

Shawnee National Forest Fee Proposal
Federal Lands Recreation Enhancement Act (REA)
Responses to Public Comment

1. Some support the fee proposal, but feel the annual fee is too high. Others support the fees and feel they are reasonable.

Response: The comment related to the fees' being too high was made repeatedly from the public. Although the fees were proposed based on analysis of many factors, these comments will be taken into consideration in making a final decision.

2. Some feel there should be no fees levied, since taxes are paid to support work done on public lands.

Response: Recreation fees are just one element of the Forest Service's sustainable recreation program. In addition to fees, recreation efforts are provided through appropriations, the efforts of volunteers, and through partnerships with the private sector. Fees are an important way to target funds for the services and amenities actually used by visitors. For every fee dollar paid, at least 80 cents stays in the Forest where it was spent. Those who use the service help contribute to its provision. REA was not meant to replace our entire appropriated budget. It was meant to supplement that budget at a time when rising costs and lower appropriations are impacting the capabilities of forests and parks to provide recreational opportunities.

The Shawnee proposal will allow us to continue to provide and develop quality amenities at the developed recreation sites where fees are to be charged and to allow us to further develop, improve and maintain our designated trails system.

3. Some feel there has not been enough work done on the designated trail system to warrant charging a fee.

Response: Many trails throughout the Forest require maintenance or reconstruction in order to be sustainable. The Forest is committed to doing this work. While the work progresses, however, people continue to use the system of 379 miles. Because of the size of the Shawnee trail system and the magnitude of the work involved in mitigating impacts, it will take time to repair all trails. The work has been prioritized and is occurring first in congressionally designated wilderness to improve trails to withstand all weather use without rutting, braiding or excessive muddiness. Work has also begun in some of the most heavily used areas outside of wilderness. In all cases the work is designed to increase the

environmental sustainability of the trail system by designing and building them to withstand stock use. Constructing and maintaining trails to a sustainable standard is labor-intensive and expensive everywhere. On the Shawnee where many of our soils are fine textured and prone to erosion, or are wet through much of the year due to high or “perched” water tables, extra expense is necessary to import gravel, build turnpikes or take other measures to protect trail surfaces. The “Special Recreation Permit” category in REA authorizes the collection of fees to protect the natural resources that are impacted by specialized trail systems, including those that are designed and constructed for equestrians.

4. Some feel trail riders are being targeted with additional fees.

Response: This comment was primarily concerned with the fact no fees are proposed for hikers. The level to which the designated trails are designed and maintained is to support horse traffic, even though the trails are also used by hikers. REA authorizes the Forest Service to collect fees for the use of specialized trail systems to offset some of the cost of providing that system. The costs associated with the trails in our fee proposals are associated with the design, reconstruction and maintenance of a sustainable system of trails for equestrian use.

5. Some feel the Shawnee has not adequately sought alternative sources of funding.

Response: The Shawnee has funded trails construction, reconstruction and maintenance through our regular appropriated budget. Also, every two years each forest in the Eastern Region has the opportunity to request additional funding for its top priorities. The Shawnee has seized this opportunity to obtain over \$1 million in additional trails money. In addition, we are partnering with the Shawnee Trails Conservancy in seeking a Recreational Trails Program grant through the Illinois Department of Natural Resources Grants Program for additional trails work. Our proposal to charge fees for some of the facilities offered on the Shawnee, based on REA, is another alternative source of funding we are seeking to continue expanding our designated trails and to support our developed recreation sites.

6. Some feel the work should be done with volunteers rather than charging fees and paying contractors or Forest Service crews to accomplish the work.

