



# OCHOCOTRAILS

**December 12, 2022**

Ochoco National Forest  
3160 NE Third Street  
Prineville, OR 97754

Comment on Lemon Gulch Trail System #58831

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Ochoco Trails is pleased to provide our comments on the Lemon Gulch Trails Proposal.

As a community-based coalition of diverse non-motorized user groups, Ochoco Trails is dedicated to our mission of building and maintaining a sustainable non-motorized trail system that offers a desirable range of experiences, while protecting and enhancing forest resources for future generations.

The Lemon Gulch trail proposal is part of a comprehensive trail proposal Ochoco Trails submitted to the Forest Service in 2019. The goal of this proposal was to address the increased demand for non-motorized recreation in the ONF and to reduce user conflict on existing trails. Ochoco Trails also identified a need for trails built to mountain bike specifications, as none currently exist.

The comprehensive EA released by the Forest Service thoroughly addresses the potential environmental impacts of a trail network in the Lemon Gulch area and clearly shows that environmental and resource concerns can be mitigated through careful planning.

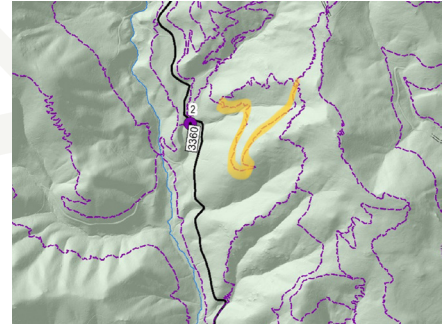
The EA identifies six alternatives for a Lemon Gulch trail network. Alternative #1 represents No Action. A No Action decision meets none of the goals of this project or the Forest Plan, nor does it align with the mission of Ochoco Trails. Alternative #2 is the original trail layout proposed by Ochoco Trails and Alternative #6 is the Forest Service preferred alternative. The comments below will focus on Alternatives #2 and #6.

Ochoco Trails fully supports a robust bike trail network in Lemon Gulch and, while we understand that one of our valued members, COTA, would strongly prefer Alternative #2 because it more thoroughly achieves the overall goals of this project and provides the best alternative for a proactive approach to meeting the increased demand for non-motorized recreation in the ONF, we are willing to support the preferred Alternative #6 with a few modifications as outlined below.

1. Reinstate the North-South arterial trail below FSR 3360. The original trail design located this trail to follow just above the creek and allowed for an easy green trail that all riders could navigate down to the lower trailhead. In alternative #6 this trail has been moved to a position above FSR 3360.

The terrain in this area is steep and will not lend itself to an easy return to the lower trailhead. The realignment of this trail will force riders to return to the lower trailhead via the road or bypass the lower trailhead completely and use the middle trailhead instead. In addition this change reduces the number of green / easy trail miles in the proposal. We would like to see the North-South arterial trail below FSR 3360 included in Alternative #6.

2. Reinstate the short trail near the middle area of the network (image included). This trail, which is isolated on an open ridge line and surrounded by other trails, was included in Alternatives #2, #3, and #4. The EA does not appear to identify any environmental or resource concerns, grazing concerns, or fragmentation of wildlife habitat related to this trail. While short in distance, this trail would provide an additional easy trail. OT would like to see this trail included in Alternative #6.



Ochoco Trails is committed to balancing recreation demands with protecting and enhancing forest service resources for future generations. The Lemon Gulch Environmental Assessment clearly shows that environmental and resource concerns can be mitigated through compromise and thoughtful planning. Therefore, Ochoco Trails encourages the Forest Service to move forward with this project.

Sincerely,

Darlene W. Henderson  
Chair, Ochoco Trails