and the National Forest Management Act.



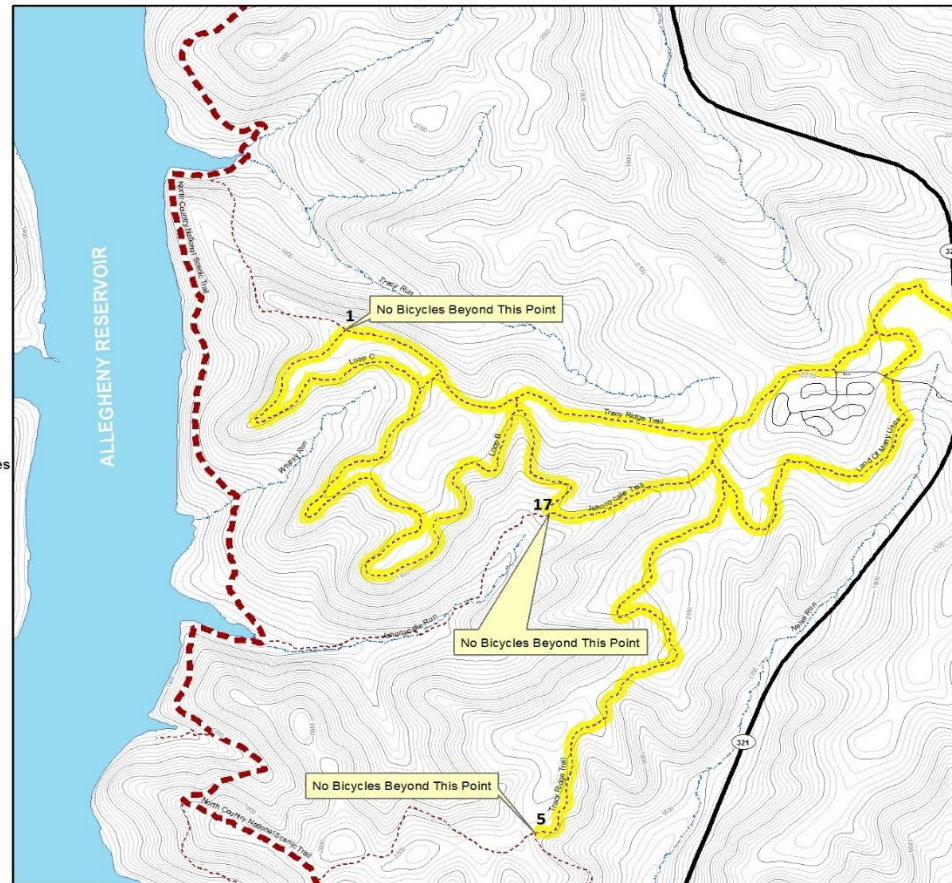
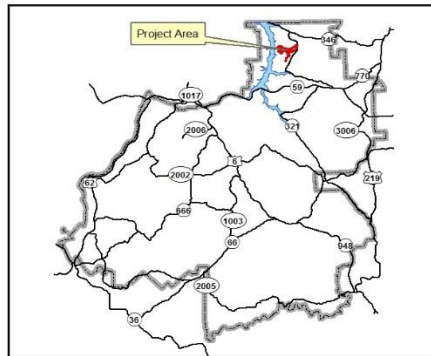
## Appendix A: Project Map

### PROPOSED SHARED USE HIKE/BICYCLE TRAIL DESIGNATION Tracy Ridge Area

Bradford Ranger District  
Allegheny National Forest

-  Proposed Shared Use Trail Designation
-  Existing Trail
-  North Country Trail
-  State or Municipal Road
-  Forest Road
-  Allegheny Reservoir
-  Stream
-  20 Foot Contours
-  100 Foot Contours

0 0.5 1 1.5 2 Miles  
1:36,000



06/13/2016, slk

M/D: T:\FS\NFS\Allegheny\Program\2009\recreation\GIS\workspace\Map\Map\TracyRidgeSharedUseHikeBicycleTrail\recreation1.mxd  
Map Product: T:\FS\NFS\Allegheny\Program\2009\recreation\GIS\workspace\Map\Map\TracyRidgeSharedUseHikeBicycleTrail\recreation1.mxd



## **Appendix B: Monitoring and Signage Plan**

### **Monitoring**

Monitoring will focus primarily on one element: bike trespass on the NCNST<sup>5</sup>. Segments of the NCNST (points 18-7, 7-6, 6-8, 8-9, 9-10, 10-Tracy Run – see map in the EA, Appendix D for the location of these points) will be monitored twice monthly for bike use. Signs of bike use will be logged into a spreadsheet. Information will include the location of the bike use, date, time and extent of trespass. In December of each year, this information will be shared with the Allegheny National Forest Chapter of the North Country Trail Association. This monitoring will occur for two full years after the establishment of shared use on Tracy Ridge trails. In addition, reports from the public of bike trespass on the NCNST will be logged into the spreadsheet. Monitoring and forest patrol officer work will focus on peak weekends when bike use of the shared use trail system is expected to be highest.

If monitoring or public reports indicate a marked increase from current bike use levels on the NCNST, the Forest Service will evaluate and take appropriate action – up to and including – reclosing the system to bikes. Bike use of the NCNST is already prohibited by Forest Order. Violation of the prohibition is punishable by a fine not to exceed \$5,000 or imprisonment of not more than six months or both.

Although increased bike use of the NCNST is not anticipated (see EA pp. 22-23 for a discussion of this topic), if increases are detected, the Forest Service will work closely with the local and national NCTA groups to remedy the situation.

### **Signage**

Signage will be posted that clearly shows the allowable uses on the various trail segments. Kiosk maps and info will be updated to show the trail segments that are shared use. Signage will also be utilized to educate users on the appropriate etiquette for shared use trails.

Signage will be posted in three places on shared use trails that connect to the NCNST: approximately 100 yards before the end of the shared use trail segment, at the end of the segment and approximately 100 yards beyond the end of the shared use segment. There are three trail junctions that will clearly be signed “no bikes beyond this point.” In Appendix A, these junctions are numbered as “5,” “17,” and “1.” Junction “5” has two trail segments that will be signed.

At least monthly, the shared use portions of the trail system will be monitored to ensure that signage is present and in good condition.

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<sup>5</sup> As described in the EA (pp. 22-23), current bike use of the NCNST in the Tracy Ridge area is low – less than five instances annually.

## **Appendix C: Response to comments received during the 30-day comment period**

More than 300 comments were received during the legally noticed 30-day comment period. Many of the comments expressed support or dissatisfaction with the project proposal. Comments not in favor of the proposal tended to emphasize the wilderness values of the area, the impacts of mountain bikes on natural resources, potential for NCNST trespass, and that the Forest should initiate a Forest Plan amendment process to designate Tracy Ridge as a wilderness study area. Some of these comments were previously addressed in the Environmental Assessment in Appendix B. Comments that supported the proposal focused on several points including: the potential benefits of utilizing mountain bikers as trail stewards of the area, the desirability of “backcountry” bike riding opportunities, the positive economic benefits of mountain bike-related tourism, and the research that supports findings in the EA.

The response to comment section below responds to comments that directly address the content in the Environmental Assessment. The section is organized by EA Chapters. In most cases, public comments are directly quoted below. In other cases, the public comment is summarized for this section. Comments below directly address content relevant to the project and the analysis in the EA. The section below is not intended to capture every comment on a particular topic. It does, however, respond to the various perspectives received for each topic.

### **Comments on Chapter 1 - Purpose and Need for Action**

Comment #1: The Forest Service erroneously states that mountain biking is an increasingly popular use. In fact, mountain biking numbers have remained steady at just under 3% of the population. (Commenter #1)

Response: According to the 2016 Outdoor Foundation Participation Study, mountain bike participation has grown by nearly 3% in the last three years. The report is available here: <http://www.outdoorfoundation.org/research.participation.2016.topline.html>. Furthermore, when the sport was experiencing even more significant growth, the Forest did not meet this demand but, instead, closed many trails to mountain biking in the 2007 Forest Plan. There is a sizable unmet demand for mountain biking opportunities – this is particularly evident with the huge success at Jakes Rocks.

Comment #2: The Forest Service seems to think that adding mountain biking to the trail system at Tracy Ridge will also add users for the Campground. This is probably not the case or marginal at best. The reason the Tracy Ridge Campground is not doing very well is that there is a better Campground less than 5 miles away. The Willow Bay Campground just north of the proposed Tracy Ridge Wilderness has dozens of amenities including showers and flush toilets. (Commenter #1)

Response: Increasing use at the Tracy Ridge Campground is not one of the drivers for the project. While allowing bikes on trails at Tracy Ridge may result in a minor increase in campground use, this increase is not expected to change the significant underutilization of the campground.

Comment #3: The Forest Service should look to increase use of the Tracy Ridge Recreation Area by improving the trail map, including group sites in the campground, and sponsoring a “hiking festival.” (Commenter #1)

Response: While these are good suggestions, the agency does not believe that these measures address the purpose and need for the project. As explained on pp. 3-4 of the EA, the project was proposed for four reasons: address maintenance needs on the Tracy Ridge Trail System; better utilize the 34-mile trail system; stimulate new volunteer partners for the trail system; and provide additional high quality

mountain bike opportunities on the Forest. In the end, a 34-mile hiking-only system (outside of wilderness) is not sustainable for the Forest.

Comment #4: Overlooks, like anything else needs to be maintained, especially overlooks in the woods that are not rocky outcroppings. The Forest Service needs to send someone down the hill with a chainsaw to clear the overlooks. This needs to be done every two to 3 years. Of course, if Tracy Ridge does become a Wilderness, that work will have to be done by people with cross cut saws. So, if there are no overlooks on trails that are supposed to have overlooks, no wonder the trails are not being use that much. (Commenter #1)

Response: This comment has been reviewed by the responsible official and is noted. Similar to the comment above, this approach is not expected to appreciably increase use of the system and result in additional volunteer support from users. Introducing a new user group – in this case mountain bikers – will likely bring more volunteers willing to assist with maintenance needs. Indeed, for this proposal two local bike clubs have offered to assist with trail maintenance.

Comment #5: And speaking of the Trails at Jake's Rock, exactly how do they feel about the mountain biking proposal at Tracy Ridge? You would think they would be excited for some more mountain biking opportunities in the Allegheny Forest area. Well, the Trails at Jake's Rock hasn't even mentioned Tracy Ridge on their Facebook Page since the recent comment period began. There are no posts encouraging people to write in comments in favor of mountain biking at Tracy Ridge. The Facebook Page for Jakes Rock touts the Allegheny River as the "River of the Year" They are not coming out against mountain biking at Tracy Ridge, perhaps because they don't want to strain their relationship with the Forest Service, but they don't appear to be overly enthusiastic for it, either. (Commenter #1)

Response: This comment has been reviewed by the responsible official and is noted. This observation has no relevance to the purpose and need for the project.

Comment #6: Have you looked at the map of the trails at Tracy Ridge? It is a really bad map for hiking. The overlook loops are shown really small, and there is no topography on the map. Also, there is no mileage on the map itself, you have to look at a separate chart for mileage. And I also found a couple mistakes on the Tracy Ridge Map. Plus, the map doesn't print out very well for the people at home. It is a good overall map for Tracy Ridge, but if the Forest Service wants more people to hike to the overlooks, perhaps they should have a map just for the overlook trails. Fortunately, there is a Map Illustrator in the house. (Commenter #1)

Response: This comment has been reviewed by the responsible official and is noted. Currently, trail maps on the Allegheny National Forest are developed from a standard template. Both the Minister and Morrison Trail Systems utilize a similar map template and yet attract many more trail visitors than Tracy Ridge.

Comment #7: Yes, you can reserve a group campsite at Tracy Ridge. What happens is that you can reserve a camping loop. The loop can have a maximum of 168 people, 42 cars and costs \$50 a night. I've never seen a Boy Scout Troop with 168 people and 42 cars. Instead, a normal Boy Scout Troop might need a campsite for 15 tents and 5 cars. You can rent a whole loop for your group at Tracy Ridge. So, I propose that the Forest Service create such group campsites by combining 3 or 4 regular campsites. They would have to remove some of the vegetation between those campsites to make it a more open area and have more tent pads. For individual campsites it's good to have vegetation between the campsites for some privacy. But for Group Campsites, a wide open area with clear sight lines is needed so the Scout Leaders can see what's happening around the campsite. (Commenter #1)

Response: This comment has been reviewed by the responsible official and is noted.

Comment #8: I fully appreciate the difficulty FS planners and other officials face in meeting the desires of various user groups – all of which are legitimate – and the legal requirement of multiple use. It is a difficult balancing act. However, I believe the EA is tragically flawed in its assessment of the Tracy Ridge Project. Overall, it seems written from the perspective of trying to structure an EA to support a decision rather than a fair and honest appraisal. Several aspects need to be reexamined and perhaps a totally different alternative found for providing additional mountain biking opportunities. (Commenter #2)

Response: This comment has been reviewed by the responsible official and is noted.

Comment #9: The Proposed Action satisfies the goals of the 2007 Forest Plan to “provide a diverse range of high quality, sustainable recreation opportunities consistent with public demand and resource capability emphasizing locally popular recreation sites and special features,” “respond to changing social needs,” and “support a wide variety of recreation opportunities” (Forest Plan, p.13).

According to the Outdoor Foundation’s 2016 Outdoor Recreation Participation Report, mountain biking has shown an increase in participation over the most recent three year period, ranked third in most favorite outdoor activity and ranked second in frequency of participation (p. 11).

The Proposed Action will take advantage of this growing recreational user group and will provide increased use of trails and the Tracy Ridge campground that have been “underutilized” in recent years. The trails present a unique backcountry experience that many mountain bikers are actively seeking. A recent study of IMBA members indicated that nearly 90% of members prefer a crosscountry singletrack experience. Current mountain biking opportunities in the Forest are restricted to Forest Service roads and ATV trails; and don’t provide the high quality experience that people who ride mountain bikes are earnestly seeking. (Commenter #10)

Response: This comment has been reviewed by the responsible official and is noted.

Comment #10: IMBA and its members believe strongly in sustainable and quality trail experiences. This is clearly evident by the eagerness of IMBA chapters to assist land managers with continued trail maintenance and development. This is also proven in the 2016 IMBA Member Survey that concluded that more than 700,000 hours of volunteer stewardship were performed by IMBA members on public lands across the country in 2016.

We believe the proposal to redesignate the 12.5 miles of trail to shared use to be modest and fair. In addition, it clearly meets the changing needs of the Forest and your visitors with the very significant growth of mountain biking as a sustainable and healthy recreational activity. With over 150 miles of exclusive use hiking trails, including 34 miles at Tracy Ridge, we believe the proposal to be an encouraging beginning for accommodating mountain bikers on the Allegheny National Forest. As an added benefit, we look forward to the resulting partnership between the Forest Service and local IMBA chapters which will help provide much needed maintenance assistance and use of these trails. IMBA chapters have a well established history of providing public land managers with volunteer stewardship services, and encouraging other outdoor recreationists to participate in much needed maintenance activities. (Commenter #10)

Response: Increasingly, the Forest Service needs to rely on user groups to help maintain trails and recreation facilities. The agency greatly appreciates the contributions of IMBA and believes that mountain bikers are a valuable partner and source of volunteerism.

Comment #11: I'm writing this message in support of the statements below cut and pasted from information referenced on the WNYMBA website. I am a resident of Ontario, Canada and many years ago when my preferred form of recreation was backpacking and hiking I made several trips to the Tracey Ridge area and surrounding trails. Years later when my interests changed to mountain biking I no longer visited the area due to not being able to use the trails for mountain biking. I'm very excited about the possibility of new riding opportunities in the Tracey Ridge Recreation Area and the new trails development at Jakes Rocks. These new mountain biking opportunities are what has put this area on our riding clubs radar for a destination to travel to for a riding vacation. (Commenter #19)

Response: This comment has been reviewed by the responsible official and is noted.

Comment #12: Respectfully, I have spent the last ten years dedicating myself to helping folks get outside in the Allegheny National Forest region. This includes mountain bikers, hikers, backpackers, paddlers and fisherman of all skill levels and abilities. I cannot stress enough the effort that has gone into not only bringing folks outside, but getting them involved, and ultimately nurturing them into stewards and ambassadors of our trails and waterways. This is a turning point that we can embrace all user groups - on land and water - and come together to formulate a plan to first maintain the land trails that already exist for mountain bikers and hikers alike (Morrison and Tanbark), and have a later discussion on Tracy Ridge.

