

**Update from Friends of Sylvania concerning the placement of a
Bike Trail along the Northwest edge of the Sylvania Wilderness – Feb 3, 2016**

Thanks for your interest in this subject which is critical to the long-term protection and preservation of the Sylvania Wilderness. Friends of Sylvania has studied this complex issue carefully so please read all of this document before coming to conclusions. A list of text sections follows to help you navigate this document.

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I. Introduction

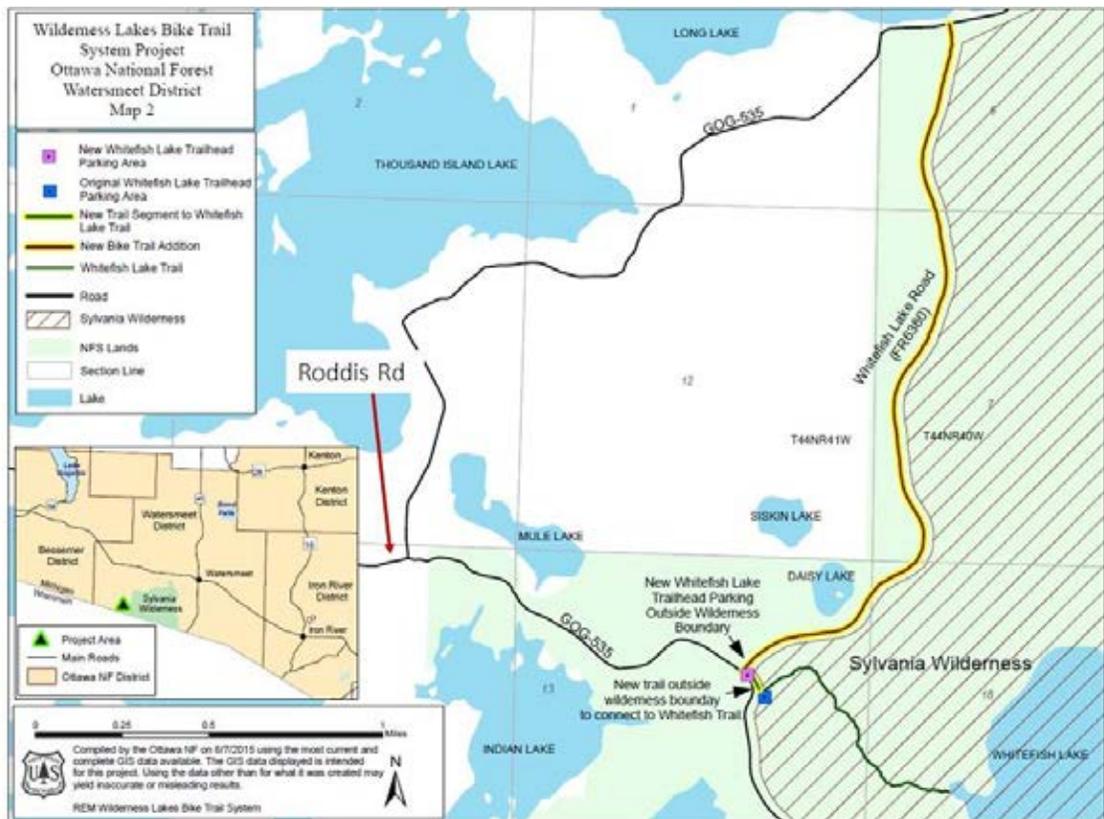
Friends of Sylvania (FoS) is a nonprofit (501(c)3) organization whose mission it is to protect the Sylvania Wilderness and to preserve it for future generations.

