



United States Department of Agriculture  
Forest Service

# Tracy Ridge Shared Use Trails and Forest Plan Amendment Project Environmental Assessment

Bradford Ranger District, Allegheny National Forest, Warren and McKean Counties, Pennsylvania  
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# 1. Purpose and Need for Action

## 1.1 Document Structure

The Forest Service has prepared this Environmental Assessment in compliance with the National Environmental Policy Act (NEPA) and other relevant Federal laws and regulations. This Environmental Assessment discloses the direct, indirect, and cumulative environmental impacts that would result from a proposal to convert 12.5 miles of the 34-mile Tracy Ridge trail system to shared use. The document is organized into three parts:

*Purpose and Need:* This section describes the project area, the purpose and need for the project, and the agency's proposal for achieving that purpose and need. This section also outlines applicable management direction, and details how the Forest Service informed the public of the proposal.

*Comparison of Alternatives, including the Proposed Action:* This section provides a detailed description of the agency's proposed action and other alternatives considered.

*Environmental Consequences:* This section describes the environmental effects of implementing the proposed action and other alternatives. This analysis is organized around analysis issues that were raised during the project scoping period.

## 1.2 Location and Background

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 (see map, Figure 1). The project proposal would convert approximately 12.5 miles of the hiking only trail system to shared use – open to hiking and bicycling.

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.

Currently, the trail system has nearly 34 miles of trails including the North Country Trail which generally runs north to south along the reservoir. In the mid-1990s, the trail system was expanded in two phases. In May 1994, a decision was signed to rehabilitate the existing 16.5 miles of trail and prohibit mountain bike use on Tracy Ridge trails.<sup>2</sup> In fall of 1994, a Forest Order was signed that prohibited bike use on the trail system.

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<sup>1</sup> The enabling legislation is available here:

<http://www.wilderness.net/NWPS/documents/publiclaws/PDF/98-585.pdf>

<sup>2</sup> Prior to the expansion in the mid-1990s, there were three main trail segments in the Tracy Ridge area: the Tracy Ridge Trail (4 miles), the Johnnycake Trail (2.3 miles) and the North Country Trail from Highway 346 to Nelse Run (10.2 miles).

In September 1995, a second decision was signed for the trail system. This decision authorized the construction of 13.6 miles of new trails. This trail mileage included an interpretative trail near the campground. The 1995 decision also authorized the creation of vista areas<sup>3</sup> that would provide recreationists a view of the reservoir.

In 2007, the Allegheny National Forest Land and Resource Management Plan (Forest Plan) was revised. The Forest Plan carried the 1994 Forest Order forward and continued the bike prohibition at Tracy Ridge (Forest Plan p. 31): “Bicycle use is unsuitable on Black Cherry and Tracy Ridge National Recreation Trails.”

In the Forest Plan, Tracy Ridge is in Management Area (MA) 8.2, National Recreation Area (NRA). The MA does not, by definition, prohibit bike use. (A portion of the Tanbark Trail, for example, is in the NRA and allows bikes.) In the most recent forest planning effort, the area was considered for a wilderness study area designation but the decision was to keep MA 8.2 in place at Tracy Ridge. The rationale provided in the 2007 decision explained that the Tracy Ridge area was adequately protected as a NRA and that wilderness designation would limit future recreational opportunities (and other management options).

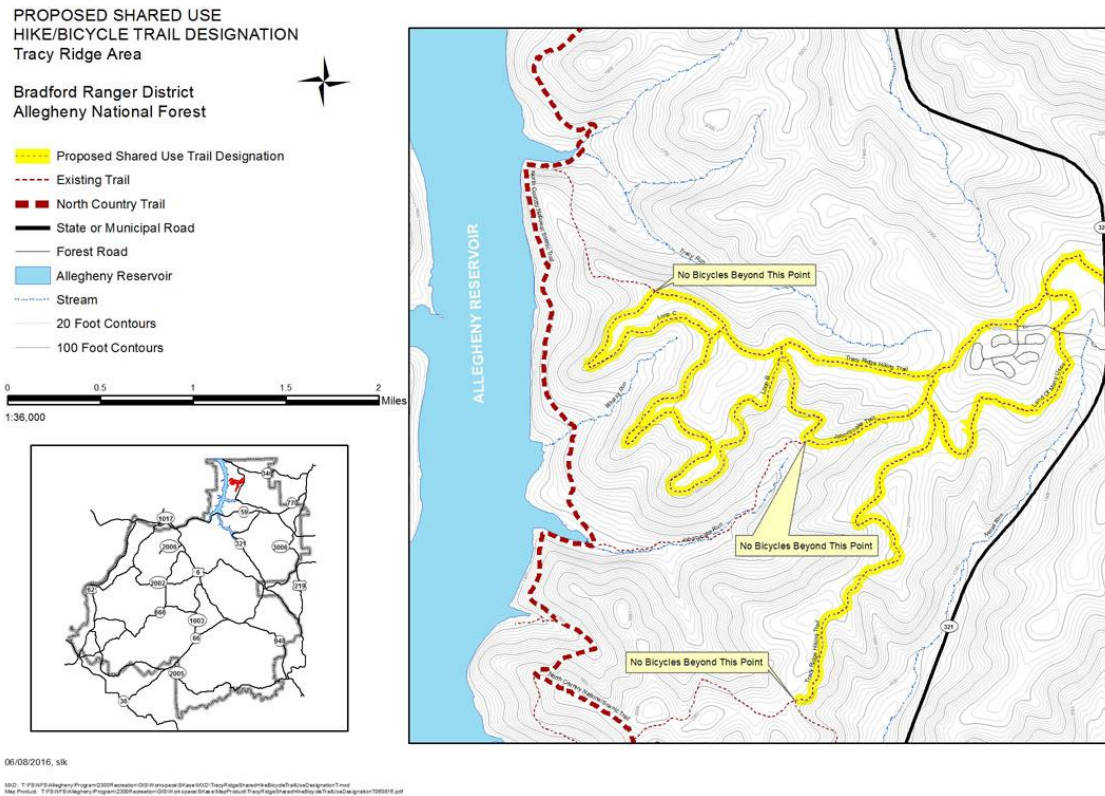
In the 1990s, this area was seen as a magnet for day hiking and backpacking. While the area does host day hiking and backpacking use, the use levels do not seem to support nearly 34-miles of hiking only trails. Today, this trail system is underutilized and minimally maintained. In summer 2015, there were dozens of trees down across the system and, in some places, the trail tread was starting to disappear. The two main legs of the system – the Tracy Ridge Trail and the Johnnycake Trail experience use but the connectors (trails built in the mid-1990s) are seldom used by the hiking public. Likewise, use of the campground is quite low – occupancy of the 100+ site campground is rarely above 10%.

In light of the current maintenance backlog, the increased popularity of mountain biking and the limited high quality biking opportunities on the Forest, it is prudent to re-visit the decision that was made in the 1990s.

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<sup>3</sup> Today, the vista areas (as indicated on maps) do not have views of the reservoir – except during “leaf-off.”





**Figure 1. Vicinity Map**

### 1.3 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.***

As described in Section 1.2, the Tracy Ridge trail system is currently 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, use levels of the trail system are relatively low. Use data gathered this summer and fall 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 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 discussed more in Chapter 3, many mountain bikers are looking for a high quality trail experience that include 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.

## **1.4 Proposed Action**

The following actions are proposed in this project:

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.
2. Change the Trail Management Objectives for these 12.5 miles of trail from Designed Use Hiker Pedestrian, Trail Class 2 to Designed Use Bicycle Use, Trail Class 2.
3. Amend the Forest Plan by removing the bike prohibition on the Tracy Ridge trail (Forest Plan, p. 31). This is a site-specific amendment that does not affect other areas of the Forest.
4. Repeal of a 1994 Forest Order that prohibits bicycle use on Tracy Ridge trails. That order will be replaced with a new order that reflects the shared use proposal. (Bikes will remain prohibited on nearly 22 miles of trails in the area.)

## **1.5 Management Direction**

Currently, the Tracy Ridge trail system is within Forest Plan Management Area (MA) 8.2, National Recreation Area. This MA emphasizes “high quality scenery and recreation experiences for a variety of users. These recreation opportunities help to support the needs of local people and businesses.” (Forest Plan, p. 148) A guideline for trails within this MA allows that “[e]xisting hiking trails may be converted to accommodate non-motorized multiple uses, such as horses, mountain bikes and cross-country skiing.” (Forest Plan, p. 150).

## **1.6 Decision to be Made**

The purpose of this EA is to provide the responsible official with sufficient information and analysis to make an informed decision about the project in response to the purpose and need for action. The responsible official will also consider public input to the EA to decide the following:

- 1) What management activities to select, if any, to help achieve the desired conditions identified in the ANF Forest Plan.
- 2) What site-specific mitigations to select, if any, to minimize environmental effects of any selected management activities.

