



April 24, 2023

Mena/Oden District Office
Attention: Mena Trails
1603 Hwy 71 North
Mena, AR 71953

I am writing to you on behalf of the Arkansas Audubon Society, a statewide organization committed to fostering a greater knowledge of the natural history of Arkansas and promoting conservation of natural resources in Arkansas. We are concerned about the environmental impacts that could result from the development proposed under the Mena Trails Project, and we urge those involved (Arkansas State Parks, Arkansas Parks and Recreation Foundation, the U.S. Forest Service, and the City of Mena) to work towards effectively 1) assessing the site-specific risks of the proposed trails at Rich Mountain, and 2) safeguarding the ecosystems of the area against the impacts this project could have.

This region of Arkansas is known for its dramatic topography, numerous streams, and relatively unfragmented forest. These environmental factors contribute to making this habitat valuable to an array of wildlife, including resident and migratory bird species and particularly those that utilize large patches of forest. Checklists submitted to e-Bird indicate over 105 species have been detected at Queen Wilhelmina State Park throughout the year, which is a number that is likely conservative. Species such as the Ovenbird, Black-and-white Warbler, and Summer Tanager that prefer to breed in mature forest raise their broods in locations like this during the summer months.

Many bird species face dramatic declines in numbers due to habitat loss and degradation, and we are concerned that development for mountain bike trails could exacerbate population declines. Mountain bike trails have been shown to increase soil compaction, erosion, sedimentation of streams, and dispersal of invasive plant seeds. Thus, trail systems have the potential to impact the relatively unfragmented forest and streams of Rich Mountain, and perhaps change the value of these ecosystems to birds and other wildlife like black bears, which are known to be abundant in this area. It is easy to look at one project and think "What harm could it do?", but with mountain bikes trail systems being aggressively developed across the state, the additive effect could be harmful at landscape scales.

We urge the U.S. Forest Service and associated partners to take seriously the environmental degradation that often accompanies recreational development even when it is seemingly less-intensive development such as mountain bike trails. This region of the state is well known for offering beautiful landscapes and rich habitat for wildlife, which are already facing numerous threats from environmental changes. We don't want to lose these resources by overestimating the stability of this mountain ecosystem and its ability to withstand the ecological disturbances that even low-density trail systems can bring. Thank you for the opportunity to comment on this matter.

Sincerely,

A handwritten signature in cursive script that reads "M. R. McClung".

Maureen R. McClung, Ph.D., Conservation Chair, Arkansas Audubon Society
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