Response: Volunteers make important contributions in both the trails and developed recreation areas of the Shawnee. In 2007 the Shawnee benefited from several thousand hours of volunteer assistance, including an all volunteer effort to surface a portion of Trail 498 at the Wilson Tract north of Petticoat Junction. Over 1000 hours of trail work were donated in

March of 2008 alone by volunteer students who visited the forest to clear storm damaged trees in the Bald Knob and Clear Springs Wildernesses. Much of the work is currently being done on the Mississippi Bluffs RD, but we hope to have additional opportunities on the Hidden Springs District soon. We will have two types of opportunities. The first type would be trail maintenance. In this instance organizations or individuals could “adopt” a given trail to saw out logs, lop back encroaching brush and do basic maintenance of water control structures, signs and other trail features. The second type is trail reconstruction, which usually involves moving the trail to a new location (an example would be the newly completed reroute around the “Coyote Club” in the Lusk Creek Wilderness). This second type of opportunity is well suited to volunteer groups or organizations. Of course, we continue to welcome the efforts those people who, anonymously, take the extra time to move logs off of the trails, pick up trash and perform numerous other tasks on trails and at trailheads.

7. Some feel we are proposing to charge fees, while we are removing amenities.

Response: At one time the Shawnee managed almost 90 individual recreations sites where we mowed grass and/or provided picnic tables and trash cans, fire rings or some other equipment. Maintaining this level of infrastructure was a tremendous undertaking requiring a large labor force. When we lost the ability to use the Senior and Community Service Employment Program (SCSEP) due to changes in the program by the Department of Labor, we lost dozens of employees who had worked in our recreation areas mowing grass, collecting trash and cleaning. To compensate the Shawnee has removed equipment from some areas of the forest. In making the decision about where to cut back we looked at the available data concerning the level of use, as well as an assessment of the costs involved at each area.

To keep up with increasing program costs the Shawnee has looked for ways to improve the efficiency of our maintenance activities. In many areas we have removed trash cans, decreased the acreage of grass that we mow and shortened the number of days per year that facilities are open. In the Johnson Creek Recreation Area, we have closed the single-family campground loop for the past several years and still have been able to meet demand. At the same time, we have added facilities at the Johnson Creek equestrian trailhead where demand is increasing. We will continue to monitor which facilities are in demand so that we can make decisions about how to spend our limited resources. Recreation fees, which we intend to spend both wisely and efficiently, will allow us to improve our delivery of services.

The Shawnee has proposed fees for use at 8 of most popular day-use sites across the Forest. REA has stipulations concerning the type of amenities that are to be provided at these sites. We propose to use fee revenue to help us to maintain these sites to agency standards of health and cleanliness and to continue to provide the types of amenities that REA stipulates.

The Shawnee has recently added over 150 miles to our designated trails system, which now totals 379 miles of equestrian/hiker trail. Under REA, the proposed fees for use of this system are in a different category than that which governs fees at day-use recreation areas. The Special Recreation Permit category for use of specialized trails authorizes national forests to use a minimum of 80% of collected revenue to help pay the costs of managing for certain types of trail uses, including equestrian use. The Shawnee proposes to put this funding to use maintaining our expanding designated trail system.

8. Some feel that horses have no impact; therefore, trail maintenance is unnecessary, and we don't need to charge fees. Some feel horses do impact the land and are supportive of efforts to mitigate damage.

Response: Researchers have described the potential for impacts on equestrian trails by examining the pressure exerted on the trail tread by a heavy animal with a relatively small foot. In a 2004 paper, Newsome et al. discuss the resulting implications for soil compaction and the dislocation of surface material on the trail tread¹. Other studies, including Marion (2005), discuss how proper trail location and maintenance can be used to mitigate these impacts.² Proper trail location and maintenance is expensive, especially in areas that require surfacing with gravel, turnpikes or similar work. The Shawnee is proposing to use fee revenue for the continued maintenance and improvement of equestrian trails as a means to improve their sustainability.

9. Some stated they would not be opposed to increases in existing fees as long as an increase in upkeep efforts was instituted.

Response: REA stipulates that 80% of the proceeds be spent on projects. The Shawnee is committed to using this money to enhance facilities and services at developed recreation areas, and to improve trails.

10. One individual felt he would not enjoy the Forest if he had to pay to drive through.

Response: We are proposing fees for equestrian use of designated trails and some developed recreation sites only. We are not proposing any fees for driving through the Forest.

11. One individual was opposed to the day use fees, but also wanted to see additional personnel present.

Response: The Shawnee would like to be able to provide additional personnel at our developed recreation areas, especially during those times of the year when use is heaviest. This situation is typical of national forests today. The Shawnee proposes to use some of the fee money collected to seasonally hire additional maintenance help within sites where fees are charged.