3) Whether the Proposed Action proposes any significant environmental impacts to warrant the need to prepare an EIS.

The Forest Supervisor for the Allegheny National Forest will be the responsible official for this project. The proposed action also includes a forest plan amendment. Forest plan amendments occur to allow projects or other activities to deviate from certain forest plan direction. A decision on the project is expected by March 2017.

## **1.7 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 meetings 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. This quarterly publication is available on the ANF website. 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.

Using the comments from the public and other agencies, a list of issues to be addressed in this assessment was addressed.

## **1.8 Public Comment and the Development of Analysis Issues**

As stated above, over 250 comments were received on the Tracy Ridge Shared Use Proposal. All of these comments were read carefully and analyzed for "analysis issues" – topics that will be analyzed further in this Environmental Assessment. Seven analysis issues were identified and area listed below.

- How would the shared use proposal at Tracy Ridge affect user conflict and safety concerns on the trail?

- How would the shared use proposal affect the Forest's ability to provide various trail/recreation opportunities?
- How would the shared use trail proposal affect the character and quality of trails at Tracy Ridge, including the long-term maintenance of the trail system?
- How would the shared use trail proposal affect the North Country Trail, including the user experience on the trail?
- How would the shared use proposal affect future suitability for wilderness designation in the Tracy Ridge Recreation Area?
- How would the shared use trail proposal affect the wildlife, native plants and non-native invasive plants in the area?
- How would the shared use trail proposal affect erosion and water quality in the area?

Public comments were also reviewed for potential alternative development; that is, an alternative to achieve the project's purpose and need. No alternatives were identified for this project. (Some comments included minor modifications to the proposed action. These comments are annotated in the project record.)

A number of other comments were received that are considered non-significant. These comments were identified as those outside the scope of the proposed action; already decided by law, regulation, Forest Plan, or other higher level document; irrelevant to the decision to be made; or conjectural and not supported by scientific or factual evidence.

A summary of scoping comments, along with responses, is included in Appendix B to this document.

## **2. Alternatives, Including the Proposed Action**

This chapter describes and compares the alternatives considered for the Tracy Ridge Shared Use Trails Project.

### **2.1 Alternatives Considered but Eliminated from Detailed Study**

Federal agencies are required by NEPA to rigorously explore and objectively evaluate all reasonable alternatives and to briefly discuss the reasons for eliminating any alternatives that were not developed in detail (40 CFR 1502.14).

An alternative was suggested that would amend the Forest Plan to designate the Tracy Ridge area as a wilderness study area. Designation of wilderness study areas is a plan-level decision that is analyzed when a Forest Plan is revised. The Allegheny Forest Plan was last revised in 2007. At that time, a decision was made to include the Tracy Ridge area in Management Area 8.2, National Recreation Area (see ANF Forest Plan Record of Decision, p. 18). In making the decision, the Regional Forester cited several reasons for including Tracy Ridge in Management Area 8.2 (rather than as a wilderness study area). This includes a consideration of the trade-offs associated with a wilderness study area designation and the limitations that it would bring to the Congressionally-designated National Recreation Area.

In addition, this alternative does not meet the stated purpose and need for the project: a need to enhance visitation and maintenance of the Tracy Ridge trail system and a need to increase high quality mountain bike opportunities on the Allegheny National Forest.

Other alternatives suggested utilizing the Forest road system for a mountain bike trail system. Again, this alternative does not address the ongoing maintenance challenges for the Tracy Ridge trail system. It also does not provide a high quality mountain bike experience.

### **2.2 Alternatives Considered in Detail**

#### **2.2.1 Alternative 1. No Action**

In Alternative 1, current management of the Tracy Ridge trail system would continue. Bikes would continue to be prohibited on the trail system. It is expected that use of the system would continue to be relatively low and maintenance would be limited. The current limited trail offerings for mountain bikes would also not change on the Allegheny National Forest.

#### **2.2.2 Alternative 2. Proposed Action**

The Proposed Action would open approximately 12.5 miles of hiking only trails to shared use – trails open to hiking and non-motorized biking. A Forest Plan amendment would be required for this action. The 2007 Allegheny National Forest plan would be amended with following language:

Page 31: modify bullet related to bicycle use to read “Bicycle use is unsuitable on Black Cherry National Recreation Trail.” (Delete “Tracy Ridge” from bullet.)

A Forest Order that prohibits mountain biking use at the Tracy Ridge National Recreation Area will be rescinded.

*Design Criteria included in Alternative 2*

The shared use trail proposal was carefully crafted to keep bikes off of the hiking-only North Country Trail. Trails and maps will be clearly marked with the allowable use and the area will be monitored for compliance.

The Forest Service will also work with local bike clubs to ensure that the trail regulations at Tracy Ridge (and elsewhere) are disseminated to users. One concept discussed with local bike clubs is the development of a “bike ambassador” that will help to educate the bike-riding public and assist with compliance of rules at Tracy Ridge.

## 3. Environmental Consequences

### 3.1 Current trail condition and usage

The Tracy Ridge trail system is located in the Tracy Ridge Recreation Area, an area that includes 34 miles of hiking-only trails, including the North Country Trail (approximately 10 miles of trail). The recreation area is set on a plateau with second growth timber dominated by oak-hickory and northern hardwoods. East of the trail system is the 120-site Tracy Ridge Campground. To the west is the Allegheny Reservoir.

The trail system consists of a number of loops and trail corridors. The Tracy Ridge and Johnnycake trail corridors run east/west and have well-established trail treads (4'-5') and wide vegetation clearing (1'-2').<sup>4</sup> The North Country Trail runs north/south in the western portion of the Tracy Ridge area. There are a number of trail loops between the Tracy Run and Johnnycake Trail corridors. These loops have narrower trail treads and vegetation clearance limits.

The portions of the trail system built before the 1990s (Johnnycake and Tracy Run sections - see photos 1 and 2) have well established trail treads, are relatively flat and have excellent sight lines. The newer loops built in the 1990s, are lightly used and have more significant maintenance needs (see photos 3 and 4).

Currently, the area hosts both day hiking and backpacking. The majority of users utilize the Johnnycake and Tracy Ridge trail corridors. Backpackers use the corridors to access backcountry campsites, "boat-to" campgrounds, and the North Country Trail. Day hikers utilize the system to create hiking loops back to the trailhead.

Recreation staff on the Bradford Ranger District have long characterized use of the trail system as relatively low. This anecdotal sense of trail usage is reinforced by trailhead and trail condition observations (e.g. certain loops in the system have tread conditions that reflect low use.) To validate this observational and anecdotal data, use counts were collected in the summer and fall 2016. Based on this data collection, annual use of the system is estimated at 1,800 to 2,400 visitors a year.<sup>5</sup> Visitor counts during summer and fall of 2016 indicate that use of the system peaks on weekends and can be quite low during the week.<sup>6</sup> Although recorded data from all trailheads on the Forest is not available, observational data suggests that the Tracy Ridge trailhead is less popular than several

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<sup>4</sup> In addition to the trail tread width and the vegetation clearing limits, the majority of the vegetation along the trail is low and the forested environment is fairly open. This all contributes to very good sight lines along the trail.

<sup>5</sup> Use data was estimated from vehicle counts collected at the Tracy Ridge Trailhead (with a TrafX device). The numbers above represent actual numbers collected August-November 2016. December-July use numbers are projected from collected numbers. The range cited above is likely an over count of actual trail use – no attempt was made to separate out drive in/drive out traffic at the trailhead and administrative use.

<sup>6</sup> Counters recorded a number of days in August and September with five or fewer parties accessing the trail system.



other trailheads on the Forest including Morrison,<sup>7</sup> Minister Creek, Jakes Rocks, and Hearts Content.<sup>8</sup>

Currently, the system has a backlog of maintenance needs, including the log out of downed trees, maintenance of drainage structures, brushing and trail tread work.<sup>9</sup> Some sections of the trail would also benefit from short re-routes that would reduce the grade and eliminate unsustainable “fall-line” trail construction. Given higher-use trails and higher priorities, the Forest Service does not have the resources to properly maintain this 34-mile single use trail system. This situation is not likely to change in the foreseeable future.

**Photo 1. Section of trail between markers 1 and 2.<sup>10</sup> Trail tread is quite wide and well-established.**



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<sup>7</sup> During summer 2016, a trail counter was installed at the Morrison Trailhead. Use of the trailhead is quite high, averaging 1,000-1,250 visitors a month during the summer. This number does not reflect actual trail usage as the counter cannot separate out cars that stop at the trailhead to use the restroom, look at the map etc...However, based on observational data, hiking-related parking at the Morrison Trailhead was generally two times that observed at Tracy Ridge.

