

**July 28, 2010**

**Via Email to [comments-pacificnorthwest-mthood-zigzag@fs.fed.us](mailto:comments-pacificnorthwest-mthood-zigzag@fs.fed.us)**

Bill Westbrook, District Ranger

Mike Malone, Project Contact

Zig Zag Ranger Station

Mt. Hood National Forest

**Re: Timberline Lodge Mountain Bike Proposal**

Dear Ranger Westbrook and Mr. Malone,

The Friends of Mt. Hood and BARK jointly submit these comments to the Forest Service. As organizations, we represent the interests of thousands of individuals that live in and around the Mount Hood National Forest. Our members and supporters are local residents that enjoy the Mt. Hood National Forests for its serenity, the scenic vistas, the hiking trails, watching birds, paddling rivers, fishing, touring by car, its historical sites and the other opportunities that the Mount Hood National Forest provides.

We submit these comments because we believe that Mt. Hood, Timberline lodge and the hiking trails and historic sites in the area will be negatively affected by the proposal to construct a downhill mountain bike park and trail system adjacent to the Timberline lodge.

**Impact on Timberline Lodge Experience**

Timberline Lodge is listed in the National Register of Historic Places and receives nearly two million visitors a year. The Timberline experience is composed of the historic lodge with a view that includes three Cascade peaks in the distance and Mount Hood looming overhead. Hotel guests and day visitors hike the trails above and below the lodge to experience the views, the meadows, flowers, trees, and the sound of the wind. The historic outdoor amphitheater has recently been restored for intimate gatherings to listen to music and other presentations relevant to this place.

The construction of downhill mountain bike trails and a bike park near the Lodge conflicts with the designation of this historic area. Although the bike park may not be visible from the Lodge itself, the park will result in noise and traffic that will impact surrounding uses. What noises will accompany the bike park and how will this noise impact the experience of visitors to the historic lodge?

While a downhill mountain biking park may be appropriate in some areas, we submit that this use is not consistent with the designation of the historic Timberline Lodge as a landmark nor is it consistent with the historic Timberline trail or with the nearby mountain hiking and climbing access trails that connect Government Camp with Timberline.

The proposed mountain bike trails and skills park pose individually direct, indirect and cumulatively significant impacts on this historic resource.

## Consideration of Alternatives

To fairly assess the alternative, the Forest Service may not just consider alternatives within the boundary of Timberline's permit area. The proposal must be analyzed in the context of what land is available in the Mt. Hood National Forest and in the surrounding area.

Ski Bowl will be impacted economically by this proposal. Ski Bowl could be expanded to accommodate the need for this niche segment of the mountain biking community. The community of available riders does not equal the community of all bike riders in the Portland/Vancouver metropolitan area. The price of a lift ticket, the price of a bike rental, the extreme nature of the kind of biking mean that this market is small – perhaps growing – but likely fairly flat.

The Forest Service cannot rely on a conceptual Master Plan that has not undergone NEPA review to justify a need for this project. The Mt. Hood National Forest Plan does not show a need for this project to occur at Timberline.

Therefore, the environmental analysis that the agency conducts must consider the forest-wide need for this particular niche use and it must consider the available terrain for this use – including opportunities for trail development in areas that do not have lifts. There is no need for lifts for the mountain bike park – there is no particular need to put the skills park up at Timberline. The area is already limited in terms of parking. Ski Bowl or any other available land could easily be developed into a skills park.

The Forest Service must consider the need, the availability of alternative sites, and the economic impact on existing facilities in assessing the environmental impacts of this project.

The Friends of Mt. Hood, the Oregon Chapter of the Sierra Club and Bark submit that the Forest Service must consider a reasonable range of alternatives to siting either or both the downhill trail system or the skills park at a location that is already severely limited for parking and that has unique and special historic characteristics.

Specifically, one alternative would be to consider whether the demand for downhill mountain biking facilities truly exceeds the current supply in the area. Ski Bowl, another area on Mount Hood, currently offers 40 miles of lift-serviced trails for riders of all skill levels, on-site rentals of bikes and equipment, official bike races, and guided bike tours.<sup>1</sup> Willamette Pass in central Oregon also offers lift-assisted downhill biking, as well as sanctioned mountain bike races.<sup>2</sup> Stevens Pass Ski Resort in the Mount Baker-Snoqualmie National Forest in Washington is also in the process of constructing a downhill mountain bike park with lift access.<sup>3</sup>

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<sup>1</sup> Ski Bowl Adventure Park website, <http://www.skibowl.com/summer/bikepark.htm>, accessed July 14, 2010.