12. The rate increase is fine, but if you want people to come and use the forest you have to improve the sites, not take things away.

Response: We are aware that many Shawnee sites have less development when compared to other public or private campgrounds or parks in this area. Most other campgrounds or facilities have been built more recently than ours and their high level of development responds to the desire people have for amenities such as full hookups and showers. While we feel that it is appropriate to continue to offer some lower development camping and picnicking opportunities for those that enjoy this, we would like to make some modest improvements for the sake of attracting additional visitors. Some examples of this would include adding electrical hookups to some of the campsites in the campgrounds at the Pounds Hollow and Johnson Creek Recreation Areas. We do not currently have the funding to add such amenities in these areas. Other organizations had similar problems prior to implementing REA authorized fees. Recently they have been able to begin a campaign of recreation site improvements. We would like to do the same for the Shawnee

As for the trail system and the proposed fees there, a great deal of time and effort is being spent on improvements to the trail system. This work will continue as long as we have trail funding. It will continue at a much faster pace if we can use REA to provide additional opportunities to improve equestrian-related facilities/services. The Shawnee National Forest's Trails Designation Project, coupled with our emphasis on the construction and maintenance of environmentally sustainable trails will result in what will, arguably be the finest trail system in the Midwest. We feel that this will have tremendous implications, encouraging people to continue to travel to Southern Illinois.

13. Your proposal has not worked in other states and it won't work here.

Response: REA has been successfully applied to national forests, parks, wildlife refuges and Bureau of Land Management units across the country.

In the Forest Service National Visitor Use Monitoring Survey of 2006, 83% of visitors reported that they were satisfied with the value received for the fee paid. In the case of the trail system in the Shawnee National Forest REA could be particularly effective. This Forest has completed the environmental analysis necessary to 1) designate over 150 miles of additional trail, and 2) maintain or reconstruct these trails. Additionally, we have built the capability within the Shawnee organization to design, locate and construct environmentally sustainable trails, capability we did not have just a few years ago. The Shawnee is committed to ensuring that fee revenues are spent wisely in strict accordance with REA regulations. Recreation fees could be used to benefit users here to a greater degree than what could be expected in places that have not done the work necessary to have their trails program ready to implement.

14. Some felt we need a senior discount for equestrian use.

Response: The Recreation Enhancement Act, as well as Forest Service guidelines for its implementation, establish various types of discounts for certain types of facilities including half price for seniors at campgrounds and free admittance for seniors to picnic areas. However, REA specifically does not offer any discounts for seniors toward the purchase of a special recreation permit, which is the category that includes the fee for equestrian use of trails.

15. We should not charge a fee because other aspects of a trip to the Shawnee are expensive (gasoline, health certificates)

Response: We, too, are concerned about rising costs reducing disposable income and its affect on tourism. Unfortunately, costs faced by the forests and the entire federal government are also increasing just like costs for individuals. We are proposing the fee structure to meet current public demand for services.

16. Some people wanted to know what we were going to spend the money on and how will they know we are following through.

Response: REA, and the guidelines that the Forest Service has developed for its implementation, define the way in which fees can be spent in two important ways. First, REA acknowledges that there will be administrative costs associated with implementation, but it limits these expenditures in the following manner. Five percent of revenue is retained at the regional level of the Forest Service to fund the Recreation Resource Advisory Committees and other expenses, including special projects. Individual national forests incur expenses for collecting and accounting for fees, as well as for printing costs for tags and permits. REA places a cap on such expenditures at 15% of revenue collected. The remaining

80% of the revenue is reserved for the implementation of projects on the individual forest. The second important way that REA guides fee expenditure is through the limitations it places on the types of services or projects that can be funded with the money.

The Shawnee National Forest proposes to collect fees at developed recreation sites as well as for equestrian use of the designated trail system. We propose to use this revenue to help us to cover the cost of facility maintenance or reconstruction. The guidance below concerning expenditure of funding is from the Forest Service REA Implementation website and can be found at <http://fsweb.wo.fs.fed.us/rhwr/recfee/fm.shtml> . The Shawnee will follow this guidance in the implementation of any REA proposal.