<sup>8</sup> To put the Tracy Ridge use numbers in context, in October, 2016, an estimated 1500 users utilized the Jakes Rocks trail system. By contrast, the Tracy Ridge trailhead hosted about 400 users. October is considered one of the peak months for trail use at Tracy Ridge.

<sup>9</sup> In 2011, the Forest Service hired a contractor to inventory the condition of the Forest’s non-motorized trails. This effort catalogued the maintenance backlog plaguing the Tracy Ridge trail system.

<sup>10</sup> See Appendix D for locations of trail markers in these photos.



**Photo 2. Section of trail between markers 2 and 15.**



**Photo 3. Section of trail between markers 16 and 13. This section of trail was built in the 1990s and shows minimal use.**





**Photo 4. Section of trail between trail markers 16 and 13. This is a portion of the system that is particularly low-use (based on the condition of trail tread and the amount of tree fall on the trail).**



### **3.2 Environmental Consequences of the Proposed Action and No Action Alternative**

#### **Issues for Analysis**

Scoping comments were used to generate analysis issues. An issue is a point of disagreement, debate or dispute about an environmental impact which has a cause and effect relationship within the Proposed Action. The following seven analysis issues will be discussed in the next section:

1. How would the shared use proposal at Tracy Ridge affect user conflict and safety concerns on the trail?
2. How would the shared use proposal affect the Forest's ability to provide various trail/recreation opportunities?
3. How would the shared use trail proposal affect the character and quality of trails at Tracy Ridge, including the long-term maintenance of the trail system?
4. How would the shared use trail proposal affect the North Country Trail, including the user experience on the trail?
5. How would the shared use proposal affect future suitability for wilderness designation in the Tracy Ridge Recreation Area?
6. How would the shared use trail proposal affect the wildlife, native plants and non-native invasive plants in the area?
7. How would the shared use trail proposal affect erosion and water quality in the area?

*Issue #1- How would the shared use proposal at Tracy Ridge affect user conflict and safety concerns on the trail?*

The issue of user conflict was frequently mentioned in scoping comments. Some commenters stated that mountain biking and hiking are incompatible activities that do not belong on the same trail. Others expressed an opinion that shared use trails can function well and are successfully managed elsewhere. User conflicts are often described as “goal interference attributed to another use group” (Moore 1994). Over the last 20 years, a number of research studies have considered user conflicts between hikers and mountain bikers. Goeft and Alder (2001) provided a literature review for a number of these studies.

Research was reviewed to determine whether specific factors influenced the level of user conflict. In some situations, crowding was suggested as a trigger for user conflict. Horn et al. (1994) (cited in Goeft and Alder), for example, found that most conflicts between mountain bikers and hikers occurred in close proximity to urban areas. While it seems logical that trail design and terrain would also play a role in user conflicts, research into this topic was not found.

There is research that suggests that some hikers report a diminished experience when encountering bikes on trails (Horn et al. 1994 and Bjorkman 1996). Hiker/biker conflicts include “trail displacement, right of way and speed, changed trail experience and environmental impacts” (Bjorkman 1996 cited in Goeff and Alder 2001). By contrast, some studies have shown that hikers cannot always describe what specific bike behaviors impact their experience. Watson et al. (1991) for example, examined user groups in the Rattlesnake National Recreation Area in Montana. While 30-37% of hikers in the study reported that they did not like meeting bicycles on the trail, only about 20% of those respondents could articulate specific bicycle behaviors that interfere with their enjoyment.

The research seems to indicate that user conflict is real but that for hikers and mountain bikers, the conflict may be “asymmetric, or one-sided, which means that one user group resents another user group, which in turn does not reciprocate these sentiments” (Goeff and Alder 2001). Carrothers et al. (1998) (cited in Goeft and Alder) found that the level of conflict was perceived to be higher by hikers towards bikers than what bikers perceived to be the level of conflict. Similarly, Watson et al. (1991) found that hikers, as a user group, reported difference between the two user groups, while mountain bikers tended to report that the two groups were fairly similar. Some researchers have concluded that while mountain bikers are supportive of shared use trails and other user groups, hikers, perhaps because of these perceived differences are less tolerant of other user groups (Goeff and Alder 2001).

Cessford (2003) (Cited in A Survey of Mountain Biking, a review of the Ecological Effects 2010) adds another dimension to this topic. In a survey of hikers on a trail in New Zealand that was recently opened to bikes, hikers that encountered a bike on the trail reported a generally more positive opinion towards bikers than users that did not encounter a bike. It may be that shared use trails may foster better relations between hiking and biking groups compared to segregating the users on separate trails.

On the Allegheny National Forest, there are a few single-track trails that allow shared use: the most prominent of these is the Morrison Trail. While specific bike use numbers are not available, mountain biking on this trail is somewhat limited because of the challenging terrain. While the bicycling use may be somewhat low, the hiking use is quite high. It is likely the most popular hiking trailhead on the Allegheny National Forest. (The use at Morrison is considerably higher than the use at Tracy Ridge.) Despite this high hiking use, there are no known complaints or reports of hiking/bicycling user conflicts on this trail (Mark Conn and Jerry Dixon, USDA Forest Service pers. comm.). Similarly, there are no known incidences of hiking/bicycling accidents or safety issues. Other shared use trails on the Bradford Ranger District, Tanbark and Hearts Content, similarly have no known user conflict or safety reports of negative hiking/bicycling interactions.

Other land managers in the area with shared use trails (including NY State Department of Forestry and Allegany State Park) were contacted for user conflicts/safety issues. None of the agencies reported user conflicts or a concern with the shared use trails (Thomas Livak, Allegany State Park pers. comm. and Daniel Shaffer, N.Y State Department of Conservation, e-mail message to author, September 16, 2016).

### **Alternative 1 – No Action**

In the No Action Alternative, no change is expected in the current level of user conflict. The current level is quite low as the trail is single use and the usage is low-moderate (relative to other trail systems on the Forest).

### **Alternative 2 – Proposed Action**

Introducing another user group to the Tracy Ridge trail system will undoubtedly increase the potential for user conflict on the trail system. The extent and magnitude of this user conflict is difficult (if not impossible) to quantify. Since user conflict is very subjective, it is also a topic that is difficult to describe in a qualitative fashion. There are several factors, though, that would seem to offset and/or mitigate future user conflict. First, use of the trail system is relatively low. Vehicle data collected this summer shows that use peaks on weekends with an average of eight groups per day on Saturdays and Sundays.<sup>11</sup> Many days, though, see less than five groups utilizing the trail system.<sup>12</sup> This fairly low use should help to offset user conflict on the system.

A second factor to consider is the character of the trails. As stated elsewhere, many of the trails have a fairly wide trail tread and the open forested environment allows for good sight lines. This should help to minimize the potential for “surprise” encounters and user conflict.

A third factor is the use pattern of the system. As discussed earlier, the majority of the users utilize the Tracy Ridge and Johnnycake portions of the trail system. These trails have the widest trail tread in the system and tend to have the best sightlines. Along these

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<sup>11</sup> As expected use peaks on holiday weekends, for example, an estimated 18-20 groups utilized the trailhead on Saturday and Sunday during Labor Day Weekend.

<sup>12</sup> During August 2016, there were 14 days in which fewer than 5 groups used the trailhead over the day.



main travel ways, users will only share 2.25 miles of trail (Tracy Ridge Trail) and 1.5 miles (Johnnycake Trail). The remaining portions of the shared use system will include trails that are low use.

Last, trails that allow shared use on the Allegheny National Forest (Morrison, Hearts Content and Tanbark) do not have existing user conflicts, despite the mixing of bicycles and hikers.<sup>13</sup> The Morrison Trail, for example, has an estimated two times more use than that of the Tracy Ridge Trails. The Morrison Trail is also quite a bit steeper and has poorer sightlines than the Tracy Ridge Trails. And yet, mountain bikers and hikers share the trail without incident.

In conclusion, the implementation of a shared use trail proposal at Tracy Ridge would likely increase the potential for user conflict on the trail system. However, several factors including current low usage of the trail, trail character, current user travel patterns and the existing negligible incidence of user conflict on other shared use trails on the Forest would seem to point to a relatively low magnitude of user conflict.

Similarly, the shared use proposal would increase the risk of undesirable hiker/bicycling interactions but the level should be very low. Again, the combination of low use, good sightlines, and a wide trail tread would all help to mitigate safety risk on the trails.

*Issue #2- How would the shared use proposal affect the Forest's ability to provide various trail/recreation opportunities?*

As described in Chapter 1, the Allegheny National Forest Management Plan calls for the trail system “to support a wide variety of recreational opportunities and settings.” Currently, 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.