FoS is very supportive of silent sports, including biking, and recognizes the hard work people have done to make the Wilderness Lakes Trail System (WLTS) a reality. FoS has, however, not been invited to the planning meetings for the trail loop around the Sylvania Wilderness. We were not aware that FR 6380 (the old Whitefish Road) was being seriously discussed as part of the route until we received a request for comments from the District Ranger in early September. If we had been notified of this intent earlier, we would have expressed our serious concerns at that time, which would have avoided the perception that we are coming in ‘at the last minute’. In reality we are joining the discussion at the first occasion open to FoS. In addition we feel that the significance of reopening FR 6380 should have triggered inclusion of the FoS by both the FS and representatives of the WLTS in the preliminary

planning process. This would have allowed our input earlier in the planning process.

We therefore requested a meeting with representatives of the Forest Service and the WLTS organization to share ideas, to see if we can find common ground, and to foster a better understanding of differing positions. We thank Norm Nass for organizing this meeting on Friday, October 9, 2015. We also thank Allen Piel for attending and sharing information from the WLTS. It is unfortunate that more representatives of the WLTS were not able to attend and share ideas.

Below is a summary of key issues and clarification of our position on those issues. These ideas are based on hundreds of hours of volunteer work over the past 6 years in Sylvania, along FR 6380 and along GOG-535 removing invasive species and clearing trails. We also visited sections of the existing Agonikak Trail to observe current conditions on that completed section of the bike trail, and to record what we observed. We have also studied the WLTS proposal and documents which we only recently received on October 21, 2015.



II. Background on the FR 6380

FR 6380, which runs exactly along the northwest Sylvania Wilderness boundary, was closed by the Ottawa National Forest in the early 1990s. Wooden barriers were erected at both ends of FR 6380 by the Forest Service, with signs indicating that the road is closed to motor vehicles. The District Ranger at the time felt that it was inappropriate to have an open road right along the edge of the wilderness, especially when traffic could easily follow GOG- 535 (Thousand Island Lake Road) to access areas along the west side of Sylvania. The road has now been closed for 22 years, and the roadbed has been naturally revegetating with native trees. These trees (balsam fir, white pine, hemlock) are growing in from both edges of the roadbed and are beginning to provide some shade, which is helping to limit the spread of existing invasive plants along the roadbed (spotted knapweed, European marsh thistle, Canada thistle, and others). The old asphalt surface of the road is gone, now replaced by a surface of compacted small rocks.

At the Oct. 9 meeting, Norm stated that the trees and other vegetation that have grown in from the sides must be removed to establish a road width of 12 feet and whatever additional shoulder would be necessary for a bike trail. This does not sound like a trail but an actual road, so we questioned why such major work would be required for a bike trail. He later suggested that it might be possible to have a width of 10 feet, with limited removal of vegetation along the road shoulder. Either way the revegetating road will be essentially reopened. Earth disturbance created by mechanical equipment would undoubtedly create many areas of exposed mineral soil, allowing for more invasive plants to colonize those areas; and any equipment would spread invasives immediately adjacent to the Sylvania Wilderness.

III. Wildlife Habitat Impacts

The landscape immediately to the east of FR 6380 is a remote section of the Sylvania Wilderness. The area to the west is also a remote area of forest lands and minimally used private lands. This provides a significant area of uninterrupted wildlife habitat. One of the purposes of a wilderness is to provide critical habitat for wildlife and to allow humans the opportunity to experience wildlife in its natural environment. In the summer of 2014, members of the Sylvania Invasives Weed crew enjoyed watching a wolf cross the closed FR 6380. Such enjoyment will be curtailed by the reopening of the road and the impact of bicycle traffic. There is also critical habitat in this area for Forest Service Sensitive Species that are not very tolerant of human disturbance, such as the northern goshawk.

The significant value of the Sylvania Wilderness should be recognized when planning an activity immediately adjacent to that wilderness. There are many bike trails and other places that proposed trail sections might be located. There are very few wildernesses in the Midwest and there is only one Sylvania Wilderness.

