

Dear Slater Turner and the Ochoco National Forest,

I am writing this letter in support of the Lemon Gulch trail network in the Ochoco National Forest.

I am the current vice president of the Central Oregon Trail Alliance (COTA) as well as a member of the Ochoco Trails group. My wife and I are both native Oregonians and have been Prineville residents since 2013. We both own small businesses in Prineville and have been active members of the community since moving here. I have also been the primary lead within Ochoco Trails for creating the Lemon Gulch trail proposal.

When we first moved here, Prineville had certainly begun its economic transition from a small timber town to something different. At the time, the relatively new data centers were the main, if not only, drivers of an economic rebirth of Prineville. But there were still obvious signs of a struggling community that had lost a primary source of its prosperity (timber). Closed shops and boarded windows were still visible when driving through town. As a professional graphic designer, I felt the need to help however I could. One of the first local clients I had was performed pro bono, helping the Pine Theater run a campaign to raise money and purchase new equipment that was necessary for them to remain open. I have always loved this community and wanted to help it thrive. My motivation for developing the Lemon Gulch trails is exactly the same as it was for helping the Pine Theater keep its doors open - build a thriving community that everyone can be proud to be a part of. The Environmental Assessment recognized the significant economic benefits of trails, and mountain biking specifically, to diversifying the economy of Prineville. Current Crook County Judge and previous County Commissioner, Seth Crawford, hit the nail on the head in 2015 when he said: "Outdoor tourism is our bread and butter." ([https://www.bendbulletin.com/business/bicycling-boosts-crook-county-economy/article\\_54f3482b-f27d-5d0a-9966-649cb588f745.html](https://www.bendbulletin.com/business/bicycling-boosts-crook-county-economy/article_54f3482b-f27d-5d0a-9966-649cb588f745.html))

The Lemon Gulch project has been a long and often arduous process for all of the volunteers involved in getting it to where it is today. When Ochoco Trails was formed as a grassroots group in 2017 it was impossible to predict where it would go, and it was unknown if any projects from the group would ever even reach the level of NEPA review within the Forest Service. When, in 2021, the Ochoco National Forest decided to begin the Environmental Assessment on Lemon Gulch, it felt like an enormous achievement for the group. Of course, as these things go, it was just the beginning. The following controversy, politics and misinformation campaign against the project are well documented, but in the end I am pleased to see the extremely thorough and extensive Environmental Assessment that has been conducted by the USFS. The Forest Service is tasked with balancing many disparate interests on the forest, which means that compromise is always necessary. The Lemon Gulch EA shows that with some compromise, this is clearly the best location for this style of trail network in the Ochocos.

The EA studied six alternatives for Lemon Gulch. Alternative 1 represents no action. A No Action decision meets none of the goals of this project or the Forest Plan but simply caters to one very small group of landowners and permittees. Alternative 2 is the full build out, which is the original trail layout proposed by Ochoco Trails. I would encourage the Forest Service to move forward with Alternative 2 as it most thoroughly achieves the overall goals of this project. Alternatives 3 through 6 represent significant compromises on the original proposal in different ways. Alternative 6 is proposed as the Forest Service preferred alternative. Having mapped and planned the vast majority of trails in Lemon Gulch, I feel that short of the full build of Alternative 2, Alternative 6 represents the best compromise of those proposed in the EA. However I still see several problems with this option that need to be addressed. I will focus my comments primarily on Alternative 2 and Alternative 6.

Alternative 2 was designed and laid out by COTA and, if implemented, would create a complete mountain bike experience for virtually any rider, from beginner trail rider to professional downhill racer. The quality and range of experience offered in Alternative 2 is the best solution to the goals stated in the purpose and need.

Firstly, it further satisfies the Ochoco Forest Plan of having 468 miles of trails; the more miles that are added, the closer the forest is to that goal.

Second, is avoiding proliferation of user-made trails. User-made trails of any type of recreation arise when the experience that a significant volume of users desire is not provided. Planning for and creating the desired user experience responsibly is preferable and results in fewer impacts on other forest users and natural resources than unregulated trail construction.

The third point in the purpose and need is to create loops and downhill/gravity opportunities for mountain bike use. Alternative 2 clearly provides this with a long cross-country trail and a wide range of gravity-specific trails. Expert gravity trails are an experience that is severely lacking in Central Oregon and is one of the most requested trail types that COTA receives.

Next is accessibility and trail difficulty. One big aspect of this trail plan is to create a portion of trails that are specifically built for adaptive mountain bikes. Adaptive trails take into account the unique characteristics of adaptive bikes but are no less enjoyable to ride on standard bikes. Trails that implement universal design principles and thus accommodate adaptive bikes are standard practice for new trail development in many places around the world but are limited in Central Oregon because many of our trails were created before adaptive mountain bikes were widely available. When addressing trail difficulty, it is much easier to ensure a broad range of difficulty levels when more miles of trail are being created. It also means more riding options for any given rider's ability.

Lastly, and perhaps most urgent in the Ochocos, is the need to draw current and future mountain bike use away from other areas, such as Lookout and Round Mountain. Lookout Mountain is well known in the mountain bike community as a world-class mountain bike ride. Lookout is also highly regarded in the equestrian and hiking communities. It is a certainty that use on these trails will increase significantly in the next 10-20 years. Along with that use comes an increase in negative experiences. Since mountain bikes tend to travel further distances at higher speeds, even when they are practicing proper trail etiquette they can inadvertently spook a horse or hiker. Lemon Gulch would be less travel time from Prineville and create a more desirable experience for a majority of riders. The effect being that far fewer riders would make the effort to ride the more remote trails in the Ochocos.