Table 1 shows the hiking only trails on the Allegheny National Forest. There are nearly 170 miles of hiking-only trails on the Forest.

*Table 1. “Hiking-Only” Trails on the Allegheny National Forest*

<b>Trail Name</b>	<b>Hiking-only miles</b>
Black Cherry Interpretative	2.4
Bullis Hollow	8.3
Hearts Content Scenic	1.2
Hickory Creek Wilderness	12
Minister Creek	10
North Country Scenic Trail	96.3
Rimrock Hiking	1.3
Songbird Sojourn	1.5
Timberdoodle Flats	1.5

<sup>13</sup> There are no known reports of complaints, issues or injuries on the existing shared use trails.

Trail Name	Hiking-only miles
Tionesta Scenic Area	.7
Tracy Ridge	34
Total	169.2

Many of these trails (Bullis Hollow, Hickory Creek, Minister Creek, North Country Trail and Tracy Ridge) offer a remote “backcountry” style of hiking and backpacking. In total, the Forest offers nearly 160 miles of this type of recreation.<sup>14</sup>

By contrast, high-quality mountain bike opportunities are quite limited on the Forest.<sup>1516</sup> As some commenters on the project proposal point out, there are many miles of oil and gas roads and motorized trails available for mountain bikes. However, as studies and surveys have shown, mountain bikers prefer single track trails that emphasize natural settings, variety, flow and trail features such as slope and curve. A study of mountain bikers in Boulder, CO, for example, found that 81% of the riders preferred single track trails for riding (Schulte 2003). Similarly, a 2012 study of mountain bikes on the Loas Padres National Forest reported that users preferred trail qualities that included single track, natural scenery, flow and technicality (Devine, 2012). A survey of mountain bikers in Wisconsin also showed a strong preference for single track trails, natural surroundings, quiet settings and no motorized use (Sumathi and Berard, undated). So although some commenters suggested that there are plenty of forest roads, ATV trails and snowmobile trails to accommodate mountain bike use, research and survey data shows that users are not looking for that type of experience.

Currently, the majority of mountain bike use on the Forest occurs on the Bradford Ranger District. Although there are some trails open to bikes on the Marienville Ranger District (e.g. Twin Lakes, Buzzard Swamp), these trails are not favored by user groups. This low use is likely because the trails do not provide the single track experience favored by mountain bikers. In addition, these trails tend to be in terrain that makes mountain biking very difficult (sharp grades, wet conditions etc.). On the Bradford Ranger District, mountain bike use is focused on four single track trails. These trails are displayed in Table 2. With the exception of Jakes Rocks, these trails tend to get low bike use.

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<sup>14</sup> In addition to the trail opportunities, the ANF Forest Plan has set aside 9,000 acres in Management Area 7.2, Remote Recreation Area.

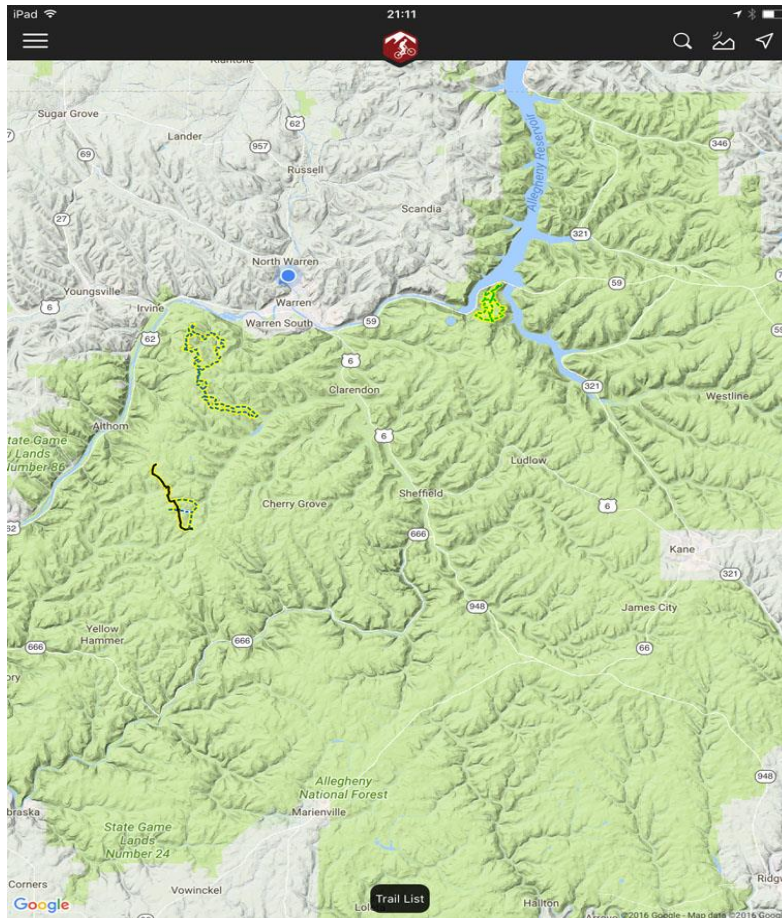
<sup>16</sup> The Final Environmental Impact Statement for the Land and Resource Management Plan states (p. 3-308) that “[t]rue ‘single track’ trail for mountain biking is found on approximately 200 miles of pedestrian hiking trail.” It is unclear as to where this number comes from as the single track trail miles on the Forest is much lower than 200 miles. This figure may refer to the number of single track miles before the 2007 Forest Plan was finalized. The 2007 Plan closed over 100 miles of trail to bikes.

Table 2. Allegheny National Forest – Single Track Trails Utilized by Mountain Bikers

Trail name	Approximate trail miles	Notes
Hearts Content	5 miles	Ski trails open to bikes. Trails are often wet as they follow old railroad/road grades.
Morrison	10.8 miles	Advanced trail – many portions only rideable by expert riders.
Tanbark	7 miles	Portions of the trail are unrideable – particularly a 2-mile section between the Allegheny River and Sandstone Springs.
Jakes Rocks	10 miles	Approximately 45 miles of trails are approved. Funding for full build-out is not yet secured.

MTB Project is an online resource for mountain bike trails. The website/app is designed by Adventure Project, in partnership with REI and the International Mountain Bicycling Association. For the Allegheny National Forest, three trail opportunities are listed: Jakes Rocks, Tanbark/Hearts Content and the Rocky Gap ATV trail. See Figure 2 for a screenshot of the trails listed for the ANF.

Figure 2. Mountain bike opportunities on the Allegheny National Forest (MTB Project)



### **Alternative 1 – No Action**

The Forest’s trail offerings will remain the same: more than 170 miles of trail will remain hiking-only. The Forest will continue to offer a number of remote/backcountry hiking and backpacking opportunities. Mountain bike opportunities, particularly remote/backcountry trail opportunities, will remain very limited.

### **Alternative 2 – Proposed Action**

In the Proposed Action, 12 miles of the more than 170 miles of hiking only trails will be converted to shared use. (This represents less than 7% of the current mileage.) With the implementation of this proposal, 158 miles of trail will remain hiking only, including 22 miles at Tracy Ridge. The Forest will offer an alternative mountain bike trail ride to the Morrison Trail. While only 12 miles, the Tracy Ridge Trails will provide an opportunity for bike users that is very limited across the Forest today.

For day hikers and backpackers, an additional 12 miles of trails will be shared use. Some recreationists will find that the presence of bikes diminishes their recreating experience. For those users, the Forest will continue to offer more 158 miles of hiking-only trails, including the Bullis Hollow Trail (across Highway 321 from Tracy Ridge). Even within Tracy Ridge, hikers and backpackers that wish to avoid bikers can utilize the North Country Trailhead at Sugar Bay. Trail at this trailhead accesses the Tracy Ridge area and the North Country Trail and is hiking-only.

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. Also, the shared use trails at Tracy Ridge will provide a very different riding experience than what Jakes Rocks will offer. Jakes Rocks is primarily a machine-built trail system. Utilizing machines to build trails generally provide users a consistent, smooth tread with a feeling of “flow.”<sup>17</sup> The Tracy Ridge trails, by contrast, are traditional hand-built single track trails that have a rooty/rocky uneven tread. 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. The trail system is also adjacent to the Tracy Ridge Campground and would provide additional incentive to utilize the campground. Also, much of Jakes Rocks trails will be in close proximity to the road system – the current 10 miles, for example, are all within ¾ mile of a road. The Tracy Ridge trails, by contrast, provide a much more remote, “backcountry” feel. This riding experience will be quite different than what is offered at Jakes Rocks.

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<sup>17</sup> “Flow” trails are also typically enhanced with machine-built or natural features that optimize the trail for bike use.