3. Repair, Maintenance and Facility Enhancement

Includes deferred maintenance, capital improvements and routine operation and maintenance activities that are directly related to visitor enjoyment, visitor access and health and safety.

- Routine operation and maintenance activities and activities to address maintenance concerns that were previously delayed due to lack of funding, materials or labor (deferred maintenance).
- Capital investments (over \$5,000) in facilities, including site reviews, permits surveys and design.
- Buildings and campgrounds, including inspections, removal of hazardous trees, mowing, pruning, general landscape maintenance and pest control
- Exhibits and waysides
- Historic structures and other cultural facilities
- Roads, trails, bridges, waterways, “Special Features” areas
- Utilities, sanitation systems, trash collection
- Structural fire prevention
- Health/safety signs
- Preparation of operation and maintenance plans
- Accessibility retrofits and enhancements
- Energy conservation improvements
- Enhancement of archeological and cultural resources through archeological surveys, museum collections, ethnography, history and restoration of historic structures
- Installation of erosion control devices, fencing, trail relocation, road and trail closures, site hardening, installation of devices to improve air and water quality, control of invasive plants and animals in the immediate recreation site vicinity as a result of visitor use

17. Some felt we should implement a volunteer program to offset the annual fee.

Response: REA also authorizes the Interagency Pass program offering some discounts to seniors, persons with disabilities and volunteers who have amassed 500 hours of service. However, none of these passes are valid for the REA category of "Special Recreation Permits" which includes fees for trail use. Likewise we find that other forests with REA trail fees have not combined their volunteer and fee programs. We are continuing to study this issue.

18. Some wanted to make sure the money goes back to the Shawnee and not to other agencies or departments.

Response: REA is very specific on how collected fees can be spent. 80% of the money is to be spent on projects in the fees sites on the unit where it was collected. Up to 15% can be spent for administrative purposes, once again, on the unit where it was collected. It is the commitment of our Forest Supervisor that as much as the 15% as possible will also be spent on projects rather than administrative costs.

19. How will we get compliance with the fees?

Response: Compliance with fees will be enforced fairly, firmly and consistently.

20. Some felt a family discount should be considered.

Response: The Forest Service implementation guidelines for REA describe discounts available for seniors as well as for persons with disabilities. It also stipulates that some fees will be waived for persons 16 years of age and younger. The Shawnee will incorporate these discounts into our fee proposals. To see how these discounts would apply under the Shawnee proposal visit the following website
<http://www.fs.fed.us/r9/forests/shawnee/rec-fee/drop/>.

21. Does the \$50.00 annual fee cover parking at trail heads?

Response: There will be no additional fee for equestrian use of Shawnee National Forest trailheads, including the trailhead at the Johnson Creek Recreation Area.

22. We already have to pay a bridle fee when we ride the Shawnee.

Response: The Shawnee National Forest does not currently collect any bridle tag fees from any source. In the 2005 federal court order

compelling commercial equestrian camps, whose clients rode on the Shawnee National Forest, to obtain permits, the forest was directed to give each camp tags that they were to give, free of charge, to their customers. The Court specified that the Shawnee was not to charge the camps for these tags, nor were the camps to charge their customers. The tags were necessary to identify which riders were starting from the camps and were thus commercial, from those riders who were non commercial. At that time the rules of riding were different for these two groups and it was necessary to be able to differentiate between the two. The Shawnee does charge the camps for their commercial special use permits, just as we do with other commercial uses of national forest lands. This fee is based upon the number of riders and costs up to a few hundred dollars per year, per camp. However, this money is not returned to the forest for the upkeep and maintenance of trails.

