

Appendix F – Response to Substantive Comments on Government Camp Trails Preliminary Analysis

The proposed action and preliminary analysis for the Government Camp Trails Project was made available for public comment, (36 CFR 215, 5/13/03). Letters and e-mails were received during the 30-day comment period, which ended on August 11, 2005.

The responsible official has considered comments received and has developed the Government Camp Trails Project Environmental Assessment in response to those comments.

This appendix responds to the substantive comments. Some of the letters, and e-mails contained similar comments, which will be combined for the purpose of response. Substantive comments are comments that are within the scope of the proposed action, are specific to the proposed action, have a direct relationship to the proposed action and include supporting reasons for the Responsible Official to consider (36 CFR 215.2).

The full text of letters and e-mails are in the analysis file; the following is a summary. The agency responses are in italics below. In the italicized responses, page numbers refer to the Government Camp Trails Project Environmental Assessment unless otherwise specified.

A letter containing the following comments was received from Jan Sands.

***1A:** I strongly believe the Crosstown Trail should be closed to mountain bikers. It is not safe to have them on this trail. This is also true for the Alpine and Glade trails. These trails should be off limit to 4-wheelers.*

Response: The Crosstown Trail was designed for mountain bikers, hikers and Nordic users. It has adequate tread and clearing width, sight distance, and trail surfacing to safely support these uses. The Alpine and Glade Trail are not legally open to 4-wheelers in the Mt. Hood Forest Plan. They are open to mountain bikes. The proposed action includes the Timberline to Town trails which would be a designed mountain bike trail to address safety concerns on the Alpine and Glade trails.

***1B:** The current situation regarding Ski Bowl and Multorpor Lodge is confusing and irritating regarding paying use fees. The trails need to be clearly marked and open (free) for all users.*

Response: See the response for Comment #3A below.

A letter containing the following comments was received from Oregon Natural Resources Council

2A: Because this area is growing in recreational popularity, impacts to stream quality at trail crossings could be significant absent appropriate bridging and other mitigation measures. We are deeply concerned with the potential damage bike tires have for wet areas such as stream crossings. Bikes contribute far more sediment and damage at stream crossings than do hikers and skiers. Please address this issue and appropriate solutions in the upcoming EA.

Response: All new trails include bridges over streams, and boardwalks and turnpike over wet areas to prevent impacts to water quality. See Design Notes on Table II-1 and II-2 of the EA and the Design Narratives in Appendix G of the EA for stream crossing and wet area structure design standards.

2B: The Proposed Action and Preliminary Analysis do not identify Wilderness or roadless areas as an issue. However, there is some overlap with the proposed Lewis and Clark Mt. Hood Wilderness. If the Timberline to Town Trail is to be constructed as proposed, impacts to Wilderness must be analyzed as part of this proposal. ...There are already several mountain bike trail routes from Timberline Lodge to Government Camp, therefore we don't see a need for an additional route, especially as it conflicts with Wilderness. ...We suggest that you either designate this proposed trail for hiking and cross-country ski use only, or change the route to avoid the proposed Wilderness.

Response: The wilderness legislation introduced by Senator Wyden in 2004 was not acted upon by Congress. No wilderness legislation for this area is pending in Congress at this time. The portion of the project area near Sand Canyon was identified in 1979 RARE II (Roadless Area Review and Evaluation) and allocated to non-wilderness uses at that time. The Forest Plan subsequently analyzed this area and allocated it to A11 Winter Recreation Area. Section 3.12 of the EA addresses the effects of alternatives on the adjacent Mt. Hood Wilderness as well as the unroaded character of the project area. The Timberline to Town trail was designed to address safety issues on the Alpine and Glade trails which were constructed as downhill ski runs and never designed for mountain bike use. The Timberline to Town trail design required numerous switchbacks to address the grade issues from the terrain drop, tried to avoid criss-crossing the Alpine and Glade trails to discourage bike use on those, and avoid steep canyons and wet areas to address water quality concerns where possible. The trail attempted to stay out of the area mapped in the 2004 proposed legislation, while meeting the above criteria. Designation of the Timberline to Town trail for hiking and cross-country use would not address the safety and design issues identified in the Purpose and Need for the project (Section 1.3.2 of the EA).

A letter containing the following comments was received from Wendy Evans.

3A: Alternative 2 will only be successful if there is full commitment on all parties to insure that all existing trails and those built as part of the Government Camp Trails Master Plan will remain open to the public for a free use common corridor. This is not meant to preclude developing a system to pay for winter trail grooming, or other amenities, but it does mean:

If any of the Forest Service owned parcels identified in the Government Camp Community Design Plan are exchanged and become private, any trails (existing or planned in the Trails Master Plan) would be retained either in the same or similar location at the expense of the proponent. The new owner can not charge for the existing trail use or put up a “No Trespassing” sign.

Folks using portions of these trails passing through Forest Service Special Use permit areas can not be charged just to pass through the area.