In the meantime, let the trail groups that already maintain nearly 100 miles of hike-only trails try to formulate a plan that better maintains Tracy Ridge. As a member of the Allegheny National Forest Chapter of the North Country Trail, I know we already have a trail work date set for that area. I would be willing to take the lead on organizing a trail group exclusively for Tracy Ridge. (Commenter #21)

Response: The Forest Service appreciates the offer to help maintain our more than 200 miles of non-motorized trails. While the Allegheny National Forest Chapter of the North Country Trail provides invaluable maintenance on the North Country National Scenic Trail (NCNST), other trail systems suffer from a maintenance backlog. Popular trails such as Minister Creek and Hickory Creek have deferred maintenance needs. The Forest Service contacted a number of people and groups that expressed interest in the Tracy Ridge area and/or offered assistance for trail maintenance. Two individuals responded to this outreach effort.

The Tracy Ridge Shared Use Trails Project provides an opportunity – by including a completely new user group – to broaden the potential pool of volunteers that can assist with trail maintenance. These volunteers can assist with routine maintenance and help spearhead trail relocation/reconstruction projects that many trail systems on the Allegheny National Forest need. Tracy Ridge, for example, has a portion of trail (along Johnnycake Run) that should be re-routed. The existing trail (as discussed in the EA), should be re-routed to lessen the grade and eliminate much of the fall-line construction. A project such as this would greatly benefit both the hikers and mountain bikers that utilize the trail system. Limiting the pool of volunteers to hikers only greatly reduces the likelihood of the project ever occurring.

Comment #13: Thank you for allowing comments on the Tracy Ridge Project. I am a member of the NY State Trails Council, which works on creating policy for multi-use trails throughout the state. We helped create policies which allow bicycle travel through wilderness designated areas on primitive bicycle corridors to connect forest areas where mountain bicycling trail systems are in place. We also helped the NY DEC come up with their "all trails are open to mountain bicycles unless signed otherwise" policy.

Mountain bicycling is a positive recreational activity and encouraging more people to get outside to enjoy trails also increases your volunteer base to help maintain those trails. Kids are more susceptible to

diseases caused by inactivity and mountain bicycling may help motivate them to get off the couch. There is also a new group that has created a high school mountain bike race series which is statewide and the kids need places to practice and hold races. (Commenter #22)

Response: This comment has been reviewed by the responsible official and is noted.

### **Purpose and Need - Maintenance Needs**

Comment #14: It is also important to note that one of the reasons cited for allowing mountain biking on the Tracy Ridge trail system is to address maintenance needs and increase use. Adding mountain biking will only increase maintenance needs. In reality, a hiking only trail would only require occasional blazing and only nominal work for basic hiking use. (Commenter #2)

Response: Allowing shared use on a portion of the Tracy Ridge Trail System will expand the base of volunteers who can assist with trail maintenance. Currently, there is no organized group that provides routine maintenance for the trail system. The Forest Service does not agree that allowing mountain biking will “only increase maintenance needs” while a hiking trail “only require[s] occasional blazing and ... nominal work ...” Research has shown that mountain biking is no more impactful on trails than hiking.

Comment #15: Also cited a number of times in the Environmental Assessment is the need to ‘log out’ downed trees and limbs from various trail segments. While this may be necessary in more maintained trails, Wilderness trails are managed with the bare minimum of human touch. Instead of removing them, allowing some fallen trees to become natural water bars to slow overland flow and reduce erosion would help maintain the untrammelled nature of Tracy Ridge, and add to the draw for eastern Wilderness seekers. This is especially important as the EA specifies (citing the Pickering research) on page 26 that “For mountain biking it is hard to assess relative impacts as there is little research.” The EA goes on to cite a report for Parks Canada that “indicated that cycling techniques (cutting switchbacks, excessive skidding and braking) might also play a role in erosion.” Leaving the downed trees or partially trimming them to “step-overable” simultaneously reduces the needed for additional, unfunded maintenance by the Forest Service, and prevents erosion that would only be exacerbated by “cutting switchbacks, excessive skidding and braking.” (Commenter #13)

Comment #16: On page 2 it is noted that the trails have become more “wild” due to a lack of funds for maintenance by the ANF. I say this is actually in line with Wilderness Management and designating Tracy Ridge as Management Area 5.2: Wilderness Study Area would ease the burden of trail maintenance on the Forest Service, as they are to be managed in a more untrammelled nature. In order to provide a higher quality experience for mountain bikers, the Forest Service should open up trails that it already has the funds to maintain, and does, to a higher standard than those at Tracy Ridge. (Commenter #13)

Response to comments #15 and 16: The Tracy Ridge Trails are not in wilderness – they are in a congressionally designated National Recreation Area. The current trail classification for this trail is Trail Class 2.<sup>6</sup> While some trees in the tread are to be expected in Trail Class 2, the concept of “step-over” trees is not a standard and becomes an issue when the trail tread is clogged with downed timber.

Comment #17: Disagree with the amount of work currently required on the connectors. I personally walked all of the trails this fall and would estimate 15-20 volunteers with chain saws, could clean them up in two (2) week-ends. I have numerous friends that would volunteer for organized work week-ends.

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<sup>6</sup> The standards can be found here: [https://www.fs.fed.us/recreation/programs/trail-management/documents/trailfundamentals/National\\_Trail\\_Class\\_Matrix\\_10\\_16\\_2008.pdf](https://www.fs.fed.us/recreation/programs/trail-management/documents/trailfundamentals/National_Trail_Class_Matrix_10_16_2008.pdf).



(Commenter #14)

Response: Thank you for your offer of assistance. The Forest Service will contact you for more information on your offer. The system receives occasional, ad hoc volunteer assistance (e.g. in Spring 2017, a volunteer has offered to log out the section of trail near Polly's Run). However, the Forest Service would like to broaden the range of potential volunteers for the system and set up volunteer maintenance schedules that will occur annually.

Comment #18: Assessment of Maintenance Needs on Tracy Ridge

I don't believe the few pictures, apparently taken close to the trailhead, are an adequate assessment of trail conditions. Therefore, on January 19 I drove to Tracy Ridge, a 6-hour, 320 mile round trip, to assess the condition of the sections of trail being considered for shared use.

Most of the route was covered by leaf litter, but some of it had been washed out of the tread by the heavy rain that must have occurred recently. I did not have any difficulty discerning where the trail was. Guided by the diamond shaped white metal blazes and the sawed ends of logs, the trail was subtly obvious as a very slightly depressed area in the leaf litter on the forest floor. There were a large number of blowdowns across the trail; however, less than three dozen over the entire length of the hike required me to break stride to step over. Most of these were on sections that aren't sufficiently constructed to carry even light mountain bike traffic. There were about 6 "leaners" that I walked around rather than under. I suspect these had succumbed to the emerald ash borer and I usually avoid walking under leaners (and ladders). Three or four of the blowdowns required me to stop, sit on them and swing my legs over to the other side. None required crawling under the blowdown or hiking around it.

The dead end 4-5 section had a few places where brush was encroaching on the tread. The power scythes used by KTA's trail crews would make quick work of those. The brush did not slow my progress.

It is my judgment that two sawyer crews each consisting of a certified sawyer and a helper to remove the sawed out sections could in a week remove all the blowdowns requiring a hiker to break stride on these trail sections and also cut out the leaners. (Commenter #17)

Response: As discussed in the response to comment #14, hiking trails do require routine maintenance. This project, as discussed in the response to comment #17, will also broaden the pool of available volunteers.

Comment #19: Having spent the last ten years on all but two land trails in the Allegheny National Forest, these problems are not exclusive to Tracy Ridge. Why are we not addressing maintenance needs on Morrison Trail? It too allows mountain biking and is extremely overgrown and poorly marked in spots. If the plan is to nurture the mountain bike community and stimulate new partners for the trail system at Tracy Ridge, why rush to do that on a trail that is arguably one of the heaviest used by backpackers, when we have a trail system in the same shape that allows mountain biking and is not being addressed? The same thing can be said for Tanbark Trail, which also allows mountain biking. (Commenter #21)

Response: Maintenance needs at Morrison were partially addressed in summer 2016 when portions of the system were logged out. In 2017, Forest Service seasonal staff are continuing to address the maintenance backlog on the system. Segments of the Morrison Trail are constructed as "fall-line" and need to be re-routed. The Forest Service is looking at re-route options for portions of the trail. Large portions of the Tanbark Trail are nearly unrideable for the vast majority of the riding public (e.g. the section of trail from Highway 62 to Sandstone Springs). This trail is addressed in the EA (page 19).

### **Purpose and Need - Better Utilization**

Comment #20: The Proposal and EA consistently refers to these trails as being 'underutilized' by the hiking community as an underpinning and rational of the proposal, but without supplying any benchmark standards or criteria for what would be considered optimal utilization for this area. Tracy Ridge's use levels are compared unfavorably with other hiking destinations in the National Forest but, again, without any context to determine if these other areas may, in fact, be being overutilized. The proposal also glosses over the extent and degree to which use figures for these areas may be skewed by the presence of a trailhead bathroom. Sometimes more use is not ipso facto better use, from either a recreationist's viewpoint or a management perspective. The lack of a substantive use metric and analysis is a major failing to a proposal that then becomes premised upon a subjective, pejorative and nebulous concept of 'underutilization'. (Commenter #16)

Comment #21: A lack of understanding how this trail system is used is apparent. We help hundreds of backpackers and day hikers plan trips in Tracy Ridge every year. It is truly one of the few places you can "get away from it all" in the Allegheny National Forest. Of course folks are not going to utilize a run down campground when they have Willow Bay a few miles down the road, with many more amenities at their fingertips. This does not mean this trail system is not used. (Commenter #21)

Response: The EA (pp. 10-11) describes the current use of the system. Based on both use numbers and conditions, the use is relatively low. As also discussed in the response to comment #62, the Tracy Ridge trail system has been assigned a Recreation Opportunity Spectrum (ROS) of semi-primitive non-motorized. In this ROS, visitors can expect to encounter up to 15 parties when utilizing the trail system. Currently, use levels are far below that metric.

### **Purpose and Need - New Volunteer Partners**

Comment #22: It is also difficult to understand how the proposed action could possibly fulfill the directive outlined in the November 28, 2016, National Forest System Trails Stewardship Act that the Forest Service cites on page 4 of the EA. This law, which directs the Forest Service to "pursue partnerships and volunteer assistance to address trail maintenance backlogs," certainly does not direct the Forest Service to create user conflicts, fail to adequately engage existing user groups who are dedicated volunteers and trail maintainers, or to invite new uses to trail systems that are currently in need of maintenance and not designed for the new use. In fact this law requires that trails meet National Quality Standards for Trails and the Trail Management Objectives identified for the trail. (Commenter #5)

Response: The project represents a wonderful opportunity to tap into another user group to assist with trail maintenance at Tracy Ridge. The EA (p.4) describes this opportunity. The section of the Stewardship Act that the commenter quotes above refers to the stewardship credits for outfitter/guides (see Section 7 of the legislation).<sup>7</sup> The Act does not prohibit the Forest Service from adding uses to existing trail systems.

Comment #23: In the Scoping document for the proposed amendment to the Forest Plan, the ANF cites an inability to maintain the Tracy Ridge trails. Studies have shown that mountain bikers prefer to bike on meticulously maintained trails, and that in order to keep bikers interested in riding the trails, decision makers should be prepared to spend public funds on trail maintenance and develop a plan for additional spending on trail assessments and monitoring in order to obtain the necessary resource protection benefits for users. The ANF believes that volunteers from local organizations interested in biking will relieve them of the responsibility they now have to upkeep the trail for hikers, but the EA provides no

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<sup>7</sup> The text of the bill is available here: <https://www.congress.gov/bill/114th-congress/house-bill/845/text>



concrete evidence of that pledge for support. (Commenter #7)

Response: A portion of the proposal from the Northern Allegheny Mountain Bike Association and the Western New York Mountain Bicycling Association addressed the offer of volunteer assistance. In their October 30, 2015, letter, the Clubs offer volunteer assistance in the form of “clearing brush and downfalls blocking the trail and improvement in drainage, where needed, to keep the trails dry.” The Tracy Ridge trails, particularly the 12.5 miles include for shared use, would greatly benefit from this reliable/predictable volunteer assistance. The research component of this comment is addressed in comment #128.

Comment #24: We believe the proposal to redesignate the 12.5 miles of trail to shared use to be modest and fair. In addition, it clearly meets the changing needs of the Forest and your visitors with the very significant growth of mountain biking as a sustainable and healthy recreational activity. With over 150 miles of exclusive use hiking trails, including 34 miles at Tracy Ridge, we believe the proposal to be an encouraging beginning for accommodating mountain bikers on the Allegheny National Forest. As an added benefit, we look forward to the resulting partnership between the Forest Service and local IMBA chapters which will help provide much needed maintenance assistance and use of these trails. IMBA chapters have a well established history of providing public land managers with volunteer stewardship services, and encouraging other outdoor recreationists to participate in much needed maintenance activities. (Commenter #10)

Commenter #25: The members of Northern Allegheny Mountain Bike Association and the Regional mountain bike community are excited to have this opportunity to re-open 12.5 miles of Tracy Ridge to mountain bike use. We see the potential to create additional mileage to the trail inventory would expand the ever evolving and growing mountain bike tourism including Jakes Rocks, Morrison trail, and Heart’s Content-Tan Bark trails to name a few in the Allegheny National Forest. Namba and its members also see the value and benefit of our already productive volunteer relationship we have with the U.S. Forest Service here in the Allegheny National Forest to improve Tracy Ridge trail. Based on the protections afforded by the National Recreational Area we feel these trails will be kept and maintained as they were originally designed narrow and to exemplify the back country experience. Namba and Wnymba is committed to provide valuable manpower that is a difficult thing for the agency to provide by paid employees. (Commenter #11)

Response to comments #24 and 25: This comment has been reviewed by the responsible official and is noted.

Comment #26: Maintenance help – the Forest Service has done a very poor job getting out their need for help in maintaining the trails. I use this trail system on average 10-15 days per year since 2001. Never have I seen a Forest Ranger and never have I read posted requests for trail maintenance volunteers. Nor has there ever been a flyer put on my windshield. (Commenter #14)

Comment #27: One of the prime reasons given for opening the Tracy Ridge Trail to bicycles is the need for a new source of maintainers. The EA suggests that the system will collapse unless the Proposal is implemented. It states that 'currently there are no organized groups that provide maintenance' on the 34 mile system of trails. Yet, two paragraphs later, it contradicts that assertion when it says that the 'NCTA chapter maintains the NCT portion' which accounts for about 1/3 of the system. Again, what outreach has the ANF done to hiker groups for assistance before concluding that mountain bikers are the only group that can save Tracy Ridge? Indeed, will mountain bikers even actually log-out down trees or will they simply build ramps to juice jumps like they do on other trails in Pennsylvania, turning the system into a biker friendly obstacle course? (Commenter #16)

Response to comments #26 and 27: The EA does not state that the system will “collapse,” rather, it

points out that the current management is unsustainable (EA, p. 4). Currently, approximately nine miles of the system is maintained by the ANF Chapter NCNST. That leaves nearly 25 miles of trail without a dedicated trail steward.

Comment #28: On of the strategies the IMBA uses to persuade land managers to open trails to mountain bike use is the promise of free labor by a force of volunteers. In all fairness, IMBA and local bike clubs do help with trail maintenance and in some cases construction, although construction or rehabilitation require both supervision and experience.

The area from which volunteers can reasonably be expected is NW PA and extreme western NY would include Erie, Cattaraugus, Chautauqua, and Allegany Counties in NY and Erie, Warren, Bradford, Venango, Crawford, Elk, Forest, and McKean Counties in PA. This is very different from places such as the front range of Colorado or southern and central California where IMBA has had success recruiting volunteers. A quick look at census numbers for these counties within a reasonable driving distance for people to adopt a section of trail or to drive to a sponsored weekend trail crew shows all except Erie County, PA to be in population decline since 1980. Erie County, PA's population has been flat since then. It is no secret that young people with an education are leaving these areas for better economic opportunity in distant metropolitan areas. These are the people with the funds and the time to engage in mountain biking. The population is shrinking and with it the potential pool of volunteers.

Add to this the fact that the Jakes Rocks Trail System will need maintenance. While it is currently only 10 miles, as I have indicated it seems funding is in place for the next 10 miles this year and some of what will be the remaining 25 miles in the future. The sponsors of this initiative seem enthusiastic and able to raise funds. I strongly recommend that the Forest Service work with volunteers in the biking community on the maintenance of Jakes Rocks. (Commenter #17)

Response: While the population of the area is decreasing, there remains a dedicated, hardworking group of volunteers who assist with trail maintenance in western NY and northwest PA. The Forest Service believes that this pool of volunteers can be expanded with additional outreach and recreational opportunities. Jakes Rocks will require some volunteer support but there is no reason to think that this system will absorb all of the volunteer resources in the area.