23. How will the comments be used in the process?

Response: The comments will be taken into consideration by the Forest Supervisor in finalizing the proposal, by the RRAC as they formulate their recommendation and by the Regional Forester in making his final decision

24. Where will riding be free?

Response: The Shawnee has proposed to charge a fee for equestrian use of the designated trail system. Riding on roads will continue to be free. In many areas of the forest outside of the Upper Bay Creek, Lusk Creek, Eagle Creek and Big Grand Pierre Creek watersheds, cross-country use continues to be authorized. In areas where cross-country use is authorized, it will continue to be free. Eventually, the Shawnee intends to analyze all areas of the forest to determine if additional trails should be designated. Through this process, which includes public comment, we will study one or two watersheds at a time and make a determination as to whether or not additional trails will be designated in that particular watershed. As the analyses of watersheds are completed, riding in those areas would be limited to the designated trail system. This analysis has already occurred in the Upper Bay Creek, Lusk Creek, Eagle Creek and Big Grand Pierre Creek watersheds and that is why cross country use is no longer authorized there.

25. Some feel user fees will negatively affect tourism.

Response: Many people commented that they are concerned the proposal to charge fees, especially for the use of equestrian trails, would keep people from coming to Southern Illinois. Some people thought that the proposed fee was too expensive while others felt that any fee at all would cause people to drive to Missouri, where fees are not charged for the use

of equestrian trails. People have also mentioned that for some, fees would be the latest in a series of price increases for animal feed, fuel, veterinary and other animal care services that would cause people to abandon equestrian sports all together, and sell their animals.

Prior to publishing our fee proposal in the Federal Register the Shawnee consulted the Hoosier, our neighboring forest to the east. The Hoosier has had a trail fee program in place for ten years. In the first year of their program they were told by some people that they would no longer ride if it meant paying a fee. While there was an adjustment period for riders, demand for riding on the Hoosier continues to be robust. Until this year the daily fee on the Hoosier was less than what the Shawnee has proposed. This winter their price has risen to \$5.00 per day, the same as what is proposed for the Shawnee.

The Shawnee has historically lacked enough designated trails to meet the demand. Much of the riding that occurred took place on a network of non-designated trails that were not maintained by the Forest Service. The lack of maintenance of these non-designated trails created controversy that reached its peak in the early part of this decade. To correct this problem, Forest managers have completed three critical tasks. The first was to undertake the complex and expensive environmental analysis to designate additional trails. The second was to build the capability within our organization to design and construct sustainable trails for stock. The third critical element was securing funding from our traditional sources to begin the work.

To perpetuate the accomplishments that we are now making will require additional funding. In February of 2008 we applied for an additional \$500,000 per year for each of the next two years through our internal budget process. We have had the opportunity to work with the Shawnee Trail Conservancy (STC) to apply for a grant from the state of Illinois. The STC has been able to obtain a grant of \$20,000 from the Illinois Equine Research and Promotion Board. The Shawnee National Forest has pledged \$60,000. Together we have asked for \$320,000 of Federal Recreational Trails Program funding from a grant program that is administered by the Illinois Department of Natural Resources. The initiative shown by STC in obtaining nonfederal, matching funds was the critical step in this process, as it fulfills a fundamental prerequisite of this grant program. Finally, as part of our long term effort to secure funding, we have made use of REA to propose fees that would be collected and put back to work on the trail system. The end result will be, arguably, the finest equestrian trail system in the Midwest. We believe a sustainable trail system will provide a long term positive benefit to tourism in Southern Illinois.

26. Will a permit be required for each animal you own?

Response: No. The permit will be issued to an individual, who can then use the permit with multiple animals. Each rider over 16 years of age must have a permit.

27. Is it a tag or sticker?

Response: The decision has not been made at this time.

28. Some feel the same permit should cover riding and developed recreation sites.

Response: This remark showed up in several responses from the public. This is under consideration.

29. Some felt we need to establish a family price to enable families with children to ride at a reasonable rate or establish a children's exemption.

Response: In the Shawnee proposal, those under 16 years of age would not be required to obtain a permit for riding.

30. Some felt we should publish a report on the fee program highlighting work accomplished mailed to all permit holders.

Response: We will publish and make available an annual report detailing the amount of fees collected, the trails or facilities where the money was spent and the cost of those services or improvements.

31. Some feel there should be reduced fees for people with disabilities.

Response: REA authorizes the "Interagency Access Pass" obtainable free of charge for persons with disabilities, which offers reduced or free admission to many sites on national forests. These passes will be available and offer benefits for every one of the developed recreation sites where the Shawnee is proposing to charge a fee. However, the pass is not to be accepted for reduced fees for special recreation permits, which is the category that includes the proposed fees for equestrian use of trails.