*Issue #3 - How would the shared use trail proposal affect the character and quality of trails at Tracy Ridge?*

Currently, the Tracy Ridge trail system consists of hand-built, native surface trails. Trail structures (e.g. water bars) are present but not prevalent in the trail system. The trails are classified as Trail Class 2. Class 2 trails have a tread that is discernible and continuous, but narrow and rough. There are some allowances for passing and native materials are utilized for construction and maintenance. The Tracy Ridge trails vary in width but are generally 4-5' wide. The trail is wider along the Tracy Ridge and Johnnycake trail corridors. (The trails follow an old road corridor.)<sup>18</sup> The grade is mostly gentle as much of the trail system is on a plateau.

Historically, maintenance of the trail system has been quite limited. A combination of limited trail budgets and relatively low use has prioritized other systems above the Tracy Ridge trail system. Currently, there are no organized groups that provide maintenance of the system. When this project was first considered in 2015, the trail system was in considerable disrepair. Trail signs were missing and dozens of trees had fallen across the trails. There are some ad hoc individuals that provide volunteer support (e.g. during the spring and summer of 2016, a volunteer assisted with replacing missing signs.). Overall, though, the trails are in need of maintenance. Throughout the system, a number of trees remain across the trail tread. Drainage structures installed in the 1990s need to be updated and/or replaced.

#### **Alternative 1 – No Action**

It is expected that the maintenance of the system will continue to be limited. Occasionally, volunteers will provide some of the basic maintenance needed to keep the system usable. Given the relatively low use of the area and the limited Forest Service maintenance budget, there is no expectation that scheduled trail maintenance will change for the system. It is expected that the trails will continue to brush in and that the trail tread, in some places, will eventually become indistinct and difficult to follow.

#### **Alternative 2 – Proposed Action**

Opening up 12 miles of the trail system is expected to increase use and opportunities for volunteer trail maintenance. Presently, the Forest Service does not have the resources to manage the 34-mile trail system at Tracy Ridge. While the local NCTA Chapter maintains the North Country Trail portion of the trail system (10 miles), nearly 24 miles of trail are not regularly maintained. Given the relatively low use of the system, it is not likely that the Forest Service will ever prioritize routine maintenance of this system. Without new users and stewards, the trail system will continue to fall into disrepair as more trees block the trails, the tread becomes more difficult to follow and unaddressed drainage issues become worse. The Proposed Action provides an opportunity for an infusion of new users and stewards as local bike clubs have offered to assist with trail maintenance in the future.

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<sup>18</sup> The trail tread for the “new” loops – built in the 1990s – tends to be a bit narrower – generally 3-4' wide.



Although some commenters on the shared use trail proposal suggested that significant upgrades (e.g. hardening of trails, rocking etc...) would be needed to open the system to bikes, this is not true. Although the trails do need basic maintenance (needed regardless of the shared use proposal), there is no need for additional development on the trails. Trails on the Bradford Ranger District that share hiking and biking (e.g. Morrison Trail and Tanbark Trail) do not have the hardening and development features suggested by some commenters. These trails do not show any additional wear from bikes.<sup>19</sup>

Overall, then, the shared use trail proposal is not expected to change the character and quality of the Tracy Ridge trails.

#### *Issue #4 - How would the shared use trail proposal affect the North Country Trail?*

The North Country National Scenic Trail (NCT) is an approximately 4,600 mile trail that extends from New York to North Dakota. Portions of the trail system allow shared use (hiking, biking and/or horseback riding). Approximately 100 miles of the trail cross the Allegheny National Forest. The entire section is open to hikers only. (This project does not propose to change the hiking-only nature of the NCT on the Allegheny National Forest.)

Approximately 10 miles of the NCT pass through the Tracy Ridge Recreation Area. The trails runs from the north at Willow Bay to the south at Sugar Bay, generally staying to the western portion of the recreation area.

Anecdotal trip reports and guide book narratives suggest that this section of trail is highly valued by the backpacking and hiking public. This section of the NCT is valued for its remote/backcountry feel and its scenic attributes. (Much of the trail runs adjacent to the Allegheny Reservoir.)

Some commenters on the shared use proposal suggest that mountain bike trespass is already an issue on the Allegheny National Forest and that this proposal will exacerbate the issue on the portion of the NCT at Tracy Ridge. Mountain bike trespass, however, does not seem to be an issue on the Forest. Anecdotal reports of bike usage on prohibited trails (e.g. NCT, Tracy Ridge, Minister Creek, Bullis Hollow, Hickory Creek Wilderness) are very few. Recreation staff on the Forest are aware of very few bike trespass reports (Mark Conn and Jerry Dixon, USDA Forest Service recreation staff, pers. comm).

#### **Alternative 1 – No Action**

Under the No Action Alternative, bike trespass on to the North Country Trail through Tracy Ridge is expected to remain very low. Currently, there are occasional reports of bikes use on the NCT.

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<sup>19</sup> Some comments suggested that trails that allow bikes naturally degrade to a “v” shaped tread. Trails on the Allegheny NF that allow bikes show no evidence of this trail deterioration.



Similarly, users of this section of the NCT would experience no change to their current experience on the trail.

### **Alternative 2 – Proposed Action**

The shared use trail proposal would increase the potential for bike trespass on to the NCT. Although the trail is buffered by one-mile or more “no bike zones,” the potential remains for bikes utilizing the NCT. This potential, though, is mitigated by several factors. First, a package of design criteria are identified for this project, including signage, education and close coordination with local bike clubs. Also, the terrain of the NCT through Tracy Ridge is a limiting factor for bike trespass. Portions of the trail are steep, excessively rocky and, presumably, quite undesirable for most bike users. Some commenters suggested that the draw of the reservoir will be too enticing for mountain bikers and that users will ignore closure areas. Trails beyond the shared use sections of Tracy Ridge, though, are quite steep and not easily rideable by the casual mountain biker. For example, beyond the shared use portion of the Tracy Ridge Trail corridor the elevation drops 600’ in 1 mile. This rocky, exceedingly steep descent (or ascent) is not likely to be a draw for many mountain bikers who choose to ignore the signage.

Overall, it is believed that the combination of trail buffers, signage, education and the condition of the NCT will minimize the potential for bike trespass on to the NCT.

With the shared use trail proposal, users wishing to access the NCT from Tracy Ridge may experience interactions with mountain bikes as they hike out of the trailhead. Hikers utilizing the Tracy Ridge Trail for their hike or backpack will share the trail with mountain bikers for approximately 2.25 miles. Hikers accessing the NCT via the Johnnycake Trail will share the trail with bikes for approximately 1.5 miles. While encounters with bikes are possible, and during peak usage likely, the limited shared use trail miles will limit interactions. Users that wish to avoid bikes altogether can access the NCT from the Sugar Bay Trailhead (approximately five miles south of the Tracy Ridge Trailhead). These hikers and backpackers can hike to the NCT without utilizing any shared use trails.

#### *Issue #5 - How would the shared use proposal affect future suitability for wilderness designation in the Tracy Ridge Recreation Area?<sup>20</sup>*

Some comments suggested that converting 12.5 miles of the 34 mile Tracy Ridge trail system to shared use would rule out the area’s future potential for wilderness designation. As stated elsewhere in this document, the Tracy Ridge area is designated as a National Recreation Area. The Forest Service is not tasked with providing a wilderness-type experience in the area. Again, as discussed elsewhere, only Congress can designate wilderness. This section will briefly highlight the factors considered in a wilderness designation and the effect, if any, a shared use proposal will have on these factors.

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<sup>20</sup> This section is provided to address some comments received during the scoping period. Under current management plans for the Tracy Ridge area, the Forest Service has no direction that mandates the area be managed consistent with wilderness objectives. Currently, the area is managed as a National Recreation Area, consistent with Public Law 98-585 and the Allegheny National Forest Land and Resource Management Plan.

The agency looks at several factors when recommending an area for inclusion in the National Wilderness Preservation System. These factors include natural integrity and appearance; opportunities for solitude, challenge and primitive recreation; size, shape and manageability; and special features. Voluminous information is available on each of these factors; the intent of this section is not to define each factor and provide a thorough analysis of current conditions at Tracy Ridge. Rather, this section seeks to answer the question: would a shared use trail limit the ability of the Tracy Ridge area to be designated wilderness by Congress?

### **Alternative 1 – No Action**

Under the No Action, there would be no change to the existing characteristics of the area.