Agreement on something this huge, involves more than a Forest Service EA or an informal meeting between the Forest Service, permittee, and Community Planning Organization/TIF Chair and Vice Chair. We need a commitment that will span planning efforts, administration, personnel and permittee changes.

Response: In Section 2.4.1 of the Proposed Action as well as page 2 of the Decision Notice under Rationale, explains that implementation of the Proposed Action includes the signing and/or fencing that is mutually agreeable to both parties will be installed in the Multorpor area that will “define and maintain for the future, a “common corridor” for hike/bike/Nordic ski use and reduce conflicts with other users.” An additional statement to clarify the intent was added to say that “This common corridor would have no special fees or restrictions in this section that would differ from the rest of the trail system.” Future operating plans for the ski area would need to comply with the Decision Notice for this project.

3B: The purpose and need for the EA was developed to include connecting Government Camp to key recreation destinations. While this is not a bad idea, it needs to be clarified that even though the Clackamas County Commissioners are the project proponent, the Tax Increment Finance (TIF) District:

- *cannot fund trails outside of their boundary (Trillium Bike Trail)*
- *should not be expected to fund mitigation for other existing or impending projects ...including construction of the Trillium Bike Trail that would mitigate the impacts of the Tamarack Quarry Rock Haul Project.*

Response: In Section 1.3.2 of the EA, under the first need, it was clarified that trails that extend beyond TIF District boundaries could not be funded with TIF funds. Clarification was also added in Section 1.1 of the EA that portions of the Government Camp Trails Project Area lie outside of the TIF boundaries.

3C: *The issue of funding the trails (both construction and maintenance) must be addressed by all parties involved. There needs to be a coordinated assessment of all of the “trail” maintenance that occurs annually and a coordinated effort to manage the various recreational uses on the trail and road system around the community.*

Response: Appendix H of the EA outlines potential funding sources for both construction and maintenance of the trail system.

3D: *It is not clear if any of the new trails would be open for equestrian use. Will horse, dogsleds and other forms of amusement operated by permittees be allowed on the West Summit Fen Trail, Barlow Tie etc. and others?*

Response: Section 1.3.2 as well as Table II-1 outlines the intended uses for these trails. Appendix G also contains the design standards including the intended users of the proposed trail system.

3E: *Snow cat grooming for the Barlow Ski trail should not be precluded. There may be times, especially with a “normal” snowfall, that grooming or packing it would be helpful. It is wide enough for a small snow cat and has been occasionally used by PGE to access the utility line over the snow during outages.*

Response: Appendix G was modified to clarify that the upper Barlow Trail would continue to be groomed but that the lower Barlow and Barlow Tie Trail would not be groomed without special authorization in order to protect the historic resources in the area.

3F: *No mention is made as to the status of the Summit Ski Area’s XC Trail system (currently shown as existing). Will it be part of the “public” trail system or what?*

Response: The trails are shown as existing trails on the map. No improvements to these trails were recommended by the project proponents and therefore were not considered. The Summit Ski Area currently has the option under their permit and operating plans to maintain and operate these trails as open to the public. They may charge a fee but are not required to do so.

3G: *No mention is made of the need to have a clear trailhead for the East end of Cross Town Trail. Currently the large trailhead map (which remains high in the air year round) is on the west end of the Summit Day Lodge (at the edge of the parking lot). The bike trail currently seems to switch back through the permit area up to Crosstown Trail. In the winter, it’s not always clear how the cross-country skier and snowshoers are supposed to access the east end of this trail. Most of the guide books indicate the eastern trailhead at the Summit Ski Area.*

Response: Improved signing for trailheads and trails are planned as part of this project (see Section 2.4.3 of the EA). A final sign plan has not been completed but will be available for review by the community before it is done.

3H: *Snowboarders are not included as current primary use on Alpine Trail. They will continue to ride out into the Summit Ski Area in the winter. Residents and guests will continue to go through the Ski area to get to the east end of the community.*

Response: Snowboarders and their use of the Alpine Trail or Summit ski area were not brought up as an issue during the planning process. Nor was it identified as a need that this project was to address.

3I: *Snowshoe use seems to have been minimized in this document. Its increase has occurred rapidly over the last 10 years. Generally trails within the TIG boundary are managed for both uses. The signing program implemented last winter in the Trillium area has great potential for use in other areas to minimize conflicts between the 2 uses. There is a need to identify trails for snowshoers. The 2 hike/bike trails (Timberline to Town and Trillium Lake) should be considered to be designated as snowshoe trails.*

Response: As stated above, the sign plan identified in Section 2.4.3 of the EA for the trail system has not been completed; however the third need in Section 1.3.2 of the EA echoes the comment in the letter. The Nordic trails have design standards outlined in Appendix G of the EA that are intended to accommodate grooming for both uses in a fashion to reduce conflicts between the users. The sign plan will be developed with input from the community on where signs will go, where additional signing is needed, and how they will be worded.