32. Is it possible to get prison workers to do the maintenance?

Response: This is something we can look into. We have successfully used prison crews in the past on various projects.

33. Wilderness is closed from December to April; therefore, it is not a good deal.

Response: It is true that three of the wilderness areas on the east side of the forest have been closed to equestrian use for the past two winters in order to limit use during those times when soils are most saturated. This particular order, along with the closures after periods of heavy rain, was first imposed by the Court as a protective measure for wilderness in those areas that had been receiving heavy commercial equestrian traffic. The order was included in the decision that was made for the Trails Designation Project to protect the wildernesses until trails could be reconstructed and hardened to withstand the impacts of wet weather use. This order affects 50 miles of the 379 miles of designated trails that are available to equestrians across the Shawnee. Many excellent opportunities for riding are unaffected by this order, and the Shawnee's non-wilderness trail system is still comparable with the length of the systems on several nearby forests.

34. Would the fees be area specific?

Response: Fees collected for the use of trails will be spent on trails. Fees collected for developed recreation areas will be spent on developed recreation areas.

35. When a camp gets a permit, will they have a designated trail system?

Response: Camps will have to obtain a special use permit if their customers wish to ride on the Shawnee National Forest. As part of that permit, their guests will be required to use either designated trails or roads. Under the Shawnee proposal, equestrian use on any portion of the designated trail system will require the daily or annual equestrian trail use fee.

36. If we have a bridle tag, will we have to pay for a campsite?

Response: Camp Cadiz and Johnson Creek are the only Forest Service campgrounds where stock can be kept, and yes, you would have to pay for a campsite at these two sites, even though you have a bridle tag. However, dispersed camping is allowed on much of the forest and no fees would be charged.

37. We are building a new ranger station at Vienna. Why couldn't that money be used for recreation sites or trails?

Response: Large expenditures for capital improvements like the ranger station at Vienna are appropriated as individual items in the federal budget. The list of projects awaiting approval is long and only a few projects are approved each year. The Vienna project spent years waiting on the list prior to approval. It will likely be many more years before

another such project would be approved for the Shawnee National Forest. The money being used for the construction of the new ranger station comes from a fund that is reserved for such large capital improvement projects. If the Shawnee were to insist that we did not want the office and would rather be spending the funding in forest recreation sites or on the trails we would only have succeeded in derailing the office project, as the money would simply go to the next building on the list on another national forest. Our developed recreation areas and our trails would not have been helped. In the mean time we look forward to a ranger station that will be an asset to the community, while we continue to seek funding from some sources that have promise of helping our recreation areas and trails.

Every two years the Shawnee National Forest is offered the opportunity to request additional money for smaller capital improvement projects for roads, trails or recreation areas. We have listed trails as our first priority each of the last three times we have made such requests. The money that the Shawnee has received thus far has been put to work rebuilding trails in the Lusk Creek Wilderness and in areas south and east of Jackson Hole. In the last several years we have also been able to obtain this funding to build a new shower house at Lake Glendale, to match Scenic Byway funding to improve the beach at Pounds Hollow and to replace toilets, cisterns, pathways and other features at the Garden of the Gods Recreation Area.

The Shawnee is committed to seeking funding through all means available to us. We will continue to apply for special funding for capital improvement projects through our agency's established channels. Since the passage of REA, fees have become another established channel for land management agencies to look for funding for maintenance and improvements. Therefore, the Shawnee is looking at this avenue as well as a possible long-term source of revenue to help us maintain and improve recreation sites and trails on the Forest.

38. How will passes be sold? Where will passes be sold on the weekends? Will the campgrounds be compensated for selling passes? Will we pay a commission to the vendors? Will rain checks be available? Who will monitor all of this? Will we use the money to hire more people?

Response: Permits will be available for sale at Shawnee National Forest offices or through the mail. We also intend to make permits available at vendors throughout Southern Illinois.