Alternative 6, the USFS preferred alternative, is nearly half the miles of trails of Alternative 2. Reducing the trail miles down this much immediately causes the alternative to come up short in relation to the stated purpose and need. The Ochoco Forest Plan set a goal in 1989 of having 468 miles of non-motorized trails in the forest. By reducing mileage in proposals such as this by such a significant amount how would the USFS ever possibly achieve this goal? It is estimated that 15% of Oregonians ride bicycles off road each year<sup>1</sup>, yet this sport is barely provided for in the 850,000-acre Ochoco National Forest. If we applied this statistic to the goal of 468 miles of trails, we should expect to see 70.2 miles of trails in the Ochocos with a designated primary purpose of mountain biking.

Additionally, fewer miles also means less variety in trail style, difficulty and overall riding experience. Therefore we can expect less beneficial effects on issues of crowding, user conflict and creation of user-made trails. From the analysis in the EA, it appears Lemon Gulch is one of the best areas in the Ochoco National Forest to build trails while minimizing impacts on other resources.

I am happy to see that the trails flagged specifically with adaptive bikes in mind are mostly retained on Alternative 6.

Aside from these broad shortfalls of Alternative 6, there are a couple of technical issues in the revised trail layout that should be considered if the Forest Service decides to move forward with this alternative.

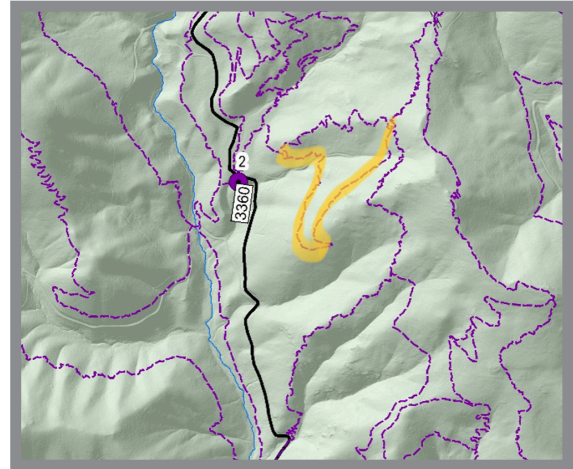
The first, and most significant issue, is the removal/realignment of the North-South arterial trail below FSR 3360. The original trail design allowed for all trails to funnel into this trail and lead riders down to the lower trailhead. In

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1 Bergerson, 2018.

the original layout this follows just above the creek and allows for an easy green trail that any rider can enjoy. In Alternative 6, this has been moved to a position above FSR 3360. Knowing this terrain intimately, I feel that a green trail would be extremely difficult to design in this location; it is extremely steep directly above the road and would risk rock and debris falling into road traffic. Additionally, it appears this would require riders to ride uphill to access this trail before descending to the lower trailhead. Pedaling up this steep climb will be undesirable or even impossible for riders with less fitness or riding on downhill specific bikes. The result of this is that the middle trailhead could likely become the primary location for shuttling as riders would simply avoid continuing down to the bottom of Lemon Gulch. The limited space available here makes this not ideal. One other point is that removing this catch trail reduces the amount of green/beginner trails in the network.

The second notable point on Alternative 6 is the omission of the short trail near the middle area of the network (yellow line on image included). It is included on Alternatives 2, 3, and 4 and it does not appear that the EA identifies any specific environmental or resource concerns with this trail. It falls on an open ridge line that does not appear to have specific grazing concerns and is surrounded by other trails, therefore, would not fracture the existing wildlife corridors. While short in distance, I would recommend including this as part of Alternative 6. It is mapped as one of the easier trails and would provide another option for beginner or intermediate riders. Adding this trail to Alternative 6 is especially important if the green/beginner the North-South arterial trail is not also added to Alternative 6.



I appreciate that Prineville has a long history and distinct culture. Economic prosperity does not need to equate to a culture change. Many communities benefit widely from tourism without changing their underlying values. Some of the most vocal individuals expressing opposition do not even have primary residence in Crook County, yet feel they have a right to act as gatekeepers of the national forest simply because they own large properties nearby. For example, in a Bend Bulletin Article published on 11/18/22, Dave Nielsen says he advocates only for a “no action” alternative, exhibiting zero willingness to compromise.

The national forest is federal public land and certainly all Americans have a right to express their opinions about its uses. Those that are not willing to support the Lemon Gulch Trails Project now that the Environmental Assessment has clearly demonstrated that the project can be implemented with minimal impact on grazing, wildlife, and other aspects of the natural environment, clearly care more about their personal interests than the reality of the impacts or the good of the community. I encourage the Forest Service to see the arguments of the few people that advocate for the no action alternative for what they are: a selfish desire to restrict access to public land to serve the private interests of a few individuals.

I believe that our national forests should be open to all. The Lemon Gulch Environmental Assessment clearly shows that environmental and resource concerns can be mitigated through compromise and thoughtful planning. Therefore, I encourage the Forest Service to move forward with this project.

Sincerely,

Travis Holman  
Vice President | Central Oregon Trail Alliance