### **Purpose and Need - High Quality Mountain Bike Opportunities**

#### *Addition of Jakes Rocks to Forest Recreation Portfolio*

Comment # 29: The Forest Service should focus mountain bike efforts at Jakes Rocks. Media reports of a \$100,000 donation to the trail system is further proof that the mountain bike opportunities at Tracy Ridge are not needed. (Commenter #1)

Comment #30: In the Scoping document it was repeatedly claimed that “mountain biking has very limited trail options available on the Forest,” yet details more than 100 miles of trails available for mountain biking at Rocky Gap, Willow Creek, Morrison, Tanbark, and Hearts Content. (The Marienville and Timberline ATV trails were arbitrarily left out just because they lie on the ANF’s Marienville Ranger District.) All of these trails have roots and rocks to ride over. It’s a forest. Roots and rocks are ubiquitous.

The Scoping document discusses the 40-mile-plus Jakes Rocks Epic Mountain Bike trail, which is already in use and actively under construction. Also, there are thousands of miles of logging roads spider-webbing across the ANF that are available for mountain biking. There is not even the smallest kernel of truth to the assertion that mountain biking has limited trail options on the ANF. There is no need to open the hiking-only trails at Tracy Ridge to mountain biking.

On page 17 of the EA under “Issue #2 - How would the shared use proposal affect the Forest’s ability to provide various trail/recreation opportunities?” the ANF states: “Some commenters remarked that with the Jakes Rocks trail system under construction, additional mountain bike trails are not needed. Currently, ten miles of trails are constructed at Jakes Rocks (out of 45 miles approved for construction). Funding for the full build out is not yet secured.”

This is false. In a December 22nd, 2016 article in the Warren Times Observer newspaper, Jim Decker, executive director of the Warren County Chamber of Business and Industry was quoted as saying: “We’ve been getting some very generous contributions,” regarding phase two of the Trails at Jake’s Rocks. The Trails at Jake’s Rocks have received a \$100,000 donation from the Community Foundation of Warren County. With \$100,000 in hand, many of miles of trails should be able to be built at Jake’s Rocks. According to their Facebook page, organizers are planning to build 10 miles a year. They have enough money to build 10 miles in 2017 and have made a dent into building 10 more in 2018. There is no evidence anywhere to lead anyone to believe anything other than the full 46-mile Jake’s Rocks Epic Mountain Bike trail will be completed in a reasonably short amount of time. Certainly the waiting period will be nowhere near long enough to justify permanently expropriating the cherished hiking trails at Tracy Ridge for mountain biking.

Solely for the purposes of the EA and trying to get the Project approved, the ANF is disingenuously trying to make it appear as though completion of the Jake’s Rocks Trail project is somehow tenuous and doubtful when in fact they know that the Jake’s Rocks project has tremendous community support (including the support of FAW) and financial backing. The purpose of doing this is to try to project on the public through the power of suggestion that putting mountain bikes on the trails at Tracy Ridge is a somehow urgent task needed to give mountain bikers a place to ride, when in fact the Project is unnecessary and superfluous. (Commenter #7)

Comment #31: The EA ignores the ongoing project mountain bike trail project at Jakes Rocks, while it attempts to explain that MTBers want a more primitive experience. As stated previously, I read somewhere but can't find now, that another 10 miles of MTB trail at Jakes Rocks has been funded. This image of a check for \$100,000 to the Jakes Rocks trails was posted about the same time as the EA which does not reflect the additional 10 miles of MTB trail planned for 2017 construction. The Jakes Rocks trail system plans call for a total of about 45 miles of MTB trail. In discussing the results of surveys and studies on page 18, the EA states: "mountain bikers prefer single track trails that emphasize natural settings, variety, flow, and trail features such as slope and curve." This is exactly how I have read the current open Jakes Rocks trails described. Inasmuch as the entire Jakes Rocks system was designed by an affiliate of the MTBA, I would expect that the sections remaining to be built will continue to be what mountain bikers like. As to the desire of mountain bikers for a "more primitive experience", I can't imagine anything more primitive than putting one foot in front of the other. (Commenter #17)

Response to comments #29-31: While efforts to fund the Jakes Rocks work continue, this has no bearing on the project proposal at Tracy Ridge. The purposes of the project are outlined in the EA on pages 3-5. Focusing efforts at Jakes Rocks will not address trail maintenance needs at Tracy Ridge, better utilization of that system, or provide additional high quality mountain bike opportunities on the Forest. While some commenters suggest that mountain bike use should be focused in one area and one type of experience, a variety of mountain bike trail experiences is desirable – similar to the variety of hiking/backpacking opportunities available on the Forest. As the EA points out (p. 17), there are more than 170 miles of hiking-only trails on the Forest – these trails provide hikers and backpackers with a wide variety of trail and scenic experiences. Surveys of mountain bike users also routinely reflect this desire for a variety of trail experiences. The EA includes citations for some of these surveys. Furthermore, full funding of the Jakes Rocks is years away. Although open to hiking and trail running, Jakes Rocks is being built as a “bike-optimized” trail system. These trails are quite expensive to build –

averaging \$30,000 or more a mile. The \$100,000 referenced in a comment above will build three miles of trail.

Comment 30 suggests that the EA neglected to discuss the ATV trails on the Marienville Ranger District as a mountain bike opportunity. As the EA points out (p.18), though, ATV/motorcycle trails are not favored by mountain bikers. The trails listed in the comment are technically open to mountain bikes but receive nearly no use from bicyclists. This is not a surprise as these trails tend to be graveled and quite wide – at times more of a roaded experience. This is simply not the experience that mountain bikers are looking for. As discussed above, mountain bikers desire a variety of trail experience across an area and they also desire a variety of experience within a trail – for example, some level of slope, sinuosity, and a variety of natural feature and obstacles (e.g. roots and rocks). Roads and ATV trails do not provide this level of trail diversity or interest.

#### *Other Mountain Bike Opportunities on the Forest*

Comment #32: The EA states unequivocally that ‘the Forest provides a robust offering of hiking-only trails that emphasize a remote, backcountry experience. The Forest does not, however, provide a similar offering for mountain bike users.’ This ignores several factors, not the least of which is the number of hikers compared to the number of mountain bikers in the population. It also ignores the many mountain biking opportunities that exist on gated FS roads. The EA states mountain bikers prefer single track trails, but I can assure you having hiked several of the gated and closed roads that several are not much more than single track and I suspect mountain bikers would find them attractive. Another example is that the expansion of the Jakes Rocks system is largely discounted as providing the additional mountain bike trail system mileage desired by mountain bikers. (Commenter #2)

Comment #33: Addressed a number of times in the EA is the need for more mountain bike trails on the ANF. As there is an existing network of trails in better condition and maintained more frequently, I suggest that the Forest open some of those trails up (especially those not in roadless areas) to bicycle use, as they aren’t located in the largest inventoried roadless area on the Forest. (Commenter #13)

Response: Thank you for your comment. The Forest Service is not aware of this “existing network of trails in better condition and maintained more frequently.” Comment #32 suggests that there are roads available that are now “not much more than single track.” No specific roads are included in the comment. Generally, even closed roads retain the roaded experience that is not favored by mountain bikers.

Comment #32 also suggests that there are more hikers in the population than mountain bikers. This is likely true – the above referenced Outdoor Recreation Participation report (see comment #9) found that when all ages are included, hiking is more popular than mountain biking. However, among youth and young adults, bicycling is more popular than hiking. (This includes all forms of bicycling – including road biking.) As disclosed in the EA (p.4), the Allegheny National Forest Management Plan calls for a variety of trail experiences and recreational opportunities.

Comment #34: Provide High Quality Mountain Biking Opportunities – This says it all! But opening forest service roads or using the ATV trails on the East side of Route 321 would provide better quality for all Mountain Bikers. Putting Mountain Bikers on the Tracey Ridge Trails will limit them to a high percentage of only the most experienced riders. Coming down trail 16 to Johnny Cake will not be a ride for an amateur. My definition of “High Quality” in this project is really an endurance test for those most fit. No one will be able to take their eyes off the trail, look around and truly enjoy the surroundings. Who made the determination that “High Quality Mountain Biking” was needed on the ANF? (Commenter #14)

Comment #35: There are two (2) distinct needs here that the Forest Service has combined into one. The need for help maintaining the trails should not be included in the need for Mountain Biking Trails. This was decided back in 2007 and should still be honored. Forest Service roads would be much better than these trails except for only the most experienced riders. I spent time in Moab, Utah this year and most of the trails were friendly to all. I would estimate less than 10% were for only the most experienced. (Commenter #14)

Comment #36: Funding has been secured for the next 10 miles of the Trails at Jakes Rocks, bringing that total to 20 of the over 40 miles proposed. Mountain biking is also allowed on Morrison, Tanbark and Rocky Gap. Why don't we work on taking care of what is available first, then look at opening up new trails. (Commenter #21)

Response to comments #32-36: The EA (pp. 17-20) describes the current trails open to mountain bikes. As discussed in the EA, riding on forest roads, ATV trails etc ... is not considered a high quality mountain bike trail experience.

#### *Tracy Ridge as a High Quality Mountain Bike Experience*

Comment #37: The Tracy Ridge Environment Review even notes that the grade of the trails at Tracy Ridge are "mostly gentle as much of the system is on a plateau." This doesn't even sound like a place that most mountain bikers would like to ride. After all, it's called "Mountain Biking" not "Gentle Grade Biking." People are not traveling all the way to the Allegheny Forest to ride on a beginners trail. They can do that where they live. (Commenter #1)

Comment #38: The Forest Service seems to think that mountain bikers are seeking a remote "backcountry" feel, but in the Schutte Study "solitude" is very low on the scale of being important as a reason for biking. In fact, 1% of the mountain bikers responding state that Solitude is the main reason they pick a mountain biking trail to ride on. Nature/Scenery does rank high on the list, but with no vistas at Tracy Ridge, that is also not much of a factor to draw mountain bikers. Also in the Schutte Study it says that only 8% of mountain bikers enjoy riding on "gentle slopes." Since the Forest Service itself has described the trails at Tracy Ridge as having "gentle grades," well, that means that 92% of mountain bikers will not be attracted to Tracy Ridge. (Commenter #1)

Comment #39: I believe the remote, natural-surface trails at Tracy Ridge are a nice compliment to the busier, machine-built Trails at Jakes Rocks, and the rugged, rocky trails of Morrison/Rimrock Trail. Mountain bikers enjoy variety in trail experiences, and we seek balanced opportunities for recreation on our public lands in the Allegheny National Forest. (Commenter #8)

Comment #40: The EA also consistently labels the Tracy Ridge Trail System as a prospective 'high quality' biking opportunity, but is it really? According to the EA, mountain bikers prefer a single track trail that offers 'variety', 'flow', 'slope', 'curve', 'technicality' and 'sinuosity'. However, in order to allay concerns about user conflict, the trail is described as being wide and flat, or relatively flat with excellent sight lines, or, elsewhere, as having a mostly gentle grade. The pictures of trail segments included in the EA also show a trail that does not conform with bikers' preferences. The EA further states that the machine built Jakes Rock Trail will have the sought after 'flow', as opposed to Tracy Ridge which is 'fairly flat' with 'rooty/rocky uneven tread' which, it says, makes it good for 'beginners and intermediate riders'. This hardly seems to be the constituency that this proposal was supposedly developed for or the type of trail riding these groups reportedly want. The EA also makes the claim that there will be little incursion on the North Country Trail because the trail sections that reach it will be signed as closed to bikes and 'not easily rideable by the casual mountain biker', but the 'casual mountain biker' is not going to be the problem and is not this proposal's targeted demographic. Experience shows that trail sections that are 'not easily rideable' are the very ones coveted by hard-core biking enthusiasts. (Commenter #16)



Comment #41: I found the following statement in the EA to be false: "The Tracy Ridge trails...have a rooty/rocky uneven tread" (page 20). Only the short section 3-17 is rocky, and that is because it goes steeply down the fall line and has been eroded by flowing water as I noted on my survey. No sections covered by the proposed changes are rooty. Perhaps some of the trails that will continue to be closed to buffer the NCNST are rooty and rocky as they descend down toward the NCNST near the reservoir. They were not included in my survey. (Commenter #17)

Response to comments #37-41: As the EA points out (p. 18), mountain bikers prefer single track trails. Currently, roads are open to bikes; they are not getting utilized because it is generally not the preferred experience for the user group. A discussion of Jakes Rocks is included in the EA (p. 20). The terrain at Tracy Ridge, while generally gently sloping, contains enough features that would attract mountain bikers from a wide variety of user levels. Indeed, the Forest Service received a proposal from two mountain bike groups to open the system to bikes. This would seem to indicate an interest in the riding experience offered by the Tracy Ridge terrain and topography. In their request letter, two local mountain bike clubs indicate that the terrain and setting are well suited for mountain biking. The Clubs' interest in the trails in the area, along with an offer of maintenance assistance is included in the request letter.

### **Need to redesign and rebuild system for bikes**

Comment #42: Goal # 4 Provide additional high quality mountain bike opportunities on the Forest is also likely to fail since the proposed action does not redesign the trail for bicycle use. The result will be a further degraded trail which will not give riders an experience to which they will want to return. Further, as a biking trail, the loops and downhill stretches of the sections proposed to be open to bikes are short. The only section of trail that provides some degree of technical interest to mountain bikers are the areas that provide some downhill runs like the loop formed by the Johnnycake Trail—see attached Tracy Ridge Hiking Trail System Map sections 3 to 17, 16 to 17, and 4 to 5 (yellow). However the downhill/uphill runs on the Johnnycake loop (section 3 to 17, and 16 to 17) are only 0.64 or 0.74 miles respectively on a 2.44 mile loop (2 to 3 to 17 to 16 to 15 to 2, orange on attached map). Unfortunately, at the end of the downhill run sections of proposed trail openings there will be the temptation to ride illegally to the reservoir and then on to the NCNST which would create a large loop for bikers willing to ride in prohibited areas. This design will invite conflict, increase trail degradation, create dissatisfaction in both hikers and bikers, and promote alienation of the current hiking user group which contributes significant volunteer maintenance for trails in the area. (Commenter #5)

Comment #43: It is reasonably foreseeable that the trails proposed in this EA to be opened for Bicycle Use will also need to be redesigned for Bicycle Use. Redesign and additional trail construction would be a connected action (40 C.F.R. § 1508.25(a)(1-3))1 to the current proposed action in this EA. As such the proposed action constitutes segmentation. The proposed opening of trails at Tracy Ridge to bicycle use, segments the whole action. In order for the trails to meet the Design Parameter Attributes of the proposed action, and to sustain the new proposed impact without further degradation, illegal riding, and user conflict there must be a redesign of the trail system. (Commenter #5)

Response to comments #42 and 43: A "redesign" of the trail system is not needed. The table below compares the parameters for trails designed for bikes compared to trails designed for hikers. As the table shows, design parameters for the uses are fairly similar and overlap in many places.

Table 1. Comparison of Trail Design Parameters – Hiker/Bicycle.<sup>8</sup>

Trail Design Parameters (Trail Class 2)	Design Tread Width	Design Grade (Target)	Grade Short Pitch Maximum	Design Clearing (Height/Width)	Design Turn Radius
Designed Use Hiker/Pedestrian	6''-18''	5-18%	36%	Height: 6'-7' Width: 24''-48''	2'-3'
Designed Use Bicycle	12''-24''	5-12%	25% (35% - downhill only)	Height: 6'-8' Width: 36''-48''	3'-6'

Although the specifications for trails managed for biking and hiking trails are similar, the Forest Service is only adding bikes to Tracy Ridge as an “allowable” use. Forest Service Handbook 2309.18 (Trails Management Handbook), Chapter 10 (Trail Planning) describes allowable uses at 14.3 and 14.4. In addition, the Tracy Ridge trails summary document (in the project record) provides a summary of the current trail conditions and design characteristics for the trail.