Our chief concern initially was in trying to make obtaining the permits convenient. Our assumption was that the easier it is to obtain a permit the better compliance would be with the fee policy. We had initially envisioned contacting all of the commercial equestrian camps, as well as

many local businesses and asking if they would be willing to sell the permits for us. We anticipated that we would have to reimburse them a small amount as compensation for the time that it would take for them to sell these permits. The more places selling the permits, the more convenient it would be for the users. This convenience would come at a price however, and that is in the amount of the commissions that are given on permit sales as well as the cost for tracking and bookkeeping. The more convenient, the higher the program administration costs. Meanwhile, REA dictates that all administrative costs combined cannot exceed 15% of fees collected. In the end there may only be as many vendors as the program can afford, while still remaining within the REA mandated program cost guidelines. We continue to welcome suggestions for how to deal with vending the permits.

At this time there is no plan to offer rain checks on permits.

The tracking of permit sales and fee revenues will be done by the Forest Service. We will prepare an annual report detailing program income and expenditures including a synopsis of exactly which trails were constructed or maintained with this funding. We will clearly delineate between program administration expenses, which can not exceed 15%, and facility maintenance or construction. The Shawnee has no current plans to hire an additional person to administer this program; our intent is to keep administrative cost as low as possible. We will pay a portion of trail crew salary but only for the time that the crew works on trails that generate fees. Work on hiker-only trails will not be paid for with funding obtained with fees.

Funding collected from the proposed fees in developed recreation areas will be utilized replacing or repairing facilities and equipment, for improvements in facilities and to pay for personnel for the time they spend repairing or maintaining those facilities. The revenues and expenses from developed recreation program will also be included in the annual report that the Shawnee will prepare to detail how the REA is being implemented on the Forest.

39. One individual questioned where he could find OHV, snowmobile and mountain bike trails on the Forest.

Response: There are no trails designated for these uses on the Forest.

40. One individual asked where the statement “the Recreation Enhancement Act looks to those who utilize the specialized trail system to support its upkeep and maintenance” came from.

Response: The basis for this statement came from the Federal Lands Recreation Enhancement Act (REA) - Forest Service Interim Implementation Guidelines, which is available on the web at <http://www.fs.fed.us/passespermits/docs/final-guidelines.pdf>

41. One individual questioned trails as amenities and asked if “High Impact Recreation Areas” were the justification.

Response: The Shawnee assembled our proposal from guidance found in the implementation guidelines mentioned in the response to the previous question. Fees for trail use are discussed in the "Special Recreation Permits" in chapter 4 of that document. The Shawnee did not include the concept of High Impact Recreation Areas in any of our proposals.

42. The Shawnee has received \$4.5 million in trails funding since 1992 and equestrians do not have a completed trail system to show for it.

Response: The Shawnee National Forest has been criticized for the amount of funding that we have received in our trails budgets since 1992. It is asserted that money has been spent and yet the trail system remains incomplete, maps and signs are inadequate and there are seasonal closures of trails.

During this period the most critical problem on the Shawnee is that many of the trails that were being used on the Forest were not designated. The problem was particularly acute on the east side of the forest in the areas around Eddyville and Herod. Agency business rules preclude the forest from maintaining undesignated trails, so many of these routes were impacted by erosion, braiding, excessive width and muddiness. Conditions varied throughout this area but some of the most noticeable impacts occurred in the Lusk Creek Wilderness and in some natural areas. In many cases trails lacked proper location and design, which severely limited maintenance options short of rerouting them to more suitable locations. Now that the trails in Lusk Creek Wilderness are designated, trails maintenance and trail relocation is occurring.

By 2002 the situation had become critical with the Forest Service being ordered to close natural areas to riding off of designated trails, intense criticism of the condition of the Lusk Creek Wilderness and a pending lawsuit concerning commercial equestrian use of the Forest. An environmental impact statement that considered adding a small number of trails in designated natural areas on the Shawnee had been overturned on appeal. It was in the midst of this controversy that work on the Trails Designation Project began. This project demonstrates the intense commitment that the Shawnee has toward providing equestrian opportunities on the Forest through a well-designed system of sustainable trails.