IV. Invasive Plant Propagation

- a. The creation of the bike trail and associated publicity will not only bring in bikes but also other activity and disturbances. This will increase the opportunity for new invasives to get established along FR 6380. Garlic mustard, for example, is currently growing in four locations in Sylvania; all four are campsites which shows that that invasive is being brought in on peoples shoes and equipment and possibly also their pets. Garlic mustard thrives beneath the type of forest canopy cover available along the east edge of FR 6380. We are controlling the garlic mustard in the wilderness with tedious hand pulling because chemicals are not appropriate or legal in the wilderness. Garlic mustard and other invasives would be impossible to control along the 2 mile FR 6380 with new seeds of many species being continually introduced.
- b. An equally important threat is the transport of invasives from the roadbed into other areas. The FR 6380 roadbed is currently covered with spotted knapweed. These very fine seeds can easily be picked up by shoes and tires and moved along the southwestern portion of GOG-535 (to the state line) where that species is currently less abundant.
- c. The bike trail will need to be maintained – this will require legal motorized equipment moving along the edge of the wilderness, creating significant noise, further disrupting wildlife habitat, and further increasing the spread of invasive species.
- d. The existing Agonikak trail was visited to better understand invasive species issues and gates for limiting motorized access. In all areas visited we found many invasive plants: sweet clover, spotted knapweed, mullein and curly dock – see the pictures below near Old Military Road.



Invasive species spreading on the Agonikak bike trail

V. **ATV and Snowmobile Issues**

- a. We understand that the WLT folks have worked closely with the local ATV and snowmobile groups to make them aware that the new bike trail would not be open to motorized vehicles. Cooperation between the various groups at this time may be favorable. However, the future is uncertain and the existence of this trail (which would be essentially a road) could lead the ATV groups eventually to push for “their” right to that same access – this would be a very serious threat to the Sylvania Wilderness. We have seen strong and successful pushes in many locations for ATV access to landscapes none of us envisioned. Arguments that the presence of bikes will discourage ATVs is not an adequate solution to this issue: ATVs can go at night and off season, and snowmobiles can go all winter when bikes are not present.
- b. One potential reason for why there apparently are few problems with ATVs and snowmobiles on the Agonikak Trail is that they have their own trail to the west of Highway 45. The original WLTS proposal also allowed some use of ATV’s and snowmobiles on the bike trails – this could lead to confusion and abuse along the perimeter of the Sylvania Wilderness.
- c. While there is currently no trailhead on FR 6380 leading into the wilderness, one will be created by the construction of a short trail connecting the new parking area to the Whitefish Lake hiking trail. Bikes, and probably ATVs and snowmobiles, can easily ‘stray’ onto that trail and into the Sylvania Wilderness. We have already seen this type of incursion into the wilderness in other places where access cannot be properly controlled.
- d. Forest Service does not have the funding for adequate law enforcement personnel to prevent present illegal use by ATVs and snowmobiles around and inside the Sylvania Wilderness. There have been many occasions where law enforcement personnel have not been available to deal with these issues. Pictures below show present illegal use of ATVs on the north and south ends of FR 6380, and in the wilderness.



- e. Several well intended proponents of the WLTS have educated us on the use of gates and barriers to block illegal ATV and snowmobile use. Our visit to the existing Agonikak trail provided the reality of the situation. As the pictures below show barriers can easily be moved and the gates are no real obstacle for ATVs or snowmobiles.





VI. Additional Issues

- a. Sylvania is a relatively small wilderness (by national standards) but a major tourist attraction in Gogebic County. It is already being impacted by a multitude of threats, such as gas motorboats on Crooked Lake, invasive aquatic plants in Crooked Lake, illegal snowmobile use within the wilderness, traffic on FR 6320 running along the eastern boundary of the wilderness, and visitors and their recreational equipment bringing in other invasives. Instead of adding another threat, we should be thinking of how to better protect this fragile wilderness.
- b. In planning bike trail segments, it is very important to consider that GOG-535 is currently being upgraded and will be repaved starting in 2016. This 2.7 million dollar upgrade will include two 3 foot bike lanes for safer bike travel. (A 1.6 million dollar FLAP grant has been received to cover the additional bike lane costs.) As you can see from the area map, this minimizes the need to use FR 6380 for a bike trail immediately adjacent to the Sylvania Wilderness.
- c. The negatives from opening FR 6380 to bikers will greatly outweigh any benefits gained for bikers. The route is not long enough to provide significant safety benefits to bikers who will still have to use much of GOG-

535 and Cty Hwy B which support other sections of this trail system. This old closed road has very little topographic diversity and would not be very interesting biking except for seeing trees (some of which would have to be removed for this trail).