### Proposed Action

Comment #44: Just recently I have moved to Pennsylvania from Oregon, a state who has increasingly supported more opportunities for mountain biking on BLM land as well as National Forest land. I have seen first hand how mountain bike tourism helps support local commerce, increases nature and trail stewardship, and provides more recreational opportunities for generations of users. As a mountain biker I do a significant amount of trail work, as well as take part in forest conservation activities such as invasive species control, water control/management and actions as simple as picking up litter when I see it. The mountain bike community as a whole respects our natural resources and simply wants a fair opportunity to enjoy our natural surroundings as much as any other recreation. I should note I am also a mountain bike guide during the summer months in Oregon. Take a look at studies done regarding the benefits recreational mountain biking has had on a small town such as Oakridge OR where I guide. One such study is listed (link) below. The highlights:

- Mountain biking in Oakridge, Oregon contributes substantial economic activity to a small, isolated community deeply affected by the loss of timber jobs.
- This study was based in Oakridge, Oregon, population 3,201 in 2014. Oakridge is about 45 minutes from Eugene, Oregon and 2 hours from Bend, Oregon. It is completely surrounded by the Willamette National Forest.
- This study addresses the 350 miles of mountain biking trails around Oakridge. Although the study focuses on a single user group, many of these trails are also open to hikers and equestrians. Findings: Mountain bikers make approximately 10,700-15,900 trips to Oakridge per year. Day trip expenditures range from \$20-\$44 per person and overnight trip expenditures range from \$48 to \$63 per person. Mountain bikers spend an estimated \$2.4 to \$4.9 million in Oakridge each year. This accounts for five percent of the local economy, although three businesses estimate that at least 75 percent of their business comes from mountain bikers.  
<https://headwaterseconomics.org/trail/104-or-mtn-bike-tourism-oakridge/> (Commenter #9)

Response: This comment has been reviewed by the responsible official and is noted.

Comment #45: We agree with the validity of the 2007 Forest Plan assertion that 'bicycle use is

<sup>8</sup> This table is taken from the Forest Service's Trail Design Parameters available here:  
<https://www.fs.fed.us/recreation/programs/trail-management/trail-fundamentals/index.shtml>

unsuitable' on Tracy Ridge Natural Recreation Trails based on the 1994 finding that 'the soils and topographic conditions of the area do not support' their use. The Proposal's Environment Assessment (EA) seeks to discount this finding by saying that 'no analysis has been found to substantiate these statements'. However, the EA also tells us that mountain bikes were known to be riding the area prior to the finding, and so we must conclude that there were sufficient problems with that use that triggered the prohibition. It is probable that on-the-ground trail conditions at the time prompted and corroborated the 1994 finding. This also explains why the trails would have been in need of rehabilitation. We believe that deference should be given to the competence of this professional site specific assessment that would have been based upon direct observation. Prohibiting mountain bikes from using the Tracy Ridge Trails was a sound and correct management decision then, and remains one now.

Response: There is no evidence from the 1990s project file that mountain bikes were causing damage to the trails at Tracy Ridge. The cursory review that was used to close the trails to bikes has been discussed in the EA (pp. 33-34). The documentation from the 1990s project file clearly attribute resource damage to heavy hiking use. Furthermore, the portions of trail repaired in the 1990s were mostly sections of the North Country Trail and other trail sections not included in this shared use project. (Commenter #16)

Comment #46: Three of the sections I surveyed are not suitable for mountain bike use: 1-4, 4-5 and 3-17. Section 17-16 has steep sections as it climbs up to the top of the ridge from Johnnycake Run that probably exceed the design criterion proposed in the project, although if 1-4, 4-5, and 3-17 are closed to mountain bikes, this would be a dead end stub of only .65 miles.

At the end of section 1-4, I noted the following: This whole section had about a dozen blowdowns, all stepovers. There were several places where rain had washed the leaf litter off the trail exposing the black top soil. There a couple wet creek crossings which would become mires if crossed by bikes after a rainstorm.

Section 4-5 continued to have the same terrain issues. This section had the most blowdowns of the entire survey hike. It also was the section where brush had encroached on the trail in a few short sections. This section was steeper than the previous section and generally followed Nelson Run downhill on the bluff above it to the west.

The second section clearly not suitable for mountain bike use is 3-17. This 3/4 mile section starts with a gentle downhill but then continues down above Johnnycake Run at about a 30 percent grade for about a half mile, exceeding the trail design standard for "Trail Class 2, Bicycle and Pedestrian Use." Much of the last section between 3 and 17 follows Johnnycake run and is very seriously eroded---not at all suitable for mountain bikes in its current condition.

Section 17-16 climbs fairly steeply back up after the steep descent on section 3-17. Some of the steep sections may disqualify this section from meeting the standards Ranger Hatfield supplied me for Trail Class 2, Bicycle Use. I don't believe it meets the 5-12% target grade overall, and I believe that in the steeper sections it exceeds the 25% maximum grade listed in the USDA FS Manual on page 22 of 48. (The 35% permitted on downhill segments only would not apply since the cyclists could ride the trail in each direction). (Commenter #17)

Response: The Forest Service appreciates the thorough trail review that this commenter provided. The information will be helpful as the District prioritizes maintenance needs across the Tracy Ridge trail system. It is important to note that the review occurred immediately after a significant rain event in mid-January 2017. Undoubtedly, all of the trail systems in the area had running/standing water. As the EA points out (EA, p. 27), the soils in the Tracy Ridge area are well-drained. The Johnnycake Run section of trail is discussed in the EA (pp. 27-28). The trail grades referenced above are not accurate –



for example, the commenter mentions a ½ mile section of the 3-17 trail as having a 30% grade. There is no ½ mile portion of the trail with that grade (this would require nearly 800 feet of elevation loss). The entire section of this trail segment is .74 miles with an elevation loss of 456 feet (2100' at point #3 down to 1644' at point #17 – 12% grade over the entire section of .74 miles of trail).

### **Public Involvement**

Comment #47: The Allegheny Defense Project is concerned that while Bradford District Ranger Hatfield contacted and held meetings with “some” trail stakeholders for his plan that he favored interacting with, he failed to contact the Allegheny Defense Project which proposed the construction of two new bike trails in the Allegheny Forest during the 2007 Plan process (which do not create user conflicts and do not destroy proposed Wilderness Areas but were subsequently ignored by the Forest Service) and submitted those “Allegheny Wild” proposals as part of our 2007 Forest Plan comments. (See our comments submitted for the 2007 Forest Plan and our “Allegheny Wild” proposal submitted to the Forest Service.) He apparently does not know that Allegheny Defense Project members have been involved in trail construction, maintenance and protection including the National Scenic North Country Trail on the Allegheny Forest including bridge construction in the Minister Valley proposed Wilderness Area and have commented on numerous trail proposals and projects. (Commenter #6).

Comment #48: The ANF has disqualified the Project from the beginning, as no forethought has been given to any other consideration than mountain biking on the hiking-only trails of Tracy Ridge. Effectively no input from any other user groups was solicited on this project idea, just mountain bikers. It is obvious that the ANF predecided sometime in mid-to-late 2015 that establishing mountain biking at Tracy Ridge was to be singularly pursued. (Commenter #7)

Comment #49: Stimulate Volunteer Partners - If the Forest Service is so short staffed then they should appeal to everyone for help and do a much better job of communication the need. In reading the EA it focuses on mountain bikers from the beginning to the end for help, and makes only 1 reference to informal meetings with other parties. I consider myself another party and only found out about the project in July of 2016. 7/18 to 8/15 for getting the word out and soliciting input is very narrow window for such a far reaching project. I have to ask “what was the hurry?” It seems that the writing was on the wall from the beginning to put bikes on the trails, and no serious alternatives were truly investigated. (Commenter #14)

Response to comments #47-49: The Tracy Ridge Project included a robust public involvement process. Prior to the release of the Forest Service Proposed Action, informal discussions were held with a number of diverse interests including the Friends of Allegheny Wilderness, NCTA National Chapter, ANF Chapter – NCTA, and the Northern Allegheny Mountain Bike Association. The project was scoped with the public in July 2016 and the environmental assessment was released in December 2016. In addition, numerous newspaper articles and other media provided information on the project.

### **Tribal Consultation**

Comment #50: The EA also fails to identify that the Forest Service has consulted with the Seneca Nation. Tracy Ridge holds spiritual significance for the Seneca Nation. (Commenter #6)

Response: The Forest Service consults with 15 federally recognized Tribes. In July 2016, all of these Tribes were contacted and invited to participate in the project planning and analysis. No comments were received.

## **Comments on Chapter 2 - Alternatives**

Comment #51: The Forest Service should consider designating the NCNST as a separate management area. (Commenter #4)

Response: Thank you for the suggestion. Typically, a new management area would be considered during Forest Plan revision.

Comment #52: Our final comment is not directly related to mountain biking at Tracy Ridge, but it is a good idea nonetheless, and the ANF should implement it as soon as possible. In the “Background” section of last summer’s Scoping document, it is stated that “use of the [Tracy Ridge] campground is quite low – occupancy of the 100+ site campground is rarely above 10%.” In light of this, we recommend that the three western-most loops of the Tracy Ridge campground shown on this map be closed. This would be the loops with sites 1-23, 71-91, and 92-119 shown on the map. These three loops should be permanently closed, all picnic tables and fire rings, etc. removed, bathroom buildings demolished, access roads and parking pads at each site obliterated and replanted with native vegetation, and the acreage formerly occupied by these three loops should subsequently be incorporated into the proposed Tracy Ridge Wilderness Area as MA 5.2. acreage, thus helping to increase the overall ecological integrity of the prospective designated wilderness. This action would also cut down on maintenance costs for the Tracy Ridge campground in general. (Commenter #7)

Response: This suggestion is outside the scope of the project, It was previously addressed in the EA on page 36, comment #18.

## **Comments on Chapter 3 - Environmental Consequences**

### **Issue #1: User conflict and safety concerns**

Comment #53: In general, the hiker is seeking to soak in nature. The mountain biker is seeking a playground and challenge.

The EA goes to great length to downplay this potential conflict, noting the width of the trail, sight-lines, limited trail use etc. Last summer I was on the Tracy Ridge Trail System – all of it – twice with my grandchildren. Having mountain bikers coming down the trail would have been intrusive and potentially dangerous. The ridgetop sections of the trail system are the ideal place to hike with younger children. Are they to watch for bicycle traffic? Are they to get out of the way? And it certainly detracts from the child’s backcountry experience, although I admit that is fairly subjective.

The EA notes that the sense of conflict is high among hikers, but not mountain bikers, as if that is some alleviating factor. Of course mountain bikers do not see a conflict; it is not the mountain biker being impacted. His or her desired experience and perceptions are much different. It is interesting that the EA notes that the mountain biker does not desire to use FS roads, ATV and snowmobile trails, etc. There is no mention that hikers might not want to use a shared mountain bike trail. In fact, the EA puts the onus on the hiker to make accommodations for the mountain biker, no more so than in the statement that hikers can take alternative routes to reach the NC trail in order to avoid mountain bikers. (Commenter #2)

Comment #54: The EA brushes off the many legitimate concerns about user conflict that were part of the public comment from Scoping. The EA cites numerous studies, some of which are 25 years old, about recreational user conflict. Although the Forest Service provides anecdotal information from land managers about what they think is happening on recreational Multi-Use Trails in the Allegheny National Forest and the Allegany State Park, there is absolutely no data of any kind provided or referenced in the EA (certainly nothing site-specific) to either substantiate or refute their assumptions. (Commenter #5)

Comment #55: The EA admits (page 15) that scientific research overwhelmingly demonstrates that “hikers report a diminished experience when encountering bikes on trails,” that “introducing another user group to the Tracy Ridge trail system will undoubtedly increase the potential for user conflict on the trail system,” and that “the shared use proposal would increase the risk of undesirable hiker/bicycling interactions.” No backcountry hiker wants to be in the middle of their hike with their young and vulnerable children, enjoying the serenity and solitude of Tracy Ridge, only to have several mountain bikers rounding a bend and bearing rapidly down on them. Advocating that mountain bikes have access to the hiking-only trails at Tracy Ridge is a singularly irresponsible threat to public safety. The EIS for the Project must fully analyze potential user conflicts and threats of harm to hikers from the “shared use” of having to contend with mountain bikers on historically hiking-only trails. (Commenter #7)

Comment #56: Finally let’s talk about the negative impact to the people currently using the trails. I personally don’t want to be enjoying a nice hike down Johnny Cake or out the Tracey Ridge Trail or any of the connectors and have 20 mountain bikes force me off the trail and frighten away the wild game. You talk about underutilization but I can attest to the many times I have encountered over-night campers on the trails that were dropped off from boats and spent the days hiking the trails and ending at the camp ground for pick-up. It is my sincere desire that this project not be approved for Mountain Bikes and instead a more concerted effort be done to achieve the maintenance required. (Commenter #14)

Comment #57: Although the EA portrays, and downplays, shared use conflict and particularly the diminished quality of experience for hikers as a subjective he said / she said issue, its choice of the Morrison Trail, where bike use is described as being 'somewhat limited' or 'somewhat low', as the prime example of a shared use trail without incidents seems beside the point. The lack of user conflict complaints on the ANF can perhaps be attributed directly to the fact that, according to the EA, shared use trails have 'low bike use' or are 'not favored' for riding. Interestingly, the EA again uses the Morrison Trail as an example of a trail that does not 'show any additional wear from bikes', but why should it if it is seldom ridden? (Commenter #16)

Response to comments #53-57: The EA (pp. 15-16) contains a brief literature review of user conflict between hiking and mountain biking. The analysis (p.16) discloses that the potential for user conflict will undoubtedly rise with shared use. There are, however, a number of mitigating factors that should be considered when considering user conflict at Tracy Ridge. These factors are outlined in the EA (pp.16-17). As the EA points out, shared use trails are fairly commonplace across various public land ownerships, including the Forest Service. Importantly, for users that desire a hiking-only experience, the Allegheny National Forest will continue to offer over 150 miles of hiking-only trails.

Comment #58: The EA offers as a mitigating factor to user conflict, that many of the trails have a fairly wide tread and open forest environment allows good sight lines. This is true generally in the winter, but with leaf out, sections 1-4 and 4-5 will have many places with limited sight lines. In addition the tread in these areas is not fairly wide. In fact, it is fairly wide only in the sections 3-17, 12-14, 14-15, and 15-2. (Commenter #17)

Response: This comment has been reviewed by the responsible official and is noted. The statement in the EA is valid – the trail system is located in an oak-hickory forest which is characterized by an open forested environment with a limited understory.

### **Issue #3: Character and quality of trails at Tracy Ridge**

Comment #59: Goal #1 in the EA, Address maintenance needs on the Tracy Ridge Trail System, will not be achieved because there is no maintenance or re-design plan proposed. The EA simply proposes a

new environmental impact, opening trails that the Forest Service has not adequately maintained for many years, and has no plans to maintain in the foreseeable future, to a new use for which the trails were not designed. It is hard to understand how the Forest Service believes the proposed action will make the above stated current condition in any way better when they are proposing to open the trail system to a new impact with no plan for maintenance and no plan to redesign the current trail to mitigate increased impacts of the new proposed use. (Commenter #5)

Response: The project will open the trail system to bikes as this will bring in another user group to assist with trail maintenance. The Forest Service does not agree that allowing bikes on the trails will result in a “new impact.” Research does not support the contention that bikes are more impactful on trails than hikers. Current Trail Management Objectives (TMO) for the trail system include the maintenance plan for the system. Adding bikes to 12.5 miles of the system does not change this plan (referred to as “Target Task Frequency” in the TMOs).

Comment #60: The Forest Service has also not proposed a management plan or Target Frequency. This is contrary to guidance and in violation of the new law, the National Forest System Trails Stewardship Act, which the Forest Service uses to justify the proposed action.

Given that users could very likely be injured on un-maintained trails not designed for their designated use, it may be unwise for the Forest Service to invite a new use to a trail that is by Forest Service description, “not adequately maintained,” before regulations are promulgated to determine the disposition of “financial risk from claims or liability associated with volunteers undertaking trail maintenance.” (Commenter #5)

Response: The project has proposed to add bikes to the Tracy Ridge Trail System as an allowable use. The existing trail management objectives includes a maintenance schedule (i.e. target frequency). A new user group in the area will bring in much needed volunteer assistance. Furthermore, trail specifications for biking and hiking are similar. See response to comments #42-43.

Comment #61: The plan would not create a required Mountain Bike Management Area based on the most demanding use of the trails for such a massive project and has no plan for monitoring trail use and damage or enforcing violations. The Forest Service Plan is to allow mountain bikes on low impact hiking trails that are not designed and managed for mountain bikes endangering users – both hikers and bike riders. It’s simply dangerous and irresponsible. (Commenter #6)

Response: A “mountain bike management area” designation does not exist in the current Allegheny Forest Plan. There is no requirement that the Forest establish such a management area.