### **Alternative 2 – Proposed Action**

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 existing trail network is not expected to change from the conversion. Contrary to some comments, allowing bikes on trails does not require extensive modification, “shoring-up,” or other such development. 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.<sup>21</sup> Any impacts related to solitude and primitive recreation would immediately disappear upon designation of the area as wilderness by Congress. There is no evidence that shared use would degrade any of the “special features” identified for the area – including mature forest, wildlife, and historic sites. Furthermore, evidence suggests that Congress will designate Wilderness despite the presence of trails that allow bikes. For example, in 2015, the Boulder-White Cloud Wilderness was designated by Congress. Within the new Wilderness, more than 50 miles of trails previously open to bikes were closed to bikes. In this case, the presence of shared use trails did not limit the area’s designation as wilderness. Overall, no evidence was provided during public scoping that shared use trails at Tracy Ridge will adversely impact any future wilderness considerations for the area.<sup>22</sup>

### *Issue #6 - How would the shared use trail proposal affect the wildlife, native plants and nonnative invasive plants in the area?*

Some comments stated that the Forest Service should consider impacts to wildlife/native plants in the environmental analysis. No site-specific information or species-specific concerns were raised in scoping comments.

For vegetation, current condition of the understory along the trail is sparse vegetation with only occasional herbaceous or shrub components. Native plants in this area are those typically found in an oak forest type and there are no Regional Forester Sensitive Species known to occur along the existing trails. Non-native invasive plants in the area include

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<sup>21</sup> Trail condition is not likely a factor in wilderness designation. Wilderness designations have occurred in areas with very heavy trail use and the impacts that typically come with heavy trail use.

<sup>22</sup> Again, it is emphasized that there is no standard or regulation that directs the Forest Service to ensure the future wilderness suitability of the area.

multiflora rose (*Rosa multiflora*), non-native bush honeysuckles (*Lonicera spp.*), and autumn olive (*Elaeagnus umbellata*).

For wildlife, a Biological Evaluation/Assessment was prepared for the project. The area contains habitat for a number of Forest Service sensitive species including Bald eagle, Northern goshawk, Northern flying squirrel and a number of bat species.

### **Alternative 1 – No Action**

In the No Action Alternative, no change is expected in the current level of impact to wildlife, native plants and non-native invasive plants in the area.

### **Alternative 2 – Proposed Action**

#### *Native Plants and Non-Native Invasive Plants*

As described previously, the Tracy Ridge and Johnnycake trail corridors already have well established trail treads (4'-5') wide. Because no overstory vegetation clearing to increase trail width is proposed, the site conditions along the trail (which consist of mostly low light due to a closed overstory forest canopy which precludes the growth of most native and non-native invasive plants) will persist. The small amount of forbs, grasses, and sedges that occur adjacent to the trail will be disturbed if bikes utilize the outer edges of the trail template. The native plant species along the trail are represented elsewhere in the ANF. The non-native invasive plant species found within the area are mostly bird-dispersed and are not anticipated to increase due to bike traffic on the trails. If, however, other species such as Japanese stiltgrass (*Microstegium vimineum*) – a species easily dispersed by humans – are found within the area, it will be treated accordingly.

#### *Wildlife*

There will be no ground disturbing activities associated with the proposed action; therefore no loss, fragmentation, or alteration of habitat would occur. Although mountain bikers using the trail could temporarily flush wildlife immediately adjacent to the trail, the impacts are expected to be negligible to Regional Forester Sensitive Species (RFSS). This is due to the fact that the trail system already experiences foot traffic from hikers, human presence from camping already occurs near the trail, and any potential wildlife displacement from mountain bikers is expected to be of very short duration and extremely sporadic. The nature of the potential displacement from mountain bikers is not expected to impact breeding success and foraging behavior. If cumulative impacts to RFSS from the recreational use within the analysis area transpires in more impacts than expected, Forest Plan standards and guidelines would be implemented (page 81) to reduce impacts.

Since impacts to the northern long-eared bat, little brown myotis, tri-colored bat, and northern goshawk from the proposed project would be negligible, a “no effect” determination is reached for the northern long-eared bat and “no impact” determination is reached for the RFSS species.

A complete Biological Evaluation/Assessment has been prepared for the project and is available in the project record.

*Issue #7 - How would the shared use trail proposal affect soil productivity and water quality in the area?*

A number of comments were received that suggested that opening up trails to mountain bikes will lead to erosion issues. Generally, these comments were fairly general and did not include site-specific information. As with other issue statements, research was reviewed to determine if studies support the comments received during the scoping period. Overall, research does not indicate that mountain bike use necessarily results in trail damage, including erosion. For example, Wilson and Seney (1994) found no significant difference between hiking and bicycling effects. Indeed, this study found that horses and hikers creates more erosive potential than wheeled forms of recreation. Similarly, Goeft and Alder (2001) did not find clear erosion trends in hiking or bicycling use. The study suggests that user groups are less a factor for erosion than slope, soil drainage, and age of the trail.

Pickering et al. (2009) reviewed literature comparing the impacts of hiking, bicycling and horse use on vegetation and soils. According to Pickering, some of the existing research, including research listed above, contains methodological issues that may limit the application of the research to conditions on the ground. Overall, the Pickering literature review found that “biophysical impacts from hiking are better researched than from horse riding and mountain biking ... For mountain biking it is hard to assess relative impacts as there is little research ...”

A report compiled for Parks Canada (Mountain Biking: A Review of Ecological Effects) reflects many of the findings in the studies referenced above. In addition to the factors listed above, this report cited research that indicated that cycling techniques (cutting switchbacks, excessive skidding and braking) might also play a role in erosion.

Although there is published research that examined the effects of outdoor recreation use on water quality, the report prepared for Parks Canada did not find any published research specific to bikes and water quality.

## **Analysis Framework**

### *Affected Watersheds*

Watersheds and subwatersheds affected by shared use trails are presented in Table 3. These watersheds are all located upstream from the Kinzua Dam so the entire project area drains into the Allegheny Reservoir.

**Table 3:** Watershed hierarchy for the Tracy Ridge project area

<b>4<sup>th</sup> level subbasin</b>	<b>5<sup>th</sup> level watershed</b>	<b>6<sup>th</sup> level subwatershed</b>
Upper Allegheny River	Upper Allegheny Reservoir	Allegheny Reservoir (Upper)

### *Affected Soils*

Soil considerations for soil disturbance are focused on erosion concerns due to steep slopes and soil drainage associated with poorly drained and moderately well drained soils. This project area is made up primarily of well-drained soils. Since this project will not impact undisturbed soils, the effects to soils will be discussed in terms of maintenance needs and the disturbance of soils expected from the use of mountain bikes.

### *Affected Streams and Wet Areas*

The perennial streams in the project area include Tracy Run and Johnnycake Run and their associated tributaries. These streams are also referred to as “blue line” streams because they appear as a broken or solid blue line on a USGS topographic map.

Protected water uses have been designated by the PA Department of Environmental Protection (DEP) for all Commonwealth waters, and all of the blue line streams in the project area are designated as High Quality - Cold Water Fish (HQ-CWF) streams. These streams should be managed in a way that maintains and/or propagates fish species as well as flora and fauna, which are indigenous to a cold-water habitat and the water quality shall be maintained and protected. Most of these streams support a reproducing population of native brook trout. No streams within the cumulative effects analysis area are listed as “water quality limited” by DEP based on the latest 303(d) listing of stream channels impaired from meeting Commonwealth water quality standards. Based on DEP review, water quality in all streams within the analysis area meets all Commonwealth standards and all protected uses.

### *Cumulative Effects Analysis Area for Hydrology and Soils*

The cumulative effects analysis area for the Tracy Ridge project is composed of the Allegheny Reservoir (upper) subwatershed because ground disturbing activities within these subwatersheds have the potential to contribute to cumulative increases in overland flow, sediment delivery to streams, and alteration of wetland hydrology.

#### **Alternative 1 – No Action**

In this alternative, trail use is expected to remain constant and bikes would not be allowed. No change is expected to soil productivity or water quality. Any trail erosion problems that exist would continue to erode until maintenance is performed.

#### **Alternative 2 – Proposed Action**

Given that the soils on this trail are currently disturbed and compacted because they have been used for hiking for more than 20 years, soil disturbance is not expected to have a detrimental increase. Soil disturbance may increase to some degree in this project area depending on level of the increased use of trails. Mountain bikes may cause some soil erosion when they use excessive skidding or when they make sharp turns. Mountain bikers are expected to stay on the trail corridor because it is the easiest path to travel, but they may cause trail widening on sharp turns or switchbacks. Performing maintenance on the trails will keep erosion to a minimum. For example, rolling dips and other water

diversions divert water to the forest floor where it can infiltrate instead of flowing down the trail and eroding soil.

This trail is located on well drained soils and does not cross many areas with perennial water. The trail has two crossing of intermittent streams that are well armored with rock to prevent erosion. The trail also has a perennial stream crossing of Johnnycake Run that is located on an old road bed. This crossing will not be affected by mountain bikes.