- d. FR 6380 is a remote area and would not be easily accessible if there were an emergency or health issue for a biker. The same is, of course, also true for existing hiking trails in Sylvania but visitors to the wilderness plan their equipment and fitness for that type of remoteness. Bike riders possess varying degrees of physical fitness and few carry a first aid kit of any kind (except possibly a tire first aid kit).

VII. Summary and Recommendations

- a. We are strong supporters of silent sports, including biking; and we would like bike riders to have safe trails. We feel that the best solution would be a combination of safe infrastructures: On GOG-535, from US Hwy 2 to Roddis Road there will be bike lanes after repaving; from Roddis Road to the Wisconsin state line, a bike trail that is similar to the Agonikak Trail and/or a side path could be located to the west or southwest of GOG 535. **To help support this safe alternative that would protect Sylvania from possible motorized activity and invasives along FR 6380, FoS would donate \$10,000** (which could generate additional funding through matching).
- b. We are concerned that by doing only a proposed Decision Memo (and not an Environmental Assessment) for this project, there will be no opportunity to look at potential environmental effects on wilderness, on threatened/endangered species, and also on Forest Service Sensitive Species. We believe that it is very important to examine the potential effects on all of these valuable resources, since any or all of them could be affected by reopening this road along the edge of the wilderness, after it has been closed for some 22 years. In addition, the FS should analyze the potential for new infestations of invasive plants from reopening this road, and an Environmental Assessment would be the appropriate vehicle for doing that. Finally, we think it is important to look at possible alternative routes for the trail (as described above), and an Environmental Assessment would allow for an examination of one or more alternative routes, whereas a Decision Memo would not. **We thereby formally request that an Environmental Assessment be done before FR 6380 would be reopened for any purpose.**
- c. If it is ultimately decided that this closed road is to be used for a bike trail, a complete and thorough plan should be established to treat the existing invasive spotted knapweed so that it does not spread to other locations. **This plan should also include measures to mitigate the spread of other invasives being brought into this landscape adjacent to the Sylvania Wilderness.** The Friends of Sylvania is already overloaded with

protecting the wilderness from invasive species and will not be able to solve problems created by other groups.

- d. In addition, if it is ultimately decided that this closed road is to be used as a bike trail, sufficient gates and barriers should be placed to **definitely prevent** access for ATVs during the bike season (for everyone's safety) and to eliminate the possibility of snowmobiles during the off-season. The existing barriers and gates along the Agonikak portion of the bike trail easily allow passage of snowmobiles and ATVs.

Any re-opening or re-purposing of this road should be accompanied by definite language that restricts all future motorized use of this road. This can be accomplished by a formal Forest Order from the Ottawa Forest Supervisor.

VIII. Comments from Concerned Recreationists against Bike Trail Location

In conclusion we share some of the many e-mails and comments we have received that support a bike trail in a location that properly balances recreation with preserving and protecting the Sylvania Wilderness.

From a local resident, unsolicited:

“After reading the new bike trail proposal and Friends of Sylvania’s response to the new bike trail I have decided to agree with the FoS about not going forward with the new bike trail (on FR 6380). I do believe it could impact the Sylvania Wilderness in a very detrimental way. The Sylvania Wilderness is not only one of the jewels of our area in Land O Lakes but the whole Midwest area of the country. It is a very special place & we need to be serious about it’s protection. FoS already has volunteers working every summer on the boundary roads of Sylvania eradicating invasives and if a new bike trail comes in close contact with the Sylvania Wilderness this will also be the same. As for the safety concerns for bikers on GOG-535- I agree it can be a very dangerous road. I was lead to believe when they repave this road it will contain a bike lane- which would make motorists very aware that it is indeed a bike trail- even though the signage is very good alerting drivers that this is a bike route. Taking all of this into consideration I would vote no to adding the new Whitefish Lake (FR 6380) bike trail.