Comment #62: I would like to say that I am totally opposed to opening the proposed Tracy ridge Wilderness Area to mountain biking. There are quite a few reasons why this is the case. The beauty of the Tracy Ridge Area lies in the fact that it is just like a walk through a wilderness. The scenic beauty is enhanced because there are no motorized vehicles or mountain bikes to deal with. Allowing mountain bikes or e-bikes on these trails would dramatically reduce the wild feel the area offers. It would mean more trail erosion and maintenance. It would totally diminish the wild character of the Tracy Ridge Area. (Commenter #15)

Response: The Forest Service uses the Recreation Opportunity Spectrum (ROS) tool as a guide for recreation users to understand the type of recreational experience that can be expected at various sites. The Tracy Ridge trail system is not managed to a “wild” or wilderness level. The ROS for the Tracy Ridge trails is “semi-primitive non-motorized.” In this ROS category, a user may expect to encounter up to 15 parties when utilizing the trail system. Mountain biking is compatible with this ROS. Currently, usage of the system rarely reaches 15 parties on any given day, much less per trip for a

specific group.<sup>9</sup> With the shared use trail proposal, the Forest Service expects some increased usage of the trail system, but the overall use of the system will remain low – below the semi-primitive non-motorized threshold. It is anticipated that the bicyclists that utilize the system will primarily fall into two groups: local users looking for a different experience than Jakes Rocks and visitors staying in the campground. Given the limited mileage available (12.5 miles), it is not anticipated that Tracy Ridge will become a destination of its own.

Comment #63: Some may object that other areas can be used as a foot-traffic-only refuge. I have two counters to this objection, however: the same applies to mountain biking areas, and Tracy Ridge is especially well-suited (in contrast to other areas) to serving as a human refuge. As the Proposal mentions, the Jakes Rocks Trail System will soon greatly expand the trails available to mountain bikers. In contrast, relatively few areas in the ANF can serve the important function as human refuges. Don't take my word for it; take it from the ANF's own 2006 Draft Environmental Impact Statement to Accompany the Proposed Land and Resource Management Plan: "There is a mix of opportunity for solitude and serenity, self-reliance, adventure, challenging experiences, and primitive recreation...in the Tracy Ridge RA. These opportunities diminish the closer you are to the periphery near campgrounds, roads, and the Allegheny Reservoir which is often busy with boat traffic and noise ... There are few places on the Forest that offer as high quality scenery, natural integrity, and ecosystem function as the Tracy Ridge RA" (C-42). Mountain bike access would diminish these rare and important opportunities, especially since such access would be an infiltration, instead of only bleeding in on the periphery. Even more importantly and alarmingly, mountain bike access would seriously diminish the Area's rare natural integrity. It should be clear, then, why it would be mismanagement of the Tracy Ridge RA to allow mountain bike access. Mountain biking — an increasingly popular hobby that is nonetheless enjoyed by relatively few people — has other areas available and would greatly diminish the Area's rare capacity to serve as a refuge, a vital service that can be enjoyed by any able-bodied individual. (Commenter #18)

Response: This comment has been reviewed by the responsible official and is noted. The comment that bikes diminish opportunities for high quality scenery, natural integrity, and ecosystem function is subjective and unsupported by research that has looked at impacts of bike use on trails. Research does suggest that mountain bikers also cherish high quality scenery, natural integrity, and ecosystem function and seek out these values when trail riding (see response to comment #128).

### **Current trail condition and usage**

Comment #64: According to the Environmental Assessment, a counter was installed at the Morrison Trailhead in the summer of 2016. It received 1000-1250 visitors a month, this is two times greater than the than the numbers at Tracy Ridge. Also, according to the Assessment, an estimated 1500 users utilized the Jakes Rock Trailhead in October of 2016 while only 400 users were at the Tracy Ridge Trailhead. Well, there's a big reason for the difference. According to the Pennsylvania Department of Transportation, the traffic count on Hwy 59 is 1400 cars per day. Highway 59 is the highway where both the Morrison Trail and Jake's Rock are located. The traffic count for Hwy 321, the Highway that Tracy Ridge is on, is only 100 cars per day. Again, these are Pennsylvania DOT statistics. In other words, the Morrison Trail and the Trails at Jakes Rock are convenient to 1300 more cars a day than Tracy Ridge. There are 1300 more cars available to stop by and check out those trails, than at Tracy Ridge. There are 1300 more cars that stopping by Jakes Rock and doing a short ride is not going out of the way. Meanwhile, going to Tracy Ridge is going out of the way for everyone except the 100 cars a

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<sup>9</sup> Indeed, from August-October 2016, only three days exceeded 15 parties total. Note that the ROS for Tracy Ridge anticipates interaction with up to 15 parties for a particular visitor. The system is hosting far less than 15 parties for the entire day.



day. (Commenter #1)

Response: Certainly, Highway 59 is a busier highway than Highway 321 but the use numbers at the trailheads reflect the use of the trail. Tracy Ridge is a relatively lightly used trail system – particularly relative to the 34-miles of trail available. The EA (pp. 10-11) describes the use numbers at the Tracy Ridge and compares these numbers to other trailheads.

Comment #65: As in the “scoping” documentation from last summer, the EA repeatedly claims (page 2 and elsewhere) that the Tracy Ridge trail system is “underutilized” by hikers. The Tracy Ridge hiking-only trail system always has been, is now, and always will be extremely popular as a hiking and backpacking destination. There has been no decline in use by hikers, and the ANF has provided no significant data to back up their patently specious claims. There is not even the smallest kernel of validity to claims that the Tracy Ridge trail system is “underutilized” by hikers.

The claims have been fabricated because the ANF started with the assumption that they wanted to establish mountain biking at Tracy Ridge, and so backward-engineered rationale as to why that activity is suddenly “appropriate” at Tracy Ridge.

The EA cites some cursory usage data (where last summer’s Scoping documentation cited none), evidently collected during the late summer and early fall of 2016 – fully a year after the ANF predecided that mountain biking was to go forward at Tracy Ridge. This, coupled with the assertion that it is the “professional opinion” of the ANF that the hiking trails at Tracy Ridge are “underutilized” by hikers is unconvincing and wholly inadequate rationale to use to permanently establish mountain biking at Tracy Ridge. (Commenter #7)

Response: The EA (on pp. 10-11) describes the use level at Tracy Ridge. While the EA has quantified the use of the Tracy Ridge Trails and provided some sense of perspective of these numbers (relative to other trail systems), the commenter has provided no evidence that the trails are “extremely popular.”

Comment #66: The EA confirms that this project does not negatively impact the environment, or detract from the existing beauty of the area. The shared use designation will not change the trail surface, will not create extra strain on plants or wildlife, and will not create significant user conflicts. I agree that the trails are lightly used, and have good sight lines that eliminate surprise encounters. Most cyclists in my experience are courteous and want the best for the land and other trail users. (Commenter #8)

Response: This comment has been reviewed by the responsible official and is noted.

Comment #67: Disagree that connectors are under-utilized and seldom used. Myself and the many friends whom use the trails can tell you about nearly every foot of the trails and use them more often than you state (10 to 15 days per year). I do not often use the campground because I have a camp in Wetmore but have camped for up to a week. (Commenter #14)

Response: As stated elsewhere, the EA describes the use at Tracy Ridge utilizing actual data gathered in 2016. Furthermore, the EA discusses the condition of the connector trails (EA, p.2). Conditions on the ground suggest that these connectors are lightly used and use data supports these observations.

#### **Issue #4: North Country Trail**

Comment #68: The EA does not adequately recognize the status of the North Country National Scenic Trail (NCNST) and refers to the trail as the North Country Trail. (Commenter #4)

Response: Thank you for the comment. The full name of the trail system has been utilized in this

decision document.

Comment #69: The EA fails to acknowledge the significance of the reasonably foreseeable impacts to the North Country National Scenic Trail (NCNST) that will be caused by the proposed action. The EA does not recognize the fact that the NCNST is a national trail supported by a Memorandum of Understanding (MOU), FS Agreement #16- MU-11090100-036, between the North Country Trail Association, the National Park Service, and the Forest Service (hereafter the Triad Agreement). The Triad Agreement for the NCNST directs parties in the agreement to make good faith efforts to reduce uses other than hiking and backpacking on the trail. Unfortunately, the EA ignored the public scoping comments that expressed concern that it is reasonably foreseeable that an impact and effect of the proposed action will be illegal bicycle riding on the NCNST. Ignoring the reasonably foreseeable significant impact of illegal bicycle riding on the NCNST is a violation of the Triad agreement. The Forest Service acknowledges that there is some illegal riding currently on ANF trails and the NCNST. The reasonably foreseeable significant impact of illegal bicycle riding on the NCNST also makes this a major federal action requiring an Environmental Impact Statement (EIS). As indicated in the table above the NCNST is a "unique characteristic" as per the intensity factor for significance, 40 C.F.R. § 1508.27 (b) (3). The failure of Forest Service to amend the forest plan to create a separate management area for the NCNST as directed by the Triad Agreement, and instead propose an action to amend the Forest Plan to create reasonably foreseeable impacts to the NCNST undermines the Triad Agreement, and suggests a lack of intent to protect the NCNST. (Commenter #5)

Response: A MOU does not mandate a specific outcome; rather it is agreement that guides the interactions of various agencies to (in this case) manage the NCNST. This project does not violate the MOU. The project does not permit bicycling on the NCNST. Nevertheless, this decision includes additional monitoring and mitigation to further minimize the potential for bike trespass on the NCNST.

Comment #70: The EA suggests that the Forest's "limited resources" have already been spent on creating a "package of design criteria...including signage, education and close coordination with local bike clubs." (Another reason it seems to me that approval is a done deal.) It goes on to state that the portions of Tracy Ridge, Johnnycake, and Nelson Run Trails that are to serve as buffers are "steep, excessively rocky and, presumably quite undesirable for most bike users" and that this will counteract the draw of the Reservoir. Having walked to the points where these trails are closed (5, 17, and 12), I can tell you that there is no indication that it will be excessively steep. In fact, based on my reading of the topo lines on the free Tracy Ridge Hiking Trail System Map (which will need to be updated if this project goes forward), it appears the portion of the trail above Nelson Run (5-7) continues relatively gently down toward the lake as does Section 5-6. I am certain there would be a great deal of trespass on the NCT from point 5, since a rider would be aware of sections of steep uphill if he or she turns around and equally aware from the free map that the other trails continue downhill where one could use the NCNST and PA 321 to close the loop back to the trailhead. Of course, Section 4-5 and 1-4 aren't suitable in their present condition for mountain bike use, so this point may be moot if a decision is made to omit these from shared use. (Commenter #17)

Response: The NCNST has been buffered from the shared use portion of the trail system by a mile or more of trail. In this decision, the 4-5 section of the trail is authorized for bike use but will not be open to bikes unless a loop trail is built.

Comment #71: The EA fairly concludes that: "The shared use trail proposal would increase the potential for bike trespass on to the NCT," but then goes to great length to note how that can be mitigated, primarily through signage, education, etc. That might certainly keep the majority of mountain bike users from venturing beyond the permitted trail area, but certainly not all. And there is no mention of how the prohibition would actually be enforced, probably because in reality it will not be enforced. The FS does not have the staff to see that happen. With literally hundreds of days spent on

trails in the Allegheny National Forest, I have only once come upon a FS official in the backcountry and that was on the Hickory Creek Trail several years ago. Putting mountain bikers on a trail system linked to the NC Trail is certain to increase the illegal use of mountain bikes and conflicts. This needs to be more fully addressed in the EA. (Commenter #2)

Comment #72: On page 22 in Issue #4 statements are made that mountain bike trespass does not appear to be an issue in the Allegheny National Forest (ANF), anecdotal reports of bikes on prohibited trails are very few, and ANF staff have had very few bike trespass reports. Yet the EA fails to bring the reader's attention to earlier statements that "the majority of mountain bike use on the Forest occurs on the Bradford Ranger District" and "with the exception of Jakes Rocks" the trails in the Bradford Ranger District "tend to get low bike use". Low mountain bike use of trails in the ANF is the logical reason that there is very little documented evidence of mountain bikes trespassing on the NCNST. Any mountain biker that trespasses on the NCNST in the Tracy Ridge National Recreation Area is unacceptable and must not be tolerated. If one mountain biker goes beyond the Tracy Ridge trails that are proposed to be open for shared use this will inevitably lead to other violations due to word of mouth or physical evidence that a mountain bike has gone beyond the end of the shared use trail sections that lead directly down to the NCNST in the Tracy Run and Johnnycake Run areas. (Commenter #3)

Comment #73: The majority of the trails that are proposed for shared use are located along the ridge lines in Tracy Ridge. There are two trail sections that have a significant amount of slope leading down into the head waters of Johnnycake Run. The slope on these sections is very similar and in some places steeper than the slope on the trails leading down to the NCNST from the head waters of Johnnycake Run and in the area of Tracy Run. On page 18 in Issue #2 the EA states "mountain bikers prefer single track trails that emphasize natural settings, variety, flow and trail features such as slope and curve" and goes further to state that a study "reported that users preferred trail qualities that included single track, natural scenery, flow and technicality". On page 20 in Issue #2 the EA states, "Because of the fairly level slope of the area, these trails provide a unique opportunity to offer beginner/intermediate riders an experience that is different than what Jakes Rocks will offer." If the Tracy Ridge trails are opened to shared use, then it is very likely that as beginner and intermediate riders gain experience that they will seek out more variety, slope, and technicality. Without specific mechanisms to prevent trespass on the NCNST, then how will the NCNST be protected from those desiring more variety, slope, and technicality? If there is greater use of the Tracy Ridge campground as a result of opening up some of the trails for shared use, then there will be greater likelihood of violations on the NCNST because of riders staying longer in the area as well as seeking more rider challenges. The EA does not address this potential issue. (Commenter #3)

Comment #74: The NCTA ANF Chapter is disappointed to see that the five (5) specific deficiencies that we identified in the Scoping Letter and Scoping Document issued on July 15, 2016 were not specifically addressed in the EA. Those deficiencies dealt with signage, fixed barriers to prevent mountain bikes from accessing the North Country National Scenic Trail (NCNST), monitoring program by the Forest Service and mountain biking organizations, NCNST trail damage responsibility and a policy for consequences of violation of mountain bikes trying to access the NCNST. The NCTA ANF Chapter is very concerned that if specific provisions dealing with these deficiencies are not written into the plan, then if the plan is approved, it would be extremely unlikely that these issues would ever be adequately addressed. This could then result in a significant conflict between hikers and mountain bikers. (Commenter #3)

Comment #75: The EA inadequately describes the signing, education, monitoring and enforcement steps that the Forest Service plans to take to ensure that bikes trespass on the NCNST does not occur. (Commenter #4)

Comment #76: The 4 to 5 section of trail proposed to be open to bicycles which parallels Route 321 is



2.31 miles long (orange on attached map), but the only place one can go legally after reaching the end of the section of trail proposed to be open is back the way you came. This trail system is not designed for mountain biking. The only loop available at the end of this section of trail would require illegal riding on the NCNST. (Commenter #5)

Comment #77: The EA admits (page 23) that “the shared use trail proposal would increase the potential for bike trespass on to the NCT [North Country National Scenic Trail],” and that under the project “the potential remains for bikes utilizing the NCT.” The Tracy Ridge trail system, including the NCT, is interconnected. There will be perpetual mountain bike trespass on the NCT at Tracy Ridge should that activity be formally established anywhere in the area – whether it is “against the rules” to ride on the NCT or not. Whether rocks, barricades, signs, or other forms of discouragement to riding on the NCT are posted at NCT intersections or not. Some mountain bikers will continue riding beyond the three locations on the Scoping document map labelled “No Bicycles Beyond This Point” (Figure 1) – including onto the NCT. To state or imply otherwise is naïve at best. On the Johnnycake Trail in particular, the lure of riding down to the water’s edge at the Allegheny Reservoir will be too great for too many (one is too many and completely unacceptable). There’s no plan for how to address those who will cavalierly disobey such signs. It won’t be everyone, but there will be some, and where some go others will follow. It is axiomatic that it would be better for the NCT at Tracy Ridge if there was no mountain biking allowed anywhere within this area than if there is “limited” mountain biking established in parts of the area. (Commenter #7)

Comment #78: From this perspective, we would assert that the draft environmental assessment’s plan for protecting the North Country National Scenic Trail in fact relies almost exclusively on user education and the ability of the prospective mountain biking organizations the Forest Service would partner with to “police their own”. We recognize and value the knowledge, skills, dedication, and passion that exist with the mountain biking community, and feel there is great potential for these groups to be excellent partners and trail stewards.

The Forest Service must provide a plan and procedure for Forest Service staff to regularly monitor the North Country Trail to identify any increased occurrence of unsanctioned mountain bike use, as well as any trail degradation or resource damage that would be attributed to mountain bikes.

The Forest Service must provide a plan for routine compliance patrols within the Tracy Ridge area for at least two years after any change to the allowed uses is implemented. Compliance patrols shall be for the purpose of monitoring use and user interactions, providing information and education regarding allowed uses, and enforcing regulations.

The final plan must include the installation of physical obstacles in addition to signage at access points where mountain bike and hiking-only trails intersect. The obstacles will be designed to require tight 90-degree turns to negotiate, so that a mountain bike cannot be ridden beyond that point without stopping, dismounting, and lifting the bike over the obstacle.

