



December 9, 2022

Beth Peer  
Forest Environmental Coordinator  
Lookout Mountain Ranger District  
3160 NE Third Street  
Prineville, OR 97754

Dear Beth Peer,

Thank you for the opportunity to comment on the Lemon Gulch Trail System project on U.S. Forest Service lands located in the Ochoco National Forest.

On behalf of the PeopleForBikes Coalition, I am writing in support of the USFS's efforts to develop new recreation opportunities on public land for mountain bikers. We support proposed Alternatives 2 and 6, which would create between 27.5 - 51.3 miles of new mountain bike trails for users of all ability levels. This includes strong support for Alternative 2, the USFS Preferred Alternative.

The PeopleForBikes Coalition is the national advocacy group and industry association that works for better policies and infrastructure for bike riding. We strive to make bike riding a safer and more inclusive activity for everyone, including those that ride mountain bikes on natural surface-singletrack trails.

PeopleForBikes supports the overarching goal of the Lemon Gulch Trail System, of constructing and maintaining more mountain bike-optimized recreational trails, as new natural surface single-track trail construction is urgently needed to help support existing levels of recreation on public lands. The creation of new single-track trails would help avoid the proliferation of user-created trails that have occurred in other areas, where the community need was ignored or neglected. We applaud the allowance of bicycles on new trails and are pleased that mountain biking access will be considered as part of the proposed Alternatives 2 and 6. Federal land management agencies are critical to recreation infrastructure, as many of the best mountain biking and bicycling trails in the U.S. are on federal public lands.

In addition, I would urge you to consider authorizing Class 1 pedal-assist bicycles on all trails where mountain bikes would be allowed within the Lemon Gulch Trail System. Existing research from the USDA Forest Service and the East Zone Connectivity and Restoration Project in Tahoe National Forest indicates that pedal-assist Class 1 electric bicycles can be successfully incorporated into trails with non-motorized uses.<sup>1</sup> The East Zone Connectivity's decision notice included the designation of 35 miles of existing non-motorized trails as open for Class 1 electric bicycles and determined that their access to the trails did not significantly alter public enjoyment or affect the patterns of use on the trails for Class 1 electric bicycle recreation.

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<sup>1</sup> USDA Forest Service. "Tahoe National Forest East Zone Connectivity and Restoration Project Draft Decision Notice." (2021).



**peopleforbikes**

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Thank you for your consideration of our comments. I would welcome the opportunity to provide further information on the potential for creating more trails for use by bicyclists and mountain bikers on federal public lands.

Sincerely,

Rachel Fussell  
eMTB Policy & Program Manager  
PeopleForBikes Coalition  
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