I have volunteered for the FoS, and I am a current F & G member, and have been hiking/snowshoeing the WF Lake trail for over 20 years & love it just the way it is - quiet and serene.

PS- I am one of the number of folks who won’t be riding on 1K Island roads until they get a bike lane. But I really still believe we should not be riding through the wilderness area either. Hiking & paddling is enough of an impact I think. “

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From a biker and Sylvania volunteer:

“Dear Mr Nass,

I recently received a copy of your letter of August 20, 2015 regarding the Wilderness Lakes Bike Trail System Project. As someone who rides a bike, I can understand the appeal of riding on routes not shared with cars. However, I am concerned about the proposal to use FR 6380 as part of the bike trail system.

As you noted, the Ottawa National Forest's 2006 Land and Resource Management Plan gives guidelines for non-motorized trails. In siting such trails consideration is to be given to "ensuring resource protection, and compatibility with other resource management direction." Since Sylvania Wilderness is managed as wilderness that would seem to be the preferred management direction.

My concern is that putting a bike trail on FR 6380, along the wilderness boundary, would make it much harder to protect the wilderness, from unauthorized motor vehicle use (ATVs and snowmobiles) and the spread of invasive species. As a very small wilderness area Sylvania is already challenged by multiple impacts. It is my understanding that the decision to close FR 6380 to motor vehicles recognized the potential impact to the wilderness of keeping it open.

It would seem to me that having a dedicated bike lane on GOG-535 would be the preferred plan to help preserve the wilderness and provide for biker safety.

Thank you for your attention and the opportunity to make input on this issue. As a volunteer and frequent visitor to Sylvania I am very interested in helping to keep it as close to the original intent of the Wilderness Act as possible.”

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From local residents:

“Dear Mr. Nass,

We are residents of Long Lake and are writing to you in opposition to the proposed opening of FR 6380 (Whitefish Road) to bicycles.

Please understand, we love to ride bicycles. We plan on using the bike trails in the area frequently.

But we also recognize the importance and the uniqueness of Sylvania.

One of the main reasons we chose to move to Long Lake is its proximity to the Sylvania Wilderness Area. Sylvania is a unique and special place. There are very few areas in this country as pristine and pure as Sylvania. Sylvania provides a wilderness experience that is almost impossible to find east of the Mississippi. Sylvania does this in large part through strict rules and regulations. It is only in this way that one can enter Sylvania and be assured of experiencing all the wilderness has to offer.

Placing a bike trail on the perimeter of Sylvania will negatively affect the Wilderness

in many ways:

- **ATVs and Snow Machines:** Regardless of any rule to the contrary, experience has proven that there **will** be ATV and Snow Machines that illegally use the bike trail. Remember – if you build it – they will come. Imagine walking in the wilderness on a bright sunny day, listening to the wind through the trees only to be interrupted by the sound of an ATV or snow machine roaring by.
- **Rule Infractions:** A crushed gravel trail adjacent to Sylvania will encourage users to enter Sylvania without using the main entrance. Such users may not be aware of Sylvania’s rules and regulations – leading to unintended abuse of the rules.
- **Spread of Invasives:** There is a core group of volunteers who devote long hours to stopping the spread of invasive plants into Sylvania. Without these countless volunteer hours, Sylvania would look and feel much different. Imagine a Sylvania filled with Japanese barberry, thistles and garlic mustard. Without the hard and dedicated work of the Friends of Sylvania, the Forest Service would likely be forced to spend quite a considerable effort to attempt to control these invasives. The Friends of Sylvania have had the opportunity to closely study the spread of invasives around Sylvania. Opening FR 6380 will likely exacerbate the invasive problem, we hope the Forest Service listens.