The final plan must include an alternative to the currently proposed dead-end mountain bike segment of the southern leg of the Tracy Ridge Trail. (Commenter #12)

Comment #79: The EA states that the Proposal was 'carefully crafted to keep bikes off of the hiking-only North Country Trail', but, realistically, looking at the map, is a bike rider really going to ride 2 miles down the south leg of the Tracy Ridge Trail, coming to a supposed deadend trail junction and then turn around? That is highly unlikely. Experience tells us that there will be a percentage of riders who will ignore any signage or 'education' in pursuit of the adrenalin thrill. For this same reason, some percentage of mountain bikers will not "stay on the trail corridor because it is the easiest path to travel" as the EA says it 'expects'. They will, in fact, do the opposite, and go off trail for exactly that reason.

The EA also claims that the 'area will be monitored for compliance', no doubt with the same lack of resources that were used to maintain the trails to begin with. We believe that this Proposal will not only 'increase the potential for bike trespass on the North Country Trail' but actually facilitate it, putting at unnecessary risk a section of the NCT that is 'highly valued' by the hiking community. (Commenter #16)

Comment # 80: [I]mpacting the North Country National Scenic Trail (NCNST). Your plan only includes vague statements about how mountain bikers probably won't ride down to the NCNST because the terrain will discourage them. But in other places, you say that mountain bikers like challenges. Furthermore, there are no specific details about efforts to educate bikers about the NCNST. No details about signage locations and content and no mention of some type of buffer, like gates, to physically block bikers from continuing their ride past trails open to them. Nowhere in the EA was the issue of monitoring trail use, methods of reporting impacts of illegal mountain bike and procedures for enforcement addressed. (Commenter #20)

Response to comments #71-80: The EA discloses (p. 23) that the potential for bike trespass on the North Country Trail increases with this proposal. However, the decision for this project includes a robust suite of mitigation and monitoring to minimize bike trespass on the NCNST. The Forest Service will monitor the area for NCNST trespass. In the event that undesirable conditions arise, several options are available to reverse this decision. This includes supplementing the EA and issuing a new decision, initiating a new planning process or signing an emergency closure order.

Comment #81: The Allegheny Forest Service's Plan to open Tracy Ridge's hiking trails to mountain biking is ludicrous on its face in its blatant attempt to reward years of illegal, mountain bike riding on the National Scenic North Country Trail at Tracy Ridge. (Commenter #6)

Comment #82: The plan would create a magical thinking expectation that somehow unmonitored mountain bike riding proposed in the plan on trails not constructed and managed for mountain bike use will prevent damage and cause illegal mountain bike riding on the National Scenic North Country Trail to magically cease even after the Forest Service ignored the illegal violations for years. (Commenter #6)

Response to comments #81 and 82: As the EA states (p. 22), current bike use of the NCNST is low. No evidence was provided during the comment period that invalidates the findings in the EA. Over the last nine months, the Forest Service has monitored bike trespass on the NCNST (with the help of the ANF Chapter – NCNST). Statements in the EA are accurate – bike use of the NCNST is rare. It is unclear as to why the Allegheny Defense Project (ADP) feels that bike use of the NCNST is widespread and ignored by the agency. The Forest respectfully requests any information that ADP may have that substantiates their comments.

Comment #83: The EA claims (page 32) that "there is no known problem of illegal mountain bike trespass on the Allegheny National Forest." In fact, one cannot hike the NCT in the proposed Minister Valley Wilderness Area, for example, without either encountering mountain bikers trespassing on the trail, or their tracks and ruts in the trail from recent trespass:

[https://www.youtube.com/watch?v=\\_Vs9ZTgDzZ8](https://www.youtube.com/watch?v=_Vs9ZTgDzZ8). (Commenter #7)

Response: The video link provided is seven years old. Forest staff routinely hike the Minister Creek Trail and have not encountered bikes on the trail or evidence of recent bike use.

Comment #84: To further refute the "no known instances of trespass" consider the following, highlighting mine, that I found posted at this address: [http://trails.mtbr.com/cat/united-states-trails/trails-pennsylvania/trail/allegheny-national-forest/prd\\_169901\\_4573crx.aspx](http://trails.mtbr.com/cat/united-states-trails/trails-pennsylvania/trail/allegheny-national-forest/prd_169901_4573crx.aspx) (Commenter #17)

Response: As discussed elsewhere in this response to comment, there are infrequent reports of bike use on trails closed to that use, but the occurrences are quite rare. The link above is for a mountain bike comment forum – the most recent comment was from 2013. Some comments reference riding options at Minister Creek and other areas of the Forest closed to bike use. The comments were made more than 15 years ago, before the areas were closed to bikes.

#### **Issue #5 Wilderness Designation at Tracy Ridge**

Comment #85: Also, we are talking about a very small section of land that mountain bikers are being excluded from. Tracy Ridge is 9705 acres. In the lower 48 States, Wilderness Areas are only around 2.7% of the land area. Currently, the State of Pennsylvania has 9005 acres of Federally Designated Wilderness. That 9005 acres represents .03% of the land area of the State of Pennsylvania. That's right, 3 hundredths of 1 percent of Pennsylvania is Wilderness. Pennsylvania ranks low on the list of percentage of land used as Wilderness Areas. Even if all the Wilderness Areas that the Friends of the Allegheny Wilderness are proposing are approved by Congress, that still is .2% of the land area of Pennsylvania. That's right, it's only about 1/5th of 1 percent of the land area. (Commenter #1)

Response: Wilderness designation is determined by the U.S. Congress. The EA discusses this topic on pages 23-24 and 34-35.

Comment #86: Opening Tracy Ridge to bikes will moot the ability of Congress to designate the area as wilderness. Because of the higher density of trails in Tracy Ridge relative to the Boulder/White Cloud area, the comparison of the two areas is erroneous. (Commenter #1)

Comment #87: Under "Alternative 2 Proposed Action" it reads, "Although brought up by commenters, it is not clear how shared use trails in the Tracy Ridge area would disqualify the area for wilderness designation." The key part of that sentence is the part where it says "it is not clear." Sounds like the Forest Service doesn't know for sure. They go on to mention to say "There is no evidence that bike use of the area would degrade the trails at all and certainly to the point in which wilderness designation would be improbable."

Well, I have BIG NEWS for the Forest Service. The degrading of the trails is not the issue when it comes to the mountain bikes in the Wilderness. The issue is that mountain bikers are now the most vocal opponents of any Wilderness Designation. It's hard enough to get any Wilderness Area passed by Congress without having vocal opponents. Just google "mountain biking, wilderness" and you will find dozens of articles on this subject. (Commenter #1)

Comment #88: The plan will permanently destroy proposed Wilderness status for Tracy Ridge. Tracy Ridge qualifies for Wilderness designation by the Forest Service's own standards and has been continuously proposed by the public for Wilderness designation since the 1970's. (Commenter #6)

Comment #89: The ANF claims that is it "not clear" how allowing mountain bikes on the hiking-only trails at Tracy Ridge would jeopardize its potential consideration for a wilderness designation under the Wilderness Act of 1964. It is quite clear – mountain bikes are prohibited in wilderness areas. Under the Wilderness Act, mechanized transport is not permitted within Wilderness areas. 16 U.S.C. § 1133(c). While bicycles are not mentioned by name in the Act itself, the Act separates "motorized" and "mechanized" transport, indicating Congress's intent that the prohibition extend beyond merely motor vehicles like cars, all terrain vehicles, and snowmobiles. Acting on this reasoned interpretation of the language in the Act, the Forest Service has also explicitly excluded bicycles in its own Forest Service Manual. Under Chapter 2320 – Wilderness Management, the Forest Service defines "mechanized transport" as "any contrivance for moving people or material in or over land, water, or air, having

moving parts, that provides a mechanical advantage to the uses that is powered by a living or nonliving power source, including...bicycles....” (Commenter #7)

Comment #90: To allow mountain biking on the hiking trails of the proposed Tracy Ridge Wilderness Area could be an irreversible permission for mechanized and motorized use that would moot the potential for future wilderness designation. This would be a shame for all Pennsylvanians, since the ANF contains the only federal public lands that presently qualify as wilderness under the Wilderness Act (although there may be some potential for a small wilderness area designation or two under the Wilderness Act on Erie National Wildlife Refuge lands – but nothing that approaches the size and majestic wildness of Tracy Ridge). Failure to properly protect the wilderness character of the Tracy Ridge area and instead to proceed with the Project will pre-empt the prerogatives of Congress should members of the Pennsylvania Congressional delegation determine that public support warrants introduction and consideration of wilderness preservation legislation as the most appropriate long-term protection for the abundant natural values and quiet, non-mechanized, non-motorized recreational enjoyment of the area. (Commenter #7)

Comment #91: Furthermore this would mean that the Tracy Ridge Area could not be an official (congressionally designated) wilderness area. Compared to other National Forest's the ANF has so little precious wilderness it seems to be obvious that Tracy Ridge has to be protected from mountain bike use and keep alive the wilderness that so lacks in the ANF and PA in general. (Commenter #15)

Response to comments #86-91: The EA (p. 24) states that the presence of mountain bikes on trails does not seem to dissuade Congress from designating wilderness. Boulder/White Clouds was provided as an example of a recent wilderness designation that occurred despite the presence of mountain biking on trails within the wilderness. One commenter provided a trail to acreage ratio and suggested that Tracy Ridge and the Boulder-White Cloud areas are not comparable. The relevance of the trail to acreage ratio to the main point of Congressional action is not clear. To date, no evidence has been provided to the Forest Service that shows the presence of mountain bikes stymies efforts to designate an area as wilderness.

Comment #92: Further, the addition of bicycle use to the Tracy Ridge National Recreation Area will serve as a practical impediment to this area being considered for a wilderness designation in a future Forest Plan Amendment. (Commenter #5)

Response: Only Congress can designate an area as wilderness. The Forest Service, however, can designate – through a forest plan-level planning process – an area as a wilderness study area. Allowing bikes on Tracy Ridge Trails does not limit the ability for the Forest Service to designate the area as a wilderness study area in a future forest plan. In 2007, for example, the Minister Creek Wilderness Study Area was established in the Forest Plan. At that time, bikes were allowed on the Minister Creek Trail System. Once the area was designated as a wilderness study area, bikes were prohibited on the trails.

Comment #93: Furthermore, substantially noticeable human imprint resulting from previous off-road vehicle trail use has, in fact, been cited as a reason to deny wilderness designation under the Wilderness Act. (Commenter #7)

Response: The court case referenced in this comment is related to motor vehicle use in the Big Cypress National Preserve. It does not appear to be relevant to the activities considered in this project. As referenced throughout the EA and this decision document, research shows that bike use on trails is no more impactful to trail resources than the current hiking use.

Comment #94: The Bradford District Ranger knows very well that implementation of the Project

would enormously complicate our ability to have Tracy Ridge designated as wilderness. He further knows that he himself would be an outspoken opponent of wilderness designation for Tracy Ridge, and would use every shifty bureaucratic agency trick in the book to help prevent that from happening, specifically to retain mountain bike use in that area once it has been established.

Response: This comment has been reviewed by the responsible official and is noted.

#### **Issue #6 Wildlife, Native Plants and nonnative invasive plants**

Comment #95: There is no mention of impacts to bears in the EA. According to Wildlife Biologist Brian Horejsi ‘The basic science solidly supports the general claim that bikers and bikes are displacing bears,...’ Since the proposed trails for mountain biking are in the middle of the proposed Tracy Ridge Wilderness, it will effectively cut the range for bears in half. The article about mountain biking displacing bears which quotes Brian Horejsi is located here:  
<http://www.thewildlifeneews.com/2014/08/05/mountain-biking-impacts-on-bears-and-other-wildlife-by-brian-horejsi/> (Commenter #1)

Response: The link provided is a blog post with no reference to peer-reviewed studies concerning bears and mountain bikes. The EA discloses that bike use on the trail could temporarily flush wildlife adjacent to the trail (EA, p. 25). The project proposes to add bikes to an existing trail system – evidence was not provided that would suggest that this new use would have a deleterious impact on the black bear population at Tracy Ridge. Indeed, the Pennsylvania black bear population appears to be quite robust. See recent article detailing the growth of the black bear population:  
[http://lancasteronline.com/news/local/black-bear-population-up-five-fold-in-pennsylvania-since-s/article\\_c5d28a22-4eb6-11e6-8867-67d8eb7026e5.html](http://lancasteronline.com/news/local/black-bear-population-up-five-fold-in-pennsylvania-since-s/article_c5d28a22-4eb6-11e6-8867-67d8eb7026e5.html)

Comment #96: The Forest Service lack of a plan to protect wildlife from an “unnecessary mountain bike plan” consists of the unscientific conclusions “is expected to be” and “more than expected” and “we will deal with it after it happens.” The wildlife analysis is inadequate and does not analyze the direct, indirect and cumulative impacts from the hidden scale of the project. (Commenter #6)

Response: According to the analysis and the published research on mountain bike use, adverse wildlife impacts are not expected. The commenter did not provide more specific comments on this proposal and did not provide an explanation of the statement referencing the “hidden scale” of the project.

Comment #97: The Biological Assessment (BA) that was prepared for the EA is wholly inadequate to ascertain the effects to threatened, endangered, sensitive, and all other species of concern. It is obvious that no in-depth analysis was performed, and that standard boxes such as “no impact” and “no suitable habitat,” etc. were simply rotely ticked off and the BA rubber-stamped for the purpose of helping to get the Project approved. This cursory BA was obviously just a simplistic protocol to help justify the premade decision to approve the Project. This is further evidenced by the stark contrast between the EA prepared for the Jake’s Rocks Project submitted by the ANF in 2014, which included a Biological Assessment, Biological Evaluation, and a Wildlife Report, which collectively span over 60 pages, compared to the eight-page BA prepared for the Tracy Ridge Project. (Commenter #7)

Response: The Jakes Rocks BA included more than 45 miles of new trail construction. The Tracy Ridge Project allows bikes on 12.5 miles of existing trails. The commenter did not provide any research or additional information that challenged specific portions of the BA.

Comment #98: The BA also should have been included in the documentation that went out to the full public, automatically accompanying the EA and the EA cover letter, as they were when the ANF released the EA for the Jake’s Rocks Project. Members of the public should not have had to make a



special request to acquire the BA. The reason the ANF did not do this is because they are aware of the stark inadequacy of the BA, and so wanted to minimize its visibility to the public because they are aware of this acute vulnerability to their predecided Project. (Commenter #7)

Response: This comment has been reviewed by the responsible official and is noted. The BA was provided to the commenter, upon request in January 2016. No other requests for the BA was received.

Comment #99: Another important impact that was essentially overlooked by the ANF in the EA is the potential for invasive species proliferation. Bikes have potential to operate as significant seed vectors. Over 505 species of seeds can be transported over long distances on vehicles, only to be deposited in new and foreign ecosystems. It is the ANF's stated purpose with this Project to make the ANF a destination for mountain bikers. This could draw mountain bikers from across the country who will bring their bikes and ride the trails in Tracy Ridge. With no way to monitor whether or not bikers have properly washed their bikes and removed any residual seeds from a previous ride elsewhere, the Tracy Ridge area will be susceptible to the unwitting transfer of invasive species and/or extensive weed growth deep into the interior of the proposed Tracy Ridge Wilderness Area. However, on page 25 of the EA, in the "Alternative 2- Proposed Action: Native Plants and Non-Native Invasive Plants," brief mention is made of invasive species potentially increasing due to increased use and that the situation "will be treated accordingly." Due to the Proposal's heavy reliance on the rationale that Forest Service budgets are already too thinly spread to focus on trail maintenance at Tracy Ridge (page 3 of the EA), it logically and unavoidably follows that adding the expense of invasive weed management on top that burden should itself be enough to disqualify the Proposal from proceeding further. (Commenter #7)

Comment #100: On page 25, in the "Alternative 2- Proposed Action: Native Plants and Non-Native Invasive Plants," mention is made of invasive species potentially increasing due to increased use and that the situation "will be treated accordingly." Due to the proposal's heavy reliance on the fact that Forest Service Budgets are already too thinly spread to focus on maintenance issues at Tracy Ridge, adding invasive weed management on to that burden should itself be enough to disqualify this proposal from proceeding further. (Commenter #13)

Response to comments #99 and 100: The EA (pp. 24-25) adequately discusses the potential for weed spread with the shared use trail proposal. Weeds have many potential vectors, including hiking use. Allowing bike use on the 12.5 miles of the trail system does not represent a significant increase in the risk of weed infestation in the project area.

#### **Issue #7 Soil productivity and water quality**

Comment #101: The plan will unleash unmonitored mountain bike riding on fragile, wet soil, hiking trails on Tracy Ridge. (Commenter #6)

Response: The commenter did not provide any evidence that supports the statement concerning "fragile, wet soil[s]." Indeed, according to the EA and documentation from when the trails were built in the 1990s, the system is generally located on a plateau with "well-drained soils" (EA, p. 27).