Nearly 70% of the money that the Shawnee has received for trail work has come in the last 5 years. This funding has been aggressively put to work, first to get additional trails designated and added to the system and, secondly, to begin working on trails in areas where impacts were causing some of the greatest concern. The process of trails designation required several years of preparation and a large commitment of forest personnel and trail money. This effort was necessary to complete the analysis necessary to adequately describe the environmental affects of adding 155 miles of trail to the system.

Since the spring of 2006, when the decision was made to add 155 additional miles of trail to the Forest's designated trail system, work has been ongoing in the Lusk Creek Wilderness to relocate trails out of riparian areas, off of private land and to remove steep trail grades that are prone to erosion. Trails are being surfaced to facilitate all weather use. Regulations within congressionally designated wilderness that preclude the use of motorized tools and mechanized transport have added greatly to the difficulty and expense of the task. The Shawnee continues to be committed to seeing this work completed and we intend to spend much of the 2008 field season completing additional trail work in this area.

Over the past 20 months the Shawnee Trail Crews have been able to complete many miles of trail relocation above Little Bear Branch, around the private land commonly referred to as the Coyote Club, up Barger Branch, near Natural Bridge, through Secret Canyon then north and west to Lusk Creek, north and west of New Liberty Church and from Guest Farm Crossing north toward Saltpeter Cave. A new trail has been constructed connecting County Road 1628 back to Barger Branch. The Wishing Well Trail has been relocated and awaits surfacing prior to being opened for use. Additionally, the promised Lusk Creek Crossings at the Bowed Tree and Blanchard sites have been constructed. Trail relocation projects for 2008 will include portions of Trail 457 (Lusk Creek Trail) between Guest Farm and Bowed Tree Crossing, as well as Trail 001 between Bowed Tree and Owl Bluff (High Point).

Outside of the wilderness, trails have been relocated near Hayes Creek, Jackson Hole and Petticoat Junction. There is a new trail from Frank's Tract to the Lusk Creek Wilderness boundary and trails north of Frank's Tract have been surfaced. Simultaneously, crews on the west side of the Shawnee have relocated the Godwin Trail through the Bald Knob Wilderness and have now completed, with the assistance of volunteers, several trail sections in the Clear Springs Wilderness. Numerous additional trail relocations are being prepared in the Upper Bay, Grand Pierre and Eagle Creek watersheds while we await word on the Shawnee Trails Conservancy/Shawnee NF grant proposal that we have jointly submitted to the Illinois Department of Natural Resources.

In the past two years over 340 trail junction signs have been purchased and installed on the Shawnee National Forest. Trail maps depicting over 200 miles of trails as well as roads, high lines, commercial equestrian camps and points of interest in the Trails Designation Project area have been printed three times. Nearly 8,000 of these maps have been distributed. Other maps of a more localized scope have been available at Shawnee NF offices and on the web for many years.

In the years before the Trails Designation Project brought new miles of trail into the system, the forest worked on the trails that we had designated at that time. Some of the work completed includes sections of trail that were drained and surfaced with gravel including the River to River Trail east and west of High Knob, the River to River trail west of the Lusk Creek Wilderness, sections of trail near Benham Ridge, Miller Grove, Kinkaid Lake, East Branch Loop, Cedar Lake, Gum Ridge and Trigg Tower and on parts of the Beaver Trail at Rim Rock. Trails were relocated or reconstructed near Camp Cadiz, Rock Creek, Inspiration Point and White Pine. Additionally, numerous designated trails were cleared of fallen logs and brush, with drainage structures installed and signs replaced.

In summary, the Shawnee National Forest has been working on trails for many years. In the last five years, as funding has increased and more trails have been designated we have been able to accomplish significantly more work. We are committed to continuing to improve trails and trail riding opportunities in Southern Illinois and are looking at a variety of sources of funding to accomplish this work. The Shawnee would like to implement REA here on this forest as a way to procure a long-term source of funding for better trails and recreation management.

¹ Newsome, D et al., Environmental Impacts Associated with Recreational Horse-riding, *Environmental Impacts of Ecotourism* (ed. R. Buckley) CAB International 2004.

² Marion, J. (2005) Research for Development of Best management Practices to Minimize Horse Trail Impacts on the Hoosier National Forest, USDA Forest Service Research Report