As with any trail system, the potential for increased sediment delivery resulting from regular use depends on frequent monitoring, maintenance, and repair if problem areas develop on trail surfaces. Currently there are areas of the Tracy Ridge trail system that are eroding and possibly contributing sediment to water courses. Given the research described earlier in this section, mountain bikers are not expected to exacerbate existing trail issues. Protection of water resources would be accomplished by controlling erosion and runoff from trails, particularly at stream and wetland crossings. Water diversion features such as rolling dips and lead-offs divert water off the trail where sediment would be filtered before overland flow can reach streams. The introduction of additional volunteers into the system may increase the likelihood of improved maintenance or construction of these water diversion features.

### ***Monitoring***

The implementation and effectiveness of best management practices (including Forest Plan standards and guidelines) for trails may be monitored within the project area to ensure protection of water quality or water quantity. This monitoring would be focused where activities overlap riparian corridors or are located adjacent to riparian corridors.

*Cumulative Effects: Are there any past, present or future activities that may contribute to cumulative effects with this project?*

While this document considers the direct and indirect effects related to the proposed shared use trails proposal, the Forest Service is also required to determine whether the effects of past, present and future activities, when added to the proposed activity may create a cumulative effect – an effect above and beyond the direct and indirect effects. The only activity that is relevant to the Tracy Ridge Shared Use Trail Proposal is the ongoing trail development at Jakes Rocks. As trail development continues, it would seem likely that additional mountain bikers would visit the area and seek out trail experiences that complement the Jakes Rocks trails. The combination of increased use at Jakes Rocks with new trail opportunities at Tracy Ridge may increase use of the shared use trails (above what would be typically expected). It is very difficult, if not impossible, to project this increased use at Tracy Ridge (or elsewhere on the Allegheny National Forest). It is reasonable, though, to expect that increased use at Jakes Rocks will increase usage of any trails open to shared use at Tracy Ridge. Even with increased use, cumulative effects above and beyond the direct and indirect effects disclosed in the Environmental Assessment are not expected.



Specific to hydrology, the shared use of these trails with mountain bikes and hikers would not contribute to any cumulative increase in soil disturbance or impacts to water quality at individual streams and wetlands because:

- no oil and gas development has occurred and none is expected in the project area, so no contribution to any cumulative effect could occur from this activity;
- no other activities are proposed in this area.

Because the proposed action is not likely to increase sediment delivery to streams, and ANF Forest Plan standards and guidelines would reduce the likelihood of any measurable increase in sediment delivery to streams or wetlands, in or outside of the project area, no contribution to a cumulative effect to water quality would be expected.

No adverse cumulative effects are anticipated for this project.

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## Appendix B – Response to scoping comments

This project proposal was scoped from July 18-August 16, 2016. Over 250 comments were received on the proposal. All comments were read and logged into an Excel spreadsheet. In three ways, these comments were used to build this Environmental Assessment. First, comments were reviewed to determine whether there was an alternative means to meet the identified purpose and need for the project. Also, comments were used to both develop mitigation measures for the proposed action and to identify analysis issues which are discussed further in the EA. The table below summarizes the major themes contained in the comments. As mentioned above, some comments were used to develop analysis issues. Others were outside the scope of the project; already decided by law, regulation or policy; or were conjectural and not supported by scientific or factual evidence. Comments below are summarized from comment letters.

Comment Number	Comment	Response
1	FAW [Friends of Allegheny Wilderness] and our supporters are happy to endorse the Jake’s Rocks Mountain Bike Trail Project. Having a high--quality, appropriately designed and engineered, environmentally--friendly destination built specifically to withstand the rigors of bicycling will benefit the mountain biking community greatly, and can contribute to helping alleviate the problem of illegal mountain bike trespass elsewhere in the ANF where the use is not allowed – such as within designated and proposed wilderness.	As discussed in the EA, there is no known “problem” of illegal mountain bike trespass on the Allegheny National Forest. The District is unaware of documented occurrences of bike incursions into the wilderness. For wilderness study areas (e.g. Minister Creek), there are very few known occurrences of bike use. This topic is also discussed in the EA under Issue #4 – <i>How would the shared use trail proposal affect the North Country Trail?</i>
2	An Environmental Impact Statement (EIS) should be prepared for this project. The legislation for the National Recreation Area requires that an EIS is prepared for the initial management plan and significant amendments.	Under the National Environmental Policy Act (NEPA), an Environmental Assessment may be prepared to analyze and disclose the effects of a particular action. If the Environmental Assessment finds a “Finding of No Significant Impact,” (FONSI) an EIS is not required. In NEPA, a “significant impact” has a very specific meaning. A number of factors are considered when determining impact including context and intensity. The project is run through several screens, including impacts to wetlands, structures on the National Register, critical habitat, public safety etc... There is nothing in the 1984 enabling legislation that mandates the preparation of an Environmental Impact Statement. A FONSI (included with this EA) was determined for this project proposal. An EIS for this project is not necessary.

Comment Number	Comment	Response
3	The Forest Service did not adequately consider other alternatives for expanding mountain bike use on the Forest.	The proposed action does not only address the paucity of high quality mountain bike opportunities on the Forest. It also addresses the low use and maintenance needs for the Tracy Ridge trail system. The project seeks to leverage the volunteer ability of a new user group – mountain bikers – to both utilize the trail system and help maintain the trails.
4	Opening the Tracy Ridge Trails to mountain bikes will provide a new user group that can help to maintain the trails.	This topic is discussed further in Analysis Issue #3 <i>How would the shared use trail proposal affect the character and quality of trails at Tracy Ridge, including the long-term maintenance of the trail system?</i>
5	The Forest Service fabricated claims that the Tracy Ridge Trails are underutilized. The trails are “well-used and widely popular.”	Terms such as “underutilized” and “widely popular” are qualitative, not quantitative. It is the professional opinion of the Bradford Ranger District that the trails are lightly used, particularly relative to the 34-miles of hiking-only trails available. This contention is reinforced by on-the-ground observation and data collection. The underutilized statement is also relative to other trail systems that are quite popular on the District – including systems at Morrison and Minister Creek. This topic is discussed further in Chapter 3 of this EA.
6	Opening Tracy Ridge Trails to mountain bikes will provide an additional infusion of recreation-related revenue to the area.	A number of studies have shown that providing mountain biking opportunities can provide economic benefits to an area (Boozer 2012, Sumatha, and Berard undated ). However, in this case, it would be very difficult to analyze the additive impact of 12 miles of mountain bike trails to the region’s economy. While there may be an economic benefit, the topic is not analyzed in detail in this EA,
7	This proposal is unnecessary – the Forest Service already has a number of mountain bike opportunities available to the public.	This topic is discussed further in Analysis Issue #2 – <i>How would the shared use proposal affect the Forest’s ability to provide various trail/recreation opportunities?</i>
8	The Tracy Ridge proposal is a balanced approach that will provide a single track backcountry riding experience that is currently not available on the Forest.	This topic is discussed further in Analysis Issue #2 – <i>How would the shared use proposal affect the Forest’s ability to provide various trail/recreation opportunities?</i>
9	The Forest Service should not reverse a decision made in 1994 that closed the Tracy Ridge Trails to bicycles. This decision discussed user conflicts and erosion as primary factors in ordering this closure.	The 1994 decision was made more than 20 years ago. At the time, there was limited knowledge of mountain bike impacts on trails. In addition, recreation trends have changed since the 1990s. Mountain biking is an acceptable and appropriate use of public lands.

Comment Number	Comment	Response
		<p>Specific to the decision to close the trail to bikes, the May 1994 Decision Memo included a short rationale for the bike prohibition: “The soils and topographic conditions of the area would not support equestrian and mountain bike use.” The rationale continues “I also believe that adding equestrian and mountain bike use to the existing system would increase the number of user contacts, which in turn, would adversely effect (sic) the Recreation Opportunity Spectrum, (ROS), class of semi-primitive non-motorized, (SPNM).”<sup>23</sup></p> <p>No analysis has been found to substantiate these statements. Indeed, field notes on the Tracy Ridge Trail (from the “Tracy Ridge Recreation Concept Analysis”) state that “ground is stable and little erosion is taking place.” Notes on the Johnnycake section of trail indicate potential issues; however, the 1994 decision included re-routes and erosion control measures that would help ameliorate future problems.</p> <p>Interestingly, the 1995 decision states that the 13.6 miles of new trail will be located “on a rolling plateau with few, if any streams and seeps. Slopes range from 5-10% and soils are generally well drained” and it was anticipated that there would be “little expected resource disturbance.”</p> <p>The rationale for the closure in the 1990s is not well-documented in the project record.</p>
10	The enabling legislation for the Allegheny National Recreation Area (NRA) does not prohibit the use of bikes in the NRA nor does the Forest Service Management Plan designation (8.2) prohibit this use.	The current management situation for the Tracy Ridge area is summarized in Section 1.2 Location and Background.
11	The Tracy Ridge area should be protected as wilderness or designated as a wilderness study area.	A number of comment were received that stated the Tracy Ridge Recreation Area should be designated as wilderness. These comments are outside the scope of the project. Only Congress can designate wilderness. While the Forest Service can designate an area as a wilderness study area (WSA), there is some discretion that comes with that designation. Forest Service Handbook 1901.12 Chapter 70 describes the steps needed to designate an area as a WSA. The WSA evaluation process typically occurs during the land management planning process (e.g. Forest Plan revision). The

<sup>23</sup> Forest Service Decision Memo “NRA Trail Project Phase I,” signed June 10, 1994.