Comment #102: You may notice references to a V-shaped tread above. The EA dismisses this concern in footnote 19 on page 22 saying "Trails on ANF that allow bikes show no evidence of this trail deterioration" while elsewhere stating that bike usage of these same trails is very low. This is but one of many inconsistencies within the EA. The topic is taken up again in the response to comment. Some of the comments to my informal Whiteblaze survey discuss this issue. Even the comments from people self-identifying as mountain bikers admit that trails must be properly designed in order for mountain bike impacts to be limited. None of the Tracy Ridge trails were designed for mountain bike use. Statements and the debunked research cited to the contrary notwithstanding, bicycle use on any of the



trails I identified in my survey as unsuitable for mountain bike use will prove the statements in the May 1994 decision memo to be true. (Commenter #17)

Response: All user groups impact trails in some fashion. Published research does not support statements that suggest that bikes are more impactful to trail resources than hikers. Hikers and bicyclists impact trails differently but the research shows that in terms of quantifiable impact (soil erosion, soil compaction etc...), bicycling on trails is not more impactful than hiking on trails. The notion that trails have to be designed specifically for bikes does not line up with the reality of shared use trails and trail management across the country. Increasingly, “bike-optimized” trails are being built – these are trails that are designed with bikes in mind. These trails incorporate the features and design elements (e.g. bermed turns, “table-tops” etc...) that mountain bikers find enjoyable. This recent trend, though, does not change the fact that thousands of miles of trail across the country are managed as shared use. The vast majority of these trails were not built for bikes or to the exact specifications for bike trails. Nevertheless, these trails are enjoyed safely and sustainably by the various user groups that utilize them.

Comment # 103: The person who creates the most erosion and the most impact to the trails are the trail's original designers not the user groups. Mountain bicyclists have learned to design trails in a sustainable manner, which resists the forces of erosion and use. There are no current scientific studies that show mountain bicycles cause more erosion than any other user group. The majority of the studies show that hiking and mountain biking have the same impact. I have been a coordinator of trail maintenance for the ANF Chapter of the NCTA for the last 4 years. I am very concerned at the lack of detail in all of the areas I mentioned. At this time the ANF gains great benefit from all the volunteer hours put in by our NCTA ANF Chapter to maintain not only the NCNST in Tracy Ridge, but for over 80 miles south of there. What incentive do we have to continue volunteering to work in the ANF if our hard work is destroyed by uneducated, insensitive mountain bikers that are encouraged to continue destroying trail by a Forest Service that turns a blind eye to their illegal activities? (Commenter #22)

Response: This comment has been reviewed by the responsible official and is noted.

### **Cumulative effects**

Comment #104: The Jakes Rocks' Mountain Bike Trail and the Tracy Ridge Shared Use Trails and Plan Amendment Project are connected, cumulative actions. The Forest Service failed to consider the direct, indirect and cumulative effects of the Jakes Rocks' Mountain Bike Trail Project and other past, present, and reasonably foreseeable future actions, including connecting Jakes Rocks to all of Western New York though the proposed Tracy Ridge Wilderness area under a “so-called” diminutive, simple, shared use, trail proposal. [This will] create a massive mountain bike recreation area in the Northeast U.S. from western New York to the new Jakes Rocks' Mountain Bike Trail on the Allegheny National Forest. (Commenter #6:)

Comment #105: The Allegheny Forest Service wants to create a massive, ipso facto, mountain bike recreation area in the Northeast U.S. stretching all the way from western New York which will funnel mountain bike use from the resort of Ellicottville NY, Alleghany State Park NY, across the proposed Tracy Ridge Wilderness area, all the way to the new Jakes Rocks' Mountain Bike Trail without conducting an EIS, under the guise of a simple shared use, trail proposal for Tracy Ridge hiking trails while rendering a finding of no significant impact from its inadequate EA. (Commenter #6)

Response: The Forest Service is required to consider the cumulative effects of an action. Cumulative effects is defined by the Council on Environmental Quality as “the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non- Federal) or person undertakes

such other actions” (40 CFR 1508.7). Typically, a cumulative effects analysis sets the boundaries of expected impacts and the resources that may be impacted. There should, too, be some tie between the past, present, and reasonably foreseeable activities and the proposed action. In this case, the EA (p. 28) acknowledges the impact that Jakes Rocks may have on use at Tracy Ridge.

The Forest Service is not looking to “create a massive, ipso facto, mountain bike recreation area in the Northeast U.S. stretching all the way from western NY ... to the new Jakes Rocks Mountain Bike Trail.” The current proposal proposes shared use on 12.5 miles of a 34-mile trail system at Tracy Ridge. The proposal has no connection – geographic or otherwise – to trails in Allegany State Park<sup>10</sup> or Ellicottville. These areas are not connected by trail. Tracy Ridge is nearly 40 minutes of highway driving to Allegany State Park and about an hour of highway driving to Ellicottville. Similarly, Jakes Rocks is nearly an hour from Tracy Ridge. Furthermore, while it may be expected that users in Ellicottville or Jakes Rocks may utilize shared use trails at Tracy Ridge, the proximity of these areas to Tracy Ridge is not expected to change the effects disclosed in the EA. The agency anticipates that the primary users of the trails at Tracy Ridge for mountain biking will be campers at the campground and local mountain bikers that are looking for a trail experience different than Jakes Rocks.

Comment #106: What makes the simplistic proposed solution problematic is that it's reasonable to expect that the use of Jakes Rocks will continue to increase drawing riders from Cleveland, Pittsburgh, Rochester, Syracuse, and other locations far away from the territory of "local bike clubs". Of course, some of these will be experienced riders who have learned to respect rules as they are urged by the IMBA. Others will be casual riders renting bikes from a shop in Warren or Bradford and won't have internalized this ethic. I expect the local bike shops will explain the rules of the road, but a quick explanation tends to go in one ear and out the other. After exhausting the offerings of Jakes Rocks, one could expect they'll do some Tracy Ridge riding, especially if they need a campsite (since other than Tracy Ridge, many of the campgrounds with nicer amenities are fully booked on summer weekend). As Warren and Bradford organizations promote Jakes Rocks as a way to bring tourist business to the area, more people will be coming from distances for a weekend of riding especially when/if it is expanded to the full 45 miles. As these folks exhaust the riding at Jakes Rocks, they'll look to Tracy Ridge for some variety. A small number of these riders are bound to be "jerks" or "downhillers" and they'll surely ride on down to the Reservoir and trespass on the NCNST. It will be nice that a Bike Ambassador talks to folks at the trailhead, but what will eventually be required is a law enforcement officer issuing a summons to set an example that word of mouth will spread. I presume law enforcement officers, like every other resource, are also in short supply. (Commenter #17)

Response: The EA acknowledges that increased mountain bike use at Jakes Rocks may push more use into Tracy Ridge.<sup>11</sup> However, impacts to resources – beyond what is disclosed in the EA – is not expected. The mitigation package that is included as part of this decision will help guide out-of-town riders to the appropriate use of shared use trails.

## Draft Finding on No Significant Impact

During the comment period, some commenters suggested that the EA was insufficient and that an EIS should be prepared. Some of the comments pointed to specific conditions that limit the Finding of No Significant Impact (FONSI). Many of these comments were addressed elsewhere in the response to comment. These comments will be noted with a reference to the comment number in which the

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<sup>10</sup> Currently, Allegany State Park has fairly limited mountain bike opportunities. Most trails that allow bikes are ski trails. Ellicottville is a popular mountain bike area for western NY/NW PA.

<sup>11</sup> It should be noted that in the first months of Jakes Rocks, increased bike use of other trails on the Allegheny National Forest – e.g. Morrison and Tanbark – was not detected.

response was provided. Other comments will be addressed in this section.

Comment #107: The Finding of No Significant Impact (FONSI) for the proposed action is deeply flawed. Certainly, a full Environmental Impact Statement (EIS) must be prepared for an action that requires significant changes to management documents, including in the proposed action, a change to Trail Management Objectives (TMOs), an Amendment to the ANF Forest Plan, and the rescinding of a Forest Order which prohibits the primary purpose of the proposed action. The proposed action meets the definition of Significance in Context and Intensity in 40 C.F.R. § 1508.27 (a) and (b) (1 to 4, 6 to 8) and a full Environmental Impact Statement (EIS) must be prepared for the proposed action. The proposed action is significant and will have a significant impact not only on the site specific level but also on a national level given the reasonably foreseeable impact on the NCNST. (Commenter #5)

Response: As described in the EA, CEQ regulations require an evaluation of the effects of the project relative to the established definition of significance. The context of the proposal and effects are quite limited and is adequately described in the EA on page 38. Similarly, the intensity of the effects are discussed on pages 38-40 of the EA. Based on the effects disclosed in the EA (pp.10-29) and the draft FONSI (pp. 38-40), the preparation of an Environmental Impact Statement (EIS) is not warranted. Specific to the comment above, the need to amend the Forest Plan, rescind a Forest Order and change a Trail Management Objective does not trigger the need to prepare an EIS. The EA analysis clearly shows that the impacts arising from the proposed action fall far short of a significant impact.

Comment #108: The FS describes the beneficial effects of the action but fails to recognize the adverse effects of the action that will result from opening an under-maintained trail to a new use without a redesign for the use or a management plan in place to mitigate impacts from erosion and hiker/biker user conflict. This meets the intensity factor for significance in 40 C.F.R. § 1508.27 (b) (1). (Commenter #5)

Comment #109: The proposed action is significant because the Forest Service is proposing an action that will necessitate the creation of a redesign plan and a maintenance plan, but those plans are not part of this action. This is segmentation and meets the intensity factor for significance in 40 C.F.R. § 1508.27 (b) (7). (Commenter #5)

Response to comments #108 and 109: A redesign of the trail system is not necessary for this shared use proposal. See response to comment #43.

Comment #110: The FS fails to acknowledge safety hazards inherent in this type of mixed use recreation especially on single track downhill trails like the 0.64 or 0.74 mile sections of the Johnnycake loop. This meets the intensity factor for significance in 40 C.F.R. § 1508.27 (b) (2). (Commenter #5)

Response: The EA (pp. 15-17) addresses safety and user conflict issues and responds to similar comments in responses to comments #53-58. Shared use trails are quite common across the country. On the Allegheny National Forest, several trails are currently shared use and user conflicts/safety issues are non-existent. Furthermore, the EA points to several factors (pp. 16-17) that should further minimize the potential for undesirable hiker/biker interaction at Tracy Ridge.

Comment #111: The effects of illegal riding on the NCNST (which is highly likely given the current configuration of the proposed action) will be highly controversial in the hiking and bicycling user groups and between federal agencies including the National Park Service which administers the NCNST and the Forest Service. This meets the intensity factor for significance in 40 C.F.R. § 1508.27 (b) (4). (Commenter #5)

Response: Based on current bike trespass occurrences and the mitigations included in this decision, the Forest Service does not agree that illegal riding on the NCNST is “highly likely.” The current configuration of the trail system allows for logical loop bike riding that should minimize trespass on the NCNST. The EA acknowledges the potential for bike trespass on the NCNST (p. 23) and discusses factors that may mitigate this potential. This issue is also addressed in the response to comment #68-84.

Comment #112: The proposed action amends three Forest Service Planning Documents which will affect future planning decisions without any consideration of the cumulative impacts of the decision. This meets the intensity factor for significance in 40 C.F.R. § 1508.27 (b) (6). (Commenter #5)

Response: The commenter does not offer any sense as to what cumulative effects may result from a site-specific forest plan amendment and the removal of a Forest Order. The EA (p. 39) discusses that the amendment is site-specific and only applies to a subset of the trails within the Tracy Ridge Trail System. Similarly, the Forest Order does not affect other trail systems or portions of the Forest. This decision does not establish a precedent for future actions.

Comment #113: The proposed action takes place in an area important to the Seneca Nation of Indians, but there is no evidence in the EA of FS consultation with the SNI. This meets the intensity factor for significance in 40 C.F.R. § 1508.27 (b) (8). (Commenter #5)

Response: Tribal consultation was conducted in 2016. No issues or concerns were raised for this action by Tribes. This consultation is discussed in the Decision Notice on page 6.

Comment #114: The question of mountain biking at Tracy Ridge has already been decided. In 1993, ANF personnel embarked on a major trail analysis for Tracy Ridge to determine which trails could be upgraded, and, importantly, it was also asked whether mountain biking should be allowed in the area. During the subsequent public comment period, essentially everyone who wrote in supported the ANF’s efforts to maintain the Tracy Ridge hiking-only trail system – including the NCT – for hiking use only. All of the major hiking groups opposed mountain bike use in the area. The ANF agreed with the abundant public comment that they received on this project, and ruled mountain biking on the Tracy Ridge hiking-only trails untenable.

ANF Bradford District Ranger Stanley Kobielsky wrote in his June 10, 1994 decision notice (linked to above and incorporated in to this comment letter in full by reference) that the “soils and topographic conditions of the area will not support equestrian and mountain bike use...the channeling effects of tire tracks would create additional erosion problems. These effects could be mitigated but not without extensive shoring up of our sideslopes and hardening of the tread with additional surfacing material. These actions would be expensive, are likely to change the character of certain trail segments, and would add additional maintenance costs to the system. I also believe that adding...mountain bike use to the existing trail system would increase the number of user contacts, which in turn, would adversely effect the Recreation Opportunity Spectrum, (ROS), class of semi-primitive non-motorized, (SPNM). Such changes would not be acceptable. Based on these factors, equestrian and mountain bike use will be prohibited on designated trails within...Tracy Ridge.”

As was well-documented in 1994, mountain biking at Tracy Ridge was unacceptable then, and the same is true today. Nothing has changed in that regard. To suddenly suggest anything differently is arbitrary and capricious. Certainly, the above dictates that at the very least a full EIS must be prepared for the Project. (Commenter #7)

Response: The EA’s response to scoping comments addressed this issue (pp. 33-34 – response to comment #9).

Comment #115: The EA (page 39) in responding to the law's requirement that these factors be considered, states with characteristic apathy that the proposal will not "impact any historical/cultural resources, parklands, farmland, wetlands, wild and scenic rivers, or ecologically critical areas." This statement is not only incorrect, but represents a misunderstanding of the requirement under the Forest Service regulations, which require the ANF to consider the unique character of the land impacted by the proposal, not just whether or not it is in proximity to one of the listed features. (Commenter #7)

Response: The EA contains an effects analysis (pp. 14-29) that considers the environmental effects of the proposed action. The analysis is organized around seven issues that were raised during scoping.

Comment #116: To begin with, it is clear that Tracy Ridge is unique in its wilderness character, not only in the context of the ANF, but in the context of the entire United States. Only two percent of the continental U.S. land base is protected as wilderness under the Wilderness Act, making land with the roadless, primitive character of Tracy Ridge incredibly unique. Federal Courts have held impact statements to be inadequate where they have failed to recognize the unique character of pristine wilderness in evaluating environmental impacts. Also, Tracy Ridge is located approximately 10 miles up-river from a portion of the Allegheny River classified as a Wild and Scenic River. Tracy Run, a stream located within the Project area, feeds directly into Allegheny River north of the Wild and Scenic segment. The EA makes no mention of any potential impacts this may or may not have, presumably because the ANF does not know and has not investigated this possibility. (Commenter #7)

Response: The EA contains a Wilderness-related discussion on pages 23-25 and is addressed in the response to scoping comments on p. 34-35 (comments 10-11). The Wild and Scenic River portion of the Allegheny River is separated from the project area by a dam and a very large reservoir. There is no connection between the proposed project and impacts to the Wild and Scenic portions of the Allegheny River.

Comment #117: Both the National Park Service and the North Country Trail Association have adopted policies encouraging local managers to prohibit bicycling except when the NCT is: (1) specifically designed for wheeled vehicles, (2) where the bikes would not damage part of the NCT route, (3) where bicycles could be physically restricted to the designated section, and (4) where bicycle use would not adversely affect the recreational experience of hikers. These conditions generally are not found on the typical, single-track, forested and rural segments of the NCT. Since the NCT now approaches being a sacred cultural resource beloved by thousands on par with the legendary Appalachian Trail to most hikers of this area, it is both an historical and cultural resource similar to National Wild and Scenic Rivers. There is no signage that will discourage exuberant mountain bikers from the enthusiastically exploring the trails beyond the point where they are supposed to turn around. Encouraging bicycle access to the area that the ANF itself acknowledges in the EA will impact the NCT challenges the FONSI with regard to cultural and historical resources. (Commenter #7)

Response: The EA describes the effect of the shared use trail project on the NCNST (EA, pp. 22-24). Currently, there is infrequent bike use of the NCNST in this area. The Project is not expected to increase bike use of the NCNST – particularly with the mitigation and monitoring included in this decision. In the event that bike use increases on the NCNST, there are a number of options available to revoke the authorization to allow bikes on 12.5 miles of the 34-mile trail system.