<sup>2</sup> Oregon Skyway website, <http://www.willamettepass.com/summer/activities/mountainbiking.php>, accessed July 14, 2010.

<sup>3</sup> Stevens Pass Ski Area website, <http://www.stevenspass.com/Stevens/the-mountain/future-plans.aspx>, accessed July 16, 2010.

The Forest Service should assess whether there truly is evidence that these existing areas do not meet the current demand for downhill mountain biking in Oregon. While Timberline claims that the construction of trails at Timberline will help abate the construction of free-ride trails – Timberline IS NOT offering its trails for FREE.

With this proposal, the Forest Service is authorizing Timberline to construct a pay to play park and trail system – and only those who pay can use the system. This is an expensive option for many people – the bike is expensive enough. The Mt. Hood National Forest is vast. In its alternatives analysis, we submit that the Forest Service must consider options for downhill trails in other locations both with and without lift-assistance. These alternatives can be provided and maintained by the particular user group and/or another operator in another less sensitive and non-historic application.

In its public announcement, the proponent has claimed that there is a need for this trail system and park to abate illegal trail construction but the question that the Forest Service must analyze is whether there is a purpose and need for this niche use – and if so, whether this need can be met at a location other than the Historic Timberline lodge and the high-alpine plants during the one period of relative environmental rest that this planning area experiences.

### **Impact on the Environment**

The proposed mountain bike park at Timberline would impact the environment in a variety of ways. The Forest Service must analyze these impacts.

**Soil Erosion.** The fine volcanic soil and fragile duff layer of the forest floor are highly susceptible to erosion. Removal of vegetation to build the trails will leave the soil much less stable. Trail construction will involve heavy machinery on steep slopes, which will likely cause erosion before the park even opens. The steep downhill sections and sharp turns favored by mountain bikers are the most prone to erosion, especially when bikers lock up their brakes and skid down hills or around turns. This eroded soil can then work its way into streams, damaging valuable riparian habitat and further endangering threatened anadromous fish species. It is reasonably foreseeable that mountain bikers will go off trail, damaging vegetation and causing further erosion. As the soil erodes it will expose plant roots, subjecting nearby trees to damage. These erosive effects are multiplied exponentially during wet conditions, which are not uncommon in western Oregon. The proposed trail area also includes several wetlands and the riparian reserve at Still Creek, which would be negatively affected by erosion.

**Wildlife.** In addition, mountain bikers can cause animals to flee much further than they would flee from hikers, causing them to expend valuable energy and avoid areas that may be prime habitat.<sup>4</sup> This can have a deleterious effect on wildlife of all kinds. The ski permit area contains late seral forest, which provides important habitat for a variety of old growth dependant species. The mountain bike trails will likely cut across habitat and force many animals to change their habits. As bikes move quickly and relatively quietly, they can collide with or run over animals on the trails before the animals have a chance to move.

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<sup>4</sup> See, e.g., Wisdom, et al., *Effects Of Off-Road Recreation On Mule Deer And Elk*, TRANSACTIONS OF THE 69TH NORTH AMERICAN WILDLIFE AND NATURAL RESOURCES CONFERENCE, 531-550.

The Forest Service must address these significant environmental impacts and consider how alternatives in locations with different soil conditions (not volcanic ash that is like confectioner's sugar) would provide a more appropriate venue for the heavy impact from this niche use.

### **Safety and Impacts on Non-Mechanized Users.**

People can be injured or killed by careless bicycle riders on narrow trails. The impact on a hiker from a biker is not the same as the impact of a hiker on a biker. The impact is asymmetrical and the impact is felt far more by the person hiking who encounters the hiker.

Many of our members enjoy biking and hiking. We have members who ride mountain bikes cross-country, we have others who ride bikes for commuting and we have many who enjoy road biking. Our members and supporters recognize that these pursuits have impacts on pedestrians and on hikers.