Comment Number	Comment	Response
		Handbook describes a number of criteria that should be considered in a WSA recommendation and clearly states that there is no requirement that all evaluated areas get carried forward as recommendations for inclusion in the National Wilderness Preservation System (FSH 1901.12, Chapter 72). The Handbook further directs the agency to document the rationale for decisions (FSH 1901.12, Chapter 74). As stated in the Allegheny National Forest Management Plan (2007), the decision was made by the Regional Forester to not include Tracy Ridge as a WSA. The rationale for this decision was provided in the Plan's Record of Decision on page 18. It is beyond the scope of this planning project to re-visit that decision.
12	If mountain biking is allowed in the Tracy Ridge area, wilderness designation would be much more difficult.	This statement is conjectural. Recent wilderness proposals (including the 2015 designation of the Boulder-White Cloud Wilderness in Idaho) have removed mountain bikes from trails within the newly established wilderness area. Ultimately, only Congress can designate wilderness and it is conjectural to state that allowing bikes on Tracy Ridge trails will impact the area's potential for wilderness designation. This issue is additionally discussed in Issue #5: <i>How would the shared use proposal affect future suitability for wilderness designation in the Tracy Ridge Recreation Area?</i>
13	The Forest has nearly 170-miles of hiking only trails. This proposal meets the changing needs of visitors and the Forest.	This topic is discussed further in Analysis Issue #2 – <i>How would the shared use proposal affect the Forest's ability to provide various trail/recreation opportunities?</i>
14	If the shared use trails proposal is approved, there will be “perpetual” mountain bike trespass on the North Country Trail.	This topic is discussed further in Analysis Issue #4 – <i>How would the shared use trail proposal affect the North Country Trail, including the user experience on the trail?</i>
15	In the environmental analysis, the Forest Service should consider the impacts to wildlife.	This topic is discussed further in Analysis Issue #5 - <i>How would the shared use trail proposal affect the wildlife, native plants and non-native invasive plants in the area?</i>
16	Because of the potential for e-bikes on non-motorized trails, bikes should not be allowed on trails at Tracy Ridge.	The Forest Service has issued a briefing paper that clarifies agency direction on e-bikes. Currently, e-bikes are considered a motorized vehicle and, therefore, prohibited on non-motorized trails. While it is true that it is somewhat difficult to distinguish e-bikes from mechanized mountain bikes, the suggestion that all bikes should be prohibited from non-motorized trails because of e-bikes using the trail is not tenable or realistic.
17	Allowing shared use of the Tracy Ridge Trails will jeopardize public safety.	This topic is discussed further in Analysis Issue #1 – <i>How would the shared use proposal at Tracy Ridge affect user conflict and safety concerns on the trail?</i>



Comment Number	Comment	Response
18	Because of low use, the Forest Service should close three loops in the Tracy Ridge Campground as this will increase the integrity of the proposed wilderness.	The Forest Service’s Recreation Site Analysis (RSA) will evaluate and recommend the best approach for the Tracy Ridge Campground. This process considers a number of factors including economic, social and environmental. Also, there is a public component process in the RSA evaluation. As stated elsewhere, there is no Forest Service proposal that includes a recommendation for wilderness designation at Tracy Ridge. The area is currently designated as a National Recreation Area.
19	To help minimize the impact of bikes on the trail and the likelihood of trespass on to the NCT, the Forest Service should consider a number of mitigations, including a shared use trail period, structures on the trail that limit bike access and the setting of a limit of acceptable change.	In Chapter 2 of this EA, there is a discussion of design features for the project. Some of the suggested mitigations (e.g. physical bike barriers on the trail) are not included in the proposed action as they are not practical or needed to offset environmental impacts. Although suggested by commenters, a “trial period” is also not included in the proposal. It is unclear as to how this trial would be implemented and how a threshold would be set that would remove bikes from the trails. As described in the analysis, widespread bike trespass and damage is not expected from this proposal.
20	Mountain bikers have a reputation as good trail stewards that give back to the trails that they utilize.	As described in the EA, mountain bike clubs are a valuable partner to the Forest Service. These groups routinely contribute volunteer time to assist with the maintenance and construction of non-motorized trails.
21	Many of the trails at Tracy Ridge are soggy and highly susceptible to mountain bike damage.	This comment does not reflect observations of the trail system, including observations after rain events. Generally, the trail generally sheds water quickly and drains well.
22	Current plans to build trails at Jakes Rocks will more than satisfy the need for additional mountain biking opportunities on the ANF.	This comment is addressed in Analysis Issue #2.
23	A number of comments made suggestions and/or asked how the agency is going to enforce the no bike portions of the Tracy Ridge trail system.	It is believed that the combination of education and signage will help ensure compliance with the no bike portions of the Tracy Ridge trail system (including the North Country Trail). Currently, the ANF has very little signage and invests minimal time educating the bike-riding public as to the trails that allow bike use and the proper protocol to follow when encountering hikers. Yet, there is a very low incidence of bike trespass on ANF trails. (Despite already having shared use trails in close proximity to trails that prohibit bike use.) It is not clear why some commenters feel this is going to change if shared use is introduced at Tracy Ridge.  Furthermore, the concept of including shared use trails in relative close proximity to the North Country Trail is consistent with management of the trail elsewhere. Indeed, some

Comment Number	Comment	Response
		portions of the NCT allow mountain biking. In the Manistee National Forest, for example, no bike portions of the NCT are separated from bike-allowable sections by only a paved road. Similarly, in Moraine State Park, the NCT is intersected by a shared use trail. The Tracy Ridge proposal includes mitigations (e.g. separating the NCT from shared use trails by at least a mile trail buffer) that is above and beyond that in other areas.
24	Some comments remarked that the Tracy Ridge is an inventoried roadless area and, therefore, the proposal was inappropriate.	There is no Forest Service direction that would prohibit bike use of inventoried roadless areas. Indeed, these areas provide some of the highest quality bike experiences and opportunities.
25	The Forest Service should study the system of forest roads and designate a mountain bike system with these roads.	As discussed in Issue #2, utilizing roads, ATV trails and snowmobile/cross-country ski trails are not the high-quality mountain bike opportunities that most users are looking for.
26	The scoping letter did not provide any evidence that mountain bikers had previously utilized the Tracy Ridge area.	In discussions with mountain bikers, it was brought up that prior to the 1994 bike prohibition, the Tracy Ridge area was utilized by mountain bikers.
27	Bikes should only be permitted on trails specifically built for that purpose (e.g. Jakes Rocks).	The trails at Jakes Rocks are being built specifically for bikes. Features such as turns, berms, and sinuosity are incorporated into the design and construction of the trails. While some of these features are designed for the long-term sustainability of the system, they are also in place for user enjoyment. The contention that bikes only belong on trails expressly built for that purpose is subjective and not supported by research. The Jakes Rocks' trails were not built with excessive development and hardening of the surface. From a sustainability perspective, the principles utilized at Jakes Rocks (consideration of slope, proper drainage structures etc...) are features that are applicable to any non-motorized trail system. There is no rationale to limit bikes to specifically built bike trails as these trails share many of the same features as traditional non-motorized trails such as Tracy Ridge.

## Appendix C – Draft Finding of No Significance (FONSI)

### Finding of No Significant Impact

CEQ regulations require the evaluation of the effects of the project relative to the established definition of significance (40 CFR 1508.13). Based on the information contained in the EA and documentation included in the project record, the proposed action will not have a significant effect on the quality of the human environment. As a result, no environmental impact statement will be prepared. The rationale for this finding is as follows, organized by sub-section of the CEQ definition of significance cited above.

#### *Context*

For the proposed action and no action alternative, 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 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).

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>24</sup>

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.

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<sup>24</sup> For this calculation, the trail width is estimated at 5'.

*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. Although largely subjective, some users may consider the introduction of mountain bikes to Tracy Ridge an adverse impact. Overall, though, 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 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.

*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.*

No cumulatively significant impact on the environment is anticipated based on environmental analysis.

*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 imposed 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 D – Current Tracy Ridge Trail Map