Comment #118: With the advent and exploding growth in popularity of motorized mountain bikes, this even further eliminates the possibility of allowing mountain biking on the non-motorized Tracy Ridge trails (and therefore trespass on the NCT). Because it is nearly impossible to distinguish stealth motorized mountain bikes from traditional mountain bikes, allowing any mountain biking at all is tantamount to allowing motorcycles and four-wheelers on the Tracy Ridge trails – motorized is motorized. The skyrocketing growth in use of motorized mountain bikes and their inevitable use on the



hiking-only trails at Tracy Ridge cannot be ignored when performing an EIS for the Project. The EA acknowledges (page 35) that in the eyes of the Forest Service “e-bikes are considered a motorized vehicle, and, therefore, prohibited on non-motorized trails.” Forest Service documentation proves that it is impossible for Forest Service law enforcement officials to distinguish regular human powered mountain bikes from increasingly popular motorized e-bikes without closely inspecting each machine. Therefore, it necessarily follows that all mountain bikes must be prohibited from all non-motorized trails in the ANF. This means not only the entire hiking trail system at Tracy Ridge, but all other non-motorized trails in the ANF as well. But the ANF arbitrarily asserts that such a prohibition would “not tenable or realistic.”

Response: This comment was addressed in the response to scoping comments, EA page 35 (comment #16). The commenter has provided no evidence that e-bike use is currently occurring on non-motorized trail on the Allegheny National Forest. Furthermore, it is quite simple to distinguish e-bikes from mechanized bikes – e-bikes contain a motor that is attached to the frame and is quite visible.

Comment: #119: The ANF claimed in their FONSI statement that there is no “scientific controversy” associated with the Project to warrant consideration. This term “scientific controversy” is not a legal term of art, and was likely an attempt to dissuade commenters from arguing that the Project is, in fact, controversial. The legal standard for controversial in terms of NEPA requirements is “a substantial dispute” as to “the size, nature, or effect” of the action. As articulated in detail above, there is a substantial dispute about how the Project will affect Tracy Ridge due to conflicting data on the effects of mountain biking and a complete lack of any data related specifically to mountain biking at Tracy Ridge. There is also a dispute, discussed below, as to whether or not allowing mountain bikes would permanently prohibit a wilderness designation for the area in the future. (Commenter #7)

Response: As discussed in the Draft FONSI (EA, pp. 39-40), Intensity Factor #4 is focused on true scientific controversy associated with a proposed action. Effects around bike use of trails or shared use trails are does not rise to the level of scientific controversy covered under this intensity factor. During the comment period, the commenter did not provide “conflicting data on the effects of mountain biking.” The research is mostly settled – while hiking and mountain biking may result in different types of impacts – mountain biking does not result in more severe or significant resource-related impacts.

Comment #120: The ANF ignored its own rules regarding compliance with NEPA, codified under 36 C.F.R. § 220.5. Section 220.5(a) lists classes of Forest Service activities normally requiring an EIS, and includes “proposals that would substantially alter the undeveloped character of a roadless area or potential wilderness area.” Tracy Ridge is both a formally recognized “inventoried roadless area,” and has been formally considered for wilderness designation under the Wilderness Act. Rather than taking special care when considering what impacts The Proposal would have on the Tracy Ridge and performing a full EIS as required by law, the Forest Service dismissed commenters concerns about the Proposal’s impact on future wilderness designation, claiming it was “unclear” how opening the trails to mountain bikes would impact the area’s candidacy for protection. While the ANF insists over and over again that mountain biking will not alter the character of the Tracy Ridge area, any mention of the area’s unique characteristics is conveniently excluded. (Commenter #7)

Response: This CFR is specific to proposals that would substantially alter the undeveloped character of an inventoried roadless area or a potential wilderness area. The CFR cites the following:

Examples include but are not limited to:

- (i) Constructing roads and harvesting timber in an inventoried roadless area where the proposed road and harvest units impact a substantial part of the inventoried roadless area.



- (ii) Constructing or reconstructing water reservoir facilities in a potential wilderness area where flow regimens may be substantially altered.
- (iii) Approving a plan of operations for a mine that would cause considerable surface disturbance in a potential wilderness area.

The Tracy Ridge Project falls far short of the impacts of these types of activities.

## Research

The EA cited a number of research studies that analyzed the impact of mountain bike use on trails. The consensus is that mountain biking has no more impact on resources than hiking. During the comment period, additional research citations were received. This section will discuss the research and its implication for the findings in the EA.

Comment #121: The ANF admits in the EA that scientific study of the effects of mountain biking is inconclusive, and thus its effects, particularly in the Tracy Ridge area specifically, are unknown. Erosion is bound to occur on any established trail, even when used by hikers alone. The distinction between hiking on foot and mountain biking through trails is not the type of degradation, but the severity. As mentioned above, there is limited reliable data on the impact of mountain biking on trails, and studies have yielded conflicting results. A study observing the biophysical changes surrounding a new bike trail were observed by one researcher in Wisconsin, who concluded that soil and vegetation underwent a period of rapid change when the trail first opened, but that the change soon tapered off, with the most important factor influencing trail impacts being slope. (Commenter #7)

Response: In preparing the EA, a thorough review of current literature was conducted. Overwhelmingly, research on the effects of mountain biking concluded that hiking and bicycling result in similar effects. One study (Pickering et al. 2009) was cited by the EA and found that some of the existing body of mountain bike research may not be replicable in “real-world” trail conditions. The research review did not find “conflicting results” and did not find that mountain bike trail use resulted in more severe effects. The commenter did not provide any research that substantiates the claims made in the comment above.

Comment #122: The most recent study found significant impacts related to erosion from skidding, linear rut development, systematic addition of technical trail surfaces, and additional unauthorized creation of informal trails. Breaking and sliding activities loosen track surfaces, displace soil down slopes and create ruts, berms, or cupped trails. Tire tracks are continuous and therefore form ruts and long rills through which water can flow, exacerbating erosional losses. Riding wet and muddy trails causes ruts to appear and ruts can lead to more damage as users try to avoid them by moving to the side, which widens the trails or causes multiple trail ruts. All of these impacts are unique to mountain biking. (Commenter #7)

Response: The Davies and Newsome (2009)<sup>12</sup> study cited above was thoroughly reviewed to determine whether its findings would invalidate the conclusions drawn in the EA. The study did not find “significant impacts related to erosion from skidding, linear rut development, systematic addition of technical trail surfaces, and additional unauthorized creation of informal trails.” The study (p. 14) did find that informal trail development and user-built technical trail features was an issue in the John Forrest National Park in Western Australia. To be sure, user built trail networks and unsanctioned

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<sup>12</sup> Davies, C., Newsome, D., 2009. Mountain Bike Activity in Natural Areas: Impacts, Assessment and Implications for Management. In: A Case Study from John Forrest National Park, Western Australia. Sustainable Tourism Cooperative Research Centre Report, Griffith University, Gold Coast.

technical trail features are a concern where they occur. However, the suggestion that mountain bike use of trails will ipso facto result in user built trails and unsanctioned trail features is simply false. On the Allegheny National Forest, mountain bikers – for many years – were limited to a few trails that were not built or maintained for their use. Several trail systems were closed to bike use. These are the conditions that can often lead to illegal trail building. However, on the Allegheny National Forest, this did not occur.

The Davies and Newsome study also reported that mountain bikes – compared to other users – can cause different types of erosion. Impacts are more severe when conditions are wet or the topography is steep. The study did not, however, attempt to quantify or qualify the differences between hiking and bicycling trail impacts. In conclusion, the study found that “it can be difficult to attribute erosion to a particular group” (Davies and Newsome, p. 6).

During the comment period, another commenter provided a link to a report prepared for the National Park Service for the Big South Fork National River and Recreation Area. This study<sup>13</sup> found that of trail systems open to various user groups, ATV and equestrian trails had the highest frequency of soil erosion and muddiness (compared to hiking and bicycling trails). In this study, the bike trails were found to be in the best condition, although the study noted (pp. 21-22) that the bike trail mileage and usage was less than other trails. Additional research<sup>14</sup> submitted during the comment period, found “no significant differences between the level of impacts caused by mountain bikers and walkers under the conditions tested” (Chu and Kriwoken, p. 339).

Overall, no research was provided during the comment period that shows bike use of trails results in deleterious impacts to the trails or resources. At most, research shows that hiking and biking impacts are similar – with some studies showing that biking impacts are less profound than hiking.

Comment #123: According to one study, impacts vary depending on the style of riding on the trails, which further confounds the reliability of the little data that does exist regarding trail impacts. More aggressive riding styles such as downhill riding, free riding, and dirt jumping tend to be more damaging than the cross-country style that is typically slower paced. The ANF appears to dismiss the consideration of aggressive riding techniques. In one breath the ANF claims the need for the Project at Tracy Ridge is to provide a more “backcountry” riding experience with less uniform trails (page 20 of the EA), and in the next the ANF assures us that mountain bikers won’t go off-trail because they prefer the easiest path to travel. (page 27 of the EA). Every assumption in the Project is made to skew the conclusions in favor of opening the trails to mountain bikes. Either the ANF is completely ignorant to the actual practices of mountain bikers or its statements are deliberately disingenuous and misleading. (Commenter #7)

Response: The commenter cited the Davies and Newsome study (2009) for the comment related to various bike riding styles. The study (pp. 2-4) discusses these riding styles. As described in the EA, the Tracy Ridge trails are mostly ridgetop with fairly gradual grades and slope. (The trail down Johnnycake Run, discussed in the EA and in this response to comment, is a bit steeper.) The terrain at Tracy Ridge does not lend itself to the more “aggressive riding styles” such as downhill, free riding and dirt jumping. Free riding and dirt jumping require built or natural trail features – these features do not exist at Tracy Ridge. As the study pointed out, downhill bikes are typically heavy and users look for shuttle services (or the trails are “lift-serviced”). Tracy Ridge does not offer these amenities nor does it have the topography for downhill riding. The most likely style of riding at Tracy Ridge will be cross

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<sup>13</sup> Marion, Jeffrey L. 2006. Assessing and Understanding Trail Degradation: Results from Big South Fork National River and Recreational Areas, United States Department of Interior, National Park Service.

<sup>14</sup> Chiu, Luke and Lorne Kriwoken. 2004. Managing Recreational Mountain Biking in Wellington Park, Tasmania, Australia, *Annals of Leisure Research*, Vol. 6, No. 4, 339361

country – a style described in the Davies and Newsome study as riding “at relatively slow speeds” (Davies and Newsome, p. 2). Furthermore, the study reports that cross country riders are motivated by “... solitude, being close to nature, and the inaccessibility to motorized vehicles” (Davies and Newsome, p.2). These motivations are a perfect match for the conditions at Tracy Ridge.

Comment #124: Numerous scientific studies exist regarding the natural resource impacts of mountain biking showing that mountain bicycles do not disturb the environment any more than hiking. For instance, several studies show that mountain bicycles cause less erosion than other activities, including hiking and horseback riding ... These scientific studies are remarkably consistent in their findings. The range and depth of sources, from academics to government researchers, suggests that these studies were objectively conducted to determine what, if any, impacts mountain bicycles have on the environment. The findings of the EA reflect the conclusions of these independent studies. (Commenter #10)

Response: This comment has been reviewed by the responsible official and is noted. This comment also provided additional literature citations that support the findings in the EA.

Comment #125: The EA cites several research papers on both this subject and the subject of damage to trails caused by mountain bikes. Three of the papers cited in the EA are included in a compilation of research that was written by Gary Sprung and is posted on the IMBA web site. Not surprisingly this compilation includes only research supportive of mountain bike use---just as all the research listed in the EA is supportive of the recommendation to permit mountain bikes on portions of the Tracy Ridge trails. (Commenter #17)

Response: The research referenced in the EA was cited in literature reviews compiled by non-IMBA researchers. The EA referenced the research that was available and consistently cited by researchers. Other than Vandeman (addressed below), the commenter did not provide any additional research that would invalidate the findings in the EA.

Comment #126: I am skeptical of the conclusions provided in papers cited on IMBA's website; and I am not the only skeptic. Michael J Vandeman analyses several of these research papers in "The Impacts of Mountain Biking on Wildlife and People", [http://www.culturechange.org/mountain\\_biking\\_impacts.htm](http://www.culturechange.org/mountain_biking_impacts.htm), with references at the end of the paper. The bottom line is that the research quoted in at least 3 of the papers quoted is flawed. The details are available at the web reference. (Commenter #17)

Response: Mr. Vandeman's analysis appears to be an opinion piece or is in a “blog-post” format – it was not published or peer-reviewed. There is no conclusion that the research is flawed – the overarching argument from Mr. Vandeman seems to be that since bikers travel farther on trails, the impacts will be seen further from trailheads (when compared to hikers). Despite the lack of peer review, Mr. Vandeman's piece was reviewed and did not provide any information that invalidates the conclusions in the EA.

Comment #127: Informal trail development is also a problem observed by researchers studying mountain bike biophysical impacts. In one study, researchers measured a 2.54 kilometer informal trail network. Informal trails are created by bikers looking for a more challenging ride, to create a short cut, or to connect to other existing trails. The tendency of mountain bikers to create informal trails or to ride on trails designated for hikers only is an important consideration at Tracy Ridge because of the interconnected trail system that exists in ANF. While the Proposal opens up about 12.5 miles of the trail to mountain bikers, those bikers are arguably even more likely to ride straight onto existing prohibited trails connected to the proposed multi-use trails than they would be to forge informal trails. This is exacerbated by the fact that several of the trail cut-off points for use by bikes involve steep slopes that would likely be attractive to mountain bikers. (Commenter #7)

Response: The commenter makes a number of generalizations with little relevance at Tracy Ridge or across the Allegheny National Forest. As stated in the response to comment #122, informal trail development is not an issue on the Allegheny National Forest. Where informal trail development occurs, it is not from random mountain bikers looking for a “short cut.” The unauthorized trail development results from individuals actually building the trails. And that occurs because of a culture that either encourages the activity or ignores it. The Allegheny National Forest has an excellent relationship with local mountain biking clubs and there is no culture that condones or encourages illegal trail building.

Comment #128: In the Scoping document for the proposed amendment to the Forest Plan, the ANF cites an inability to maintain the Tracy Ridge trails. Studies have shown that mountain bikers prefer to bike on meticulously maintained trails, and that in order to keep bikers interested in riding the trails, decision makers should be prepared to spend public funds on trail maintenance and develop a plan for additional spending on trail assessments and monitoring in order to obtain the necessary resource protection benefits for users. The ANF believes that volunteers from local organizations interested in biking will relieve them of the responsibility they now have to upkeep the trail for hikers, but the EA provides no concrete evidence of that pledge for support. (Commenter #7)

Response: One study<sup>15</sup> was provided to support the statement that mountain bikers “prefer to bike on meticulously maintained trails.” The study considered the role of trail condition and site layout on the recreation demand for mountain bike trail systems in North Carolina. The study (p. 16) found that “users when faced with choice decision about outings to mountain biking sites tended to favor mountain biking sites having non-degraded trail conditions as well as site layouts that offered complexity and challenge.” The Tracy Ridge trail proposal from local mountain bike groups is consistent with this study – the system offers a loop riding experience that will provide challenge to some users – primarily beginners and intermediate riders. The Clubs’ offer of trail maintenance is consistent with the desire of mountain bikers to utilize areas with trails that are not degraded.

## Commenters

#1: Todd McMahon

#2: John Noel Bartlett

#3: Michael Toole, North Country Trail Association, Allegheny National Forest Chapter

#4: Bruce Matthews, North Country Trail Association

#5 Adirondack Mountain Club

#6 Allegheny Defense Project

#7 Friends of Allegheny Wilderness

#8 Pete Dzirkalis

#9 Matt Husted

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<sup>15</sup> Siderelis, Christos, Michael Naber, Michael and Yu-Fai Leung. 2010. The Influence of Site Design and Resource Conditions on Outdoor Recreation Demand: A Mountain Biking Case Study, Journal of Leisure Research, 42; 4.

- #10 International Mountain Bicycling Association
- #11 Northern Allegheny Mountain Bike Association
- #12 National Park Service
- #13 Luke Bobnar
- #14 Martin Herman
- #15 David Johnson
- #16 Edward Lawrence
- #17 Richard Ostheimer
- #18 Andrew Scanlan
- #19 Wade Smith
- #20 Christine Toole
- #21 Piper VanOrd
- #22 Michael Vitti