Downhill mountain biking is unique, and perhaps gaining a bit of popularity but it is still a fairly niche, high-adrenaline pursuit. The bikes are heavy and the rider cannot easily ride them uphill. They either have to be pushed or lifted uphill. Once up, these special bikes fly downhill at top speeds.

Putting mountain biking at Timberline, a place known for its historic hiking trails will put people that will be hiking on the historic trails in the area at risk for suffering serious injury from a collision. Currently, the trails within the permit area and the trails that lead from Government Camp to Timberline are not marked for whether bikes are or are not permitted. The proposal must analyze these safety concerns against other alternatives.

### **Cumulative Impacts**

The Forest Service must consider the direct, indirect, and cumulative effects of its actions on the Timberline Ski Permit area on the Mount Hood National Forest.

**Salting.** Timberline is already dumping a million pounds of salt onto this fragile high-alpine environment every year and this bike park will add erosive run-off to the mix.

**Traffic.** Timberline has a persistent traffic problem. This proposal will increase the people on the mountain at one time and further stress an already over stressed system.

Thus, the Forest Service must consider the proposed mountain bike park in light of all the other activities already allowed on Mount Hood, such as the mountain bike park currently in operation at Ski Bowl, the combined impact of millions of annual visitors to the forest, and application of over one million pounds of salt per year on the Palmer glacier.

When viewed cumulatively, the activities in the Mount Hood National Forest already place a substantial amount of stress on the ecosystem. The proposal to construct a large downhill

mountain bike park covering over hundreds of acres of land poses cumulatively significant impacts to the mountain ecosystem.

### **Substantive Forest Plan Standards**

We understand that A11-014 provides that: “Developed recreation facilities for summer use may occur consistent with other Management Area management direction.” Also at A11-040: Summer off-road vehicle and mountain bicycle use shall occur only on designated trails and roads.”

We also understand that the Forest Plan provides in A11-002: “[d]evelopment facilities shall remain unobtrusive in the landscape,” and in A11-011/012: that “[d]evelopment (i.e. including new construction, reconstruction, or relocation of improvements), administration, occupancy, and use of developed sites and facilities shall be consistent with Management Area management direction. Project specific conditions and specifications for developments shall be determined via planning and environmental analyses for master plans (FSM 2341) and/or special use permits.” (Emphasis added)

We urge you to carefully disclose and consider the impacts, consider alternative sites and apply the relevant forest plan standards under the National Forest Management Act for this area. In particular, we direct you to disclose and analyze the project’s short and long-term effects on the particular soils in this area, the allowable road density, protections for wildlife and plants listed as Management Indicator Species or Endangered under the Endangered Species Act.

### **Conclusion**

We expect that once the Forest Service takes a hard look at the environmental impacts of this proposal and the available alternatives that the Forest Service will see that the location is not the best alternative.

The proposed mountain biking and skill park at Timberline Ski Area are incompatible with the historic character and ambience of the Timberline Lodge.

The Forest Service may want to reconsider whether the need for this project actually exists.

In summary, we respectfully submit that the Forest Service consider:

- whether there is a need for this niche use, a niche use that is distinct from the interest in biking generally;
- whether it is wise to build a mountain bike and skill park and allow the traffic and noise near a place that is a unique and special landmark on the National Register of historic places;
- whether other locations without high-alpine ecosystems containing sensitive and rare plants are available;

- whether there are areas that have not already been hammered by 1 million pounds of salt;
- whether there is another location lift-accessed location that is already in service that can be expanded (i.e. Ski Bowl); and
- whether there is a location that can be offered to people for free or for a far lower cost that is not lift accessed.

We hope that these comments will assist the Forest Service in taking a hard look at the environmental effects of mountain biking in general and downhill mountain biking in particular to determine whether this park complies with the Forest Service mission to “sustain the health, diversity, and productivity of the Nation’s forests and grasslands to meet the needs of present and future generations.”<sup>5</sup>

Sincerely,

Barbara Wilson, Chair, Friends of Mt. Hood  
Dennis Chaney, Friends of Mt. Hood

Alex Brown, BARK

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<sup>5</sup> Forest Service website, <http://www.fs.fed.us/aboutus/mission.shtml>, accessed July 16, 2010.