



United States
Department of
Agriculture

Forest
Service

George Washington & Jefferson
National Forests

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File Code: 1950

Date: October 3, 2005

Subject: Old Sawmill ATV Trail System

To: Interested and Affected Individuals

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Dear

The Clinch Ranger District, of the George Washington and Jefferson National Forests, has been analyzing the proposed development of a motorized trail system for four wheel all-terrain vehicles on the District since August 2003.

This trail proposal was originally intended to meet the increasing need for ATV recreation opportunities in an area where environmental effects could be minimized. The trail system was to consist of about 28 miles of trail utilizing open and closed system roads, existing roadbeds from non-system roads and new construction.

Findings

Our analysis of this proposal and the project area has highlighted a number of environmental concerns:

- The presence of a large beaver wetland resulted in a realignment of the trails and a reduction of 3 miles of trail.
- We had planned to use about six miles of existing roadbeds that are not part of our Forest road system. The intent was to remove the vegetation on these roadbeds and use them with a minimal amount of soil disturbance, causing less soil erosion than new construction. When evaluating these roads in the field it was determined that many were located within riparian areas and that suitable buffers between the trail and the streams did not exist. Relocation of these sections of the trail would result in construction on steep slopes. Removal of these sections of the trail would reduce the length of trail well below the 25 miles recommended for a trail system in the Forest Plan.
- The Stock Creek watershed has two 303d reaches downstream of the project area, part of which is a put-and-take trout reach stocked by the Virginia Department of Game and Inland Fisheries. These reaches are impaired due to metals leaching from mine tailings and poly-chlorinated biphenols (PCB's).
- The Stock Creek watershed is identified as a Priority Watershed under the Jefferson Forest Plan. Direction for these watersheds includes: restore water quality; maintain and restore aquatic habitat; and protect and recover federally listed and sensitive aquatic species.
- There is Designated Critical Habitat for T&E fish and mussels in the Clinch River approximately 6 miles downstream of the trail system. There is also a mussel augmentation site located at the confluence of Stock Creek and the Clinch River.



Conflicts exist with Executive Orders 11644 and 11989 (EO)– **Use of off-road vehicles on the public lands**; specifically **with** sections 3(a)(1) and 3(a)(2):

- Section 3(a)(1) states that: “Areas and trails shall be located to minimize damage to soil, watershed, vegetation, or other resources of the public lands” and;
- Section 3(a)(2) states that: “Areas and trails shall be located to minimize harassment of wildlife or significant disruption of wildlife habitats.”

A review of the Jefferson Forest Plan Screening Criteria for New OHV Areas (Appendix H) and details of potential conflicts are attached.

Water quality is very important in this area. The new trail construction, opening of old roadbeds and opening of system roads that are currently closed will greatly increase the potential for erosion in the project area. As compared with other management activities that use roads for only a short period and then allow the roads to revegetate, this trail system will keep all of the trail area unvegetated throughout the year for the life of the trail system. Even with the use of design features and mitigating measures, the potential for increased erosion and delivery of sediment to the streams is increased. Given the sensitivity of the watershed, I find that this potential for impacts from this proposal to the aquatic system and T&E species is unacceptable.

These findings are the professional judgment of US Forest Service biologists, soils scientists, and hydrologists, based on knowledge gained from watershed analysis and sediment modeling on other projects in similar watersheds on the District. The Forest Supervisor and her staff have concurred with my concerns with the proposal and the project area.

Determination

For these reasons, I am dropping the Old Sawmill ATV Trail proposed action and any alternatives in the project area, as they have a high potential to affect the sensitive aquatic systems downstream. Opportunities to reduce the impacts would result in diminishing the trail system to a level that would not meet our recreation demand or our need to prevent illegal use.

Questions about this determination can be directed to Doug Jones, District Ranger, at (276) 328-2931.

Sincerely,

DOUGLAS H. JONES
District Ranger
Attachments
Appendix H Screening Criteria

cc:

From Appendix H of Forest Plan – Screening Criteria for New OHV Areas

The following is a checklist of minimum considerations for the location of new OHV systems. Screening Criteria is based on 36CFR 295 and FSM 2355. Proposed OHV areas must meet all criteria:

1. Must be compatible with Management Prescription Direction

Explanation: Management Prescriptions limit OHV or motorized use in various degrees. Refer to desired condition statement and standards for each prescription. If all screening criteria can be met the proposed specific areas must then go through the NEPA analysis.

- Need site specific Forest Plan amendment for 7C. The riparian standards of Prescription 7C does not permit ATV roads or trails in the riparian area except at designated crossings. This would also require a site specific Forest Plan amendment. Otherwise there are conflicts with Management Rx 6C.

2. Must be compatible with the Recreation Opportunity Spectrum (ROS) Class.

Explanation: OHV use is not compatible with Semi-Primitive non-Motorized ROS class. OHV areas should be located primarily within inventoried Roaded Natural (RN) areas.

- Project is designated as “Roaded Natural” under the Forest Plan ROS definitions

3. Must be compatible with Special Area Management Direction

Explanation: When proposed in or near Special Areas.

- No special management areas as identified in the Forest Plan exist within the project area.

4. Must be compatible with the Management Direction of Inventoried Roadless Areas

Explanation: When proposed in or near Roadless Areas.

- Project is not within or near an inventoried roadless area.

8. Must minimize conflicts with Private Land

Explanation: The use would not occur if identified conflicts with adjacent private landowners can not be adequately addressed.

- Trail location and design minimize conflicts with private land.

9. Must minimize conflicts with Other Recreation Users

Explanation: Consider recreation users such as hikers, horseback riders, etc., that are already using the area to a significant extent. A new OHV route/trail would not be developed if it would create a high level of conflict with other recreation users with established use patterns.

- Recreation use in the area is currently at a minimum.

10. Must be operationally feasible and provide desirable OHV user experiences

Explanation: Potential OHV areas should be accessible to main roads, have enough room to provide staging areas and suitable camping areas, and be large enough to provide at least 25 miles of route in the future. Short, dead end routes do not generally provide adequate user experience and tend to create illegal use in adjacent areas. A logical distribution of areas should also be considered.

- Proposed trail system meets these criteria. However, elimination of trail segments to avoid sections of the trail that do not meet riparian standards and associated impacts could not be constructed on suitable terrain, would result in the trail system no longer meeting this threshold. Trail systems of smaller lengths have a greater potential to result in illegal use.