Moreover, the re-opening of FR 6380 conflicts with the Ottawa National Forest’s 2006 Land and Resource Management Plan (“Forest Plan”) goal. Specifically, the proposed bike trail on Sylvania’s perimeter ignores the goal of promoting “diverse and quality recreation experiences within the capability of sustainable ecosystems and consistent with the niche of the Ottawa with an objective to maintain or increase opportunities for *quiet and remote experiences*.” Emphasis added. The proposed Whitefish Road extension will inevitably result in loud machine noises from the illegal use of ATV and Snow Machines.

Simply put, the wilderness experience the Forest Service has spent so much time, effort and money to foster will be significantly compromised by this one simple act.

For all these reasons, we sincerely hope that the Forest Service keeps FR 6380 (Whitefish Road) closed.”

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From Dan Wallace:

“I consider myself a biker but since I learned of the threats of invasive species I have found little time to enjoy that sport. I strongly support all silent sports but feel that we must make wise and sometimes difficult decisions to protect valuable and limited wilderness areas. Having worked on large projects I understand and support efforts like the WLTS to provide safe and enjoyable recreation. Having spent several weeks each year in Sylvania and around FR 6380 and GOG-535, I also understand the threats that this proposed bike trail along FR 6380 will pose for the Sylvania Wilderness.

Some facts and ideas that I would like others to consider while thinking about bike trails follow.

As shown on the area map above, the proposed bike trail FR 6380 and the existing country road GOG-535 (Thousand Island Lake road) make a rough triangle with FR 6380 being the east side and GOG-535 making the south and northwest sides. The length of FR 6380 is about 2 miles. The present biking alternative is 3.5 miles of GOG-535. 2.5 miles of this section of GOG-535 is scheduled for reconstruction and for the addition of a bike lane beginning in 2016. It seems that opening up the possibility of damage to the wilderness when there is an acceptable alternative is foolish. In addition, having spent much time on FR 6380 it seems very much like an abandoned road – it is very flat with no hills or vistas and would not be very interesting for biking.

The proposed segment of the WLTS on FR 6380 is only a small part (~ 2 miles) of a trail system that has many other sections on busy county roads in Wisconsin and Michigan. Average Daily Traffic (ADT) measurement from summer months in 2006, 2008 and 2009 provide the best traffic data available at this time. County Hwy B which supports part of the WLTS has an ADT of 1300 cars. In contrast GOG-535 has only 290 cars per day. This is a very small amount of traffic.

I also assure you that the threat of future illegal and/or legal motorized use of FR 6380 is very real.

To close, bike safety is a combination of many factors including proper infrastructure and public education for drivers and bikers. I would like to see functional bike lanes and/or side paths available in this area to keep everyone safe and protect our valuable wilderness. I am seriously concerned about bike safety because two friends of mine were almost killed by a vehicle in a remote area while biking ON A BIKE TRAIL in Wisconsin.”

IX. Comments from Bike Trail Location Supporters

When a bike trail supporter was told of our concern about unauthorized use and the possibility of future authorized use of the proposed FR 6380 bike trail for snowmobiles and ATVs, we were informed that non-motorized recreationists had been too hard on the motorized folks and that more motorized use would be fairer. This discussion occurred while we were specifically discussing the proposed reopening of FR 6380 immediately adjacent to the Sylvania Wilderness. Imagine the serious damage to the landscape, air pollution and obnoxious noise immediately adjacent to the Sylvania Wilderness. October 2015

When discussing our concerns about the FR 6380 bike trail location another bike trail supporter said that we should not be concerned because there would be so little bike traffic that it would not make a difference. **If that is the case why should the Forest Service reopen this closed road, spend taxpayer’s monies and risk damaging the Sylvania Wilderness for so little gain.** November 2015

**X. Upper Peninsula Environmental Coalition Letter against Bike Trail Location
(UPEC voted unanimously against this location – Jan 2016)**



Upper Peninsula Environmental Coalition
P.O Box 673
Houghton, MI 49931

www.upenvironment.org
upec@upenvironment.org

27 JAN 16

Ottawa National Forest
Supervisor's Office
E6248 U.S. 2
Ironwood, MI 49938

Re: Comments on Wilderness Lakes Bike Trail System Project

Dear Ms. Jackson and Mr. Holland

In general, the Upper Peninsula Environmental Coalition (UPEC) supports the need for more non-motorized trails. However, we oppose the proposed reopening of the old Whitefish Road, creating a crushed rock, 12-15 foot wide bike trail, along the border of Sylvania Wilderness.