3J: *How will the Trillium bike/hike trail impact the portion of the existing Trillium Lake loop currently closed to mountain bikes and typical weekend congestion along the open section? Could this loop trail around the lake be opened entirely to bikes?*

Response: The need to open the Trillium Lake Loop Trail was not identified during the scoping and planning process. Appendix G of the EA outlines the design standards for this trail. The proposed Trillium Bike Trail will use a short section of the Loop Trail to get bikers to the interior campground road. It says that trail signing will be necessary to warn Loop trail users of the shared use section and that additional clearing may be needed to provide adequate sight distance. There are no plans to open the rest of the Trillium Loop Trail to mountain bike use. A loop opportunity is provided by traveling through the campground and day use areas and around the lake on the road. There is a concern that with the heavy use on the Loop Trail and the designation of this trail for wheelchairs and strollers, that bikes would cause conflicts and safety issues on the rest of the trail.

3K: *While most of the project area is in A11 Winter Recreation allocation ...and managed to “provide areas for high quality winter recreation (and associated summer) opportunities including: downhill skiing, Nordic skiing, snowmobiling, and snowplay”, there are no trails within the Government Camp TIF boundary that are open for recreational snowmobile use. The 1981 (current) Ski Bowl Master Plan states that other than for administrative use, snowmobiles are prohibited in the ski area. ...There needs to be clarification in this document that snowmobiling in and around the community is not planned (or appropriate) as a future trail use because of the safety concerns and conflicts with existing uses.*

Response: The management direction for A11 was taken verbatim out of the Forest Plan. It was intended for all A11 areas as general direction. Some areas may not be open or provide opportunities for all uses in all A11 areas. Not all A11 areas offer downhill skiing opportunities even though it is mentioned. None of the proposed trails or existing trail upgrades are designed or intended for snowmobile use as concluded by the design standards that document intended uses in Appendix G of the EA. Throughout the EA (purpose and need, proposed action, and environmental consequences) the proposed action is defined as constructing Nordic/hike/bike trails.

3L: *Alternative 3 would create an unacceptable impact on the private land at Summit Meadow as it would encourage use of the Powerline Trail” which is too steep and narrow for a XC trail.*

The issue with the proposed action reads “The proposed action to maintain a common corridor through the base area near Multorpor Lodge may create user conflicts during peak congested time in the winter.” Use conflicts already exist, but with coordinated efforts can be reduced and minimized. Actions in this trail plan should be analyzed so as not to create new or increase user conflicts. At the same time, it is unrealistic to think that there is a simple answer agreeable to all readily available. ...A more objective conclusion about the proposed action might be “The proposed action to clearly mark and indicate the common corridor through the base area near the Multorpor Lodge will reduce existing user conflicts, while providing a safer, more pleasant experience for a variety of visitors.”

Response: The 6th need listed under Section 1.3.2 of the EA clearly describes that the Multorpor area is currently congested. The issue statement in Section 1.4.3 of the EA was brought forward by Ski Bowl personnel as an issue with the Proposed Action and so was framed in that manner. They asked the Forest Service to consider Alternative #3 as another way to address their issue. The effects analysis for recreation in Section 3.3.3.2 of the EA makes a similar conclusion as above that the Proposed Action will adequately mitigate the issues with the congested area.

3M: *It is confusing that the Timberline Express XC Bypass is not shown as a trail on Figure II-1 Map of Alternative 1 No Action, but while it is not mentioned as trail mileage being added as a result of this project, it shows up as a trail on Figure II-2 Map of Alternative 2 – Proposed Action. It should be noted that this trail currently does not exist and if built, would be constructed by the permittee as stated in the mitigation measures of the 2/89 EA Decision Notice for the Expansion of Facilities at Timberline.*

Response: The Timberline Express XC Bypass was a “proposed trail” albeit in a separate planning document and not an existing trail at the time the Preliminary Analysis was released. Since the Record of Decision has since been released, it will be included on the Alternative 1 – No Action map and identified as a future planned trail.

A letter containing the following comments was received from Shelley Hakanson.

IT IS IMPERATIVE THAT THIS LAKE ROAD /SUMMIT TRAIL stay open to FREE USE regardless of development. It is critical to the marketability of the trail system to businesses in Government Camp to say 'free trail system'. By eliminating/reducing public use to the trail privatizes public land. I know that the Zigzag Ranger District has bowed to many of Hannah Corps. demands, reacting rather than giving administrative and legislative direction. The development of the Government Camp area is booming and with it could go all sense of public need.

I believe the Forest Service can be a partner to private landowners in the Government Camp area in the development of a trail used by snowshoers and skiers in the winter and mountain bikers and hikers in the summer. It needs to be scenic, signed well, maintained and kept free from private charges. If fee charges are required through the Ski Bowl areas it could set a precedent for other special use permittees to charge (Timberline and Summit).

Response: The Lake Road/Summit Trail could still be used by Nordic skiers in the future, however, in order to reduce conflicts of maintenance vehicles (this road being the only maintenance route available between the two ski areas), the newly constructed trail should better meet the needs of the Nordic skiers