Historically, the Whitefish Road was open to street-legal vehicles until sometime in the early-mid 1990s. At that time, the District Ranger at Watersmeet decided to close the road, to reduce impacts to the adjacent Sylvania Wilderness from all types of vehicles (both cars/trucks, and the illegal use by ATVs and snowmobiles that was occurring). We supported that decision. Over the past 20+ years, the old road surface has broken down, trees are now growing in the old road and within the adjacent road right-of-way, and the area is returning to its natural landscape. Despite the barriers erected at each end of the road, some illegal ATV and snowmobile use continues to occur on the old roadbed. If the old road were to be cleared again for a major bike trail, it is likely that this illegal use would likely increase. With the lack of adequate funding for law enforcement, we don't see how the Forest Service would be able to effectively stop such illegal use.

UPEC also has serious concerns with the spread of invasive species. Volunteers spend considerable time and effort each year, removing invasive plants from Sylvania Wilderness. Some of these invasives were introduced when ATVs used Whitefish Road and the seeds spread into the wilderness. Great strides have been made in controlling invasives and reopening Whitefish Road would undoubtedly create a new avenue for introduction of more invasives, such as garlic mustard, European swamp thistle, bull thistle, Japanese barberry, and more. We also expect invasive earthworms will also be moved around the Forest via the wheels of vehicles (including bikes).

In summary, a bike trail right along the edge of Sylvania Wilderness is, in our view, inappropriate. It made sense to close the road years ago to protect the wilderness and it makes sense to keep it closed, especially considering the road is returning to a natural state.

Thank you for considering our input on this important matter.

Sincerely,

Nancy Warren

Nancy Warren
Acting President

Copy to:
Tony Holland, Acting District Ranger
E23979 US 2 East
Watersmeet, MI 49969

UPEC Board Members:

Dave Aho, David Allen, Nick Baumgart, Robert Evans, Grant Fenner, Connie Julien, Jon Saari,
Margaret Scheffer, Horst Schmidt, Connie Sherry, Nancy Warren, Doug Welker

XI – Mountain Biking in the Sylvania Wilderness

A new threat has recently arisen to the Sylvania Wilderness and all U. S. wildernesses. Mountain bikers and mountain bike organizations have written and will introduce legislation in Congress to weaken the Wilderness Act and allow mountain bikes in designated wildernesses. This change coupled with a FR 6380 bike trail would spread addition invasive species, seriously damage trails and natural landscapes, and be devastating to the Sylvania Wilderness. We encourage you to contact your U.S. congressman or congresswoman if you would like to get involved in this critical national issue. For an example letter, see “Form Letters” at the end of the “News” tab.

For more background information see:

<http://www.outsideonline.com/2038461/mountain-bikers-could-get-their-day-wilderness>

Please do not accept the bogus information in this article that mountain bikes cause less damage than hikers. A few studies under selected circumstances does not make valid data. In addition, adding this new sport in most wilderness areas will exceed the “carrying capacity” of these natural landscapes and create unsafe trails for families and hikers.

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The Friends of Sylvania have invested a significant amount of effort to understand and clarify these ideas. If you have any questions or ideas feel free to contact Wally Brinkmann or Dan Wallace so we are **all working together as well as possible to support safe bike trails AND protect the Sylvania Wilderness.**

wabrinkm@wisc.edu
dan.wallace@wisc.edu

Phone: six zero eight 698 five one four four