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c/o Environmental Center
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15 December 2022

To:
Beth Peer
Environmental Coordinator
Ochoco National Forest
3160 NE 3rd Street
Prineville, OR 97754

Regarding: Lemon Gulch Trails Project Draft EA, https://www.fs.usda.gov/project/?project=58831

Environmental Coordinator Beth Peer:

The Juniper Group Sierra Club, representing over 2000 members in Eastern Oregon counties, is responding to the Ochoco National Forest (ONF) request for comments on Lemon Gulch Trails Project Draft Environmental Assessment.

We appreciate that the DEA did take into consideration some of the issues raised by the greater community during the scoping period. The ONF did not address several issues because they were considered "outside the scope" of this project. While we and the community may not agree with this description on some of those issues, we will try to keep our comments to areas the ONF does consider to be in scope.

Problems In EA

The DEA refers to the 1989 Forest Plan reference to creating 563.6 miles of summer use trails. An error in the DEA is listing this mileage under the sub-heading *Non-motorized Trails* on page 27. While the first paragraph under this sub-heading correctly states that some of those trails are for ATV routes, the distinction must be made that the Forest Plan calls for 487.1 miles of non-motorized trails and 199.5 miles of motorized ATV trails.[1] Arguments in the EA for how this project contributes to this goal must be made against the 487 miles, not the 563 miles as was done.

Per the DEA (p. 27), there are currently about 156.5 miles of existing non-motorized trails in the ONF. The 1989 Forest Plan outlined creating up to 487.1 miles of non-motorized trails by 2009. This number conceived in 1989 may no longer be appropriate given the many changes since then, including scientific understanding of environmental issues, social changes in the area, and economic changes, but it is still the cited number in the active Forest Plan. Still, little weight should be given this measure without a review of its basis, current conditions, and cumulative effects since 1989.

1 1989 ONF Forest Plan, Table 4-20, p. 4-24.

Note that the Forest Plan also described that by 2039, “Most developed recreation sites will have completed construction and reconstruction, and will be under a fee structure with maintenance costs being recovered.” (p. 4-25) While in the Forest Plan, user fees were not considered in this DEA because of FLREA requirements which were not designed into this project (p. 9). No reason was given for this oversight. If this measure in the active Forest Plan was not considered, why should the measure for trail miles discussed in the paragraph above be given any stronger consideration?

We also note that the DEA mentioned trail development work by the Ochoco Trails group (p. 21 and others). We wish to point out that some trail maintenance performed by this group on multi-use trails included features such as jumps that are designed for mountain bike users and are an obstruction to hikers and equestrian users. As such, hiking trails have been formed around such obstructions and this increases the size of the soil footprint discussed next. It is reasonable to expect the same results will be seen on trails in this project.

We strongly disagree with the ONF description of the footprint of each alternative in the “Comparison of the Alternatives Analyzed in Detail” section. Table 5, p. 20, is described as showing that “All action alternatives have a footprint of less than one percent of the project area (Table 5).” (p. 19) This footprint is documented in the EA as being only for soil disturbance, as is further described under the “Soils” section, subsection *Environmental Effects*, starting on p. 83. The actual footprint of a trail is much broader than its impact on soils, it must also include the brushing, soundscape, and wildlife disturbance the trail and network of trails brings to the valley. Brushing and tree removal beyond the tread is done to provide safe viewing distances for riders, especially necessary on faster stretches. The recreational activities on the trails in this project have a large soundscape due to people communicating (shouting) with each other or yelling in excitement. The flight distance of deer from a trail (the distance from the recreationist at which the deer take flight) can be 150 meters (492 feet) to either side of the trail[2], while elk maintain a separation from recreationists of greater than 550 meters (1804 feet)[3]. This wildlife disturbance footprint thus could effectively be, for some species, the whole of Lemon Gulch, considering how sounds can carry across this narrow valley (mostly less than 1 mile, about 1600 meters, across, ridge to ridge). In addition, there will be increased vehicle traffic along the roadway between the parking areas, especially with the shuttling of riders and bikes that is foreseen, and vehicle traffic creates an even wider wildlife disturbance footprint. The sounds, scents, and activities of recreation in this valley at an intensity that grows over time will deter most large mammals, including cougars, wolves, black bear, coyote, elk, and deer, from entering for more than brief periods or from even moving through the area. While the DEA discussed wolves in a cursory manner, it fails to note how this complex of trails will effectively eliminate most all of Lemon Gulch as secure habitat for most animal species.

The DEA does discuss wildlife disturbance, specifically elk and deer, of this trail network under each alternative starting on page 56. Discussed are times when construction work will not happen in order to reduce disturbance, but not times for trail closure for this reason. The DEA also does present an analysis of how trail users will disturb and affect livestock distribution (p. 77). These livestock disturbance effects obviously would be affecting wildlife as well, and should have been addressed.

2 Taylor, Audrey. “Wildlife Responses to Recreation and Associated Visitor Perceptions.” Ecological Applications, 2003.

3 Wisdom, M.J., H.K. Preisler, L.M. Naylor, R.G. Anthony, B.K. Johnson, and M.M. Rowland. “Elk responses to trail-based recreation on public forests.” Forest Ecology and Management, 2018.

The DEA makes conjectural statements about future use of this trail system, about the effectiveness of the educational efforts to be put forth, and about how well the crowds will keep the area clean.

For example, the DEA asserts that the size of the proposed trailhead would constrain the size of recreation events. As has been seen at the overcrowded and overflowing trailhead parking areas on the Deschutes National Forest, this is not really a limiting factor as people will park along roadsides after parking areas fill up. This happens for both for events as well as under the growing daily use of these trails. This growth is also projected for the ONF (p. 34 and others).

DEA also states that there are no “reasonably foreseeable future projects that would affect the amount of recreation use in the area” (p. 33), while at the same time presenting data about the growth of local human populations and recreation overall (p. 34 and others). It is reasonable to look ahead and see that as recreation demand continues to grow, more trail projects will be proposed. As a case in point, even this DEA project to expand mountain bike trails was not foreseen 10 years ago. Consider also the public pressure that COTA and IMBA are bringing to move this project forward. It is reasonable to expect that the alternatives that leave most of the West side of the valley without trails, future pressure will build to expand the East side trails to the West side, and increase the size of the parking areas. It is a reasonable conjecture that the increasing population of Crook County and the increasing number of ONF recreationists of all types, as documented in this DEA, will result in foreseeable future projects to accommodate this recreation.

As for the conjectures made in the DEA about the effectiveness of educational efforts and the responsibilities taken on by users of this trail network, current actions by ONF users argue against this optimism. Trailheads, dispersed campgrounds, and party areas throughout the ONF are littered with trash of all sorts. One cannot drive roads in the ONF without seeing beer cans in the ditches. Illegal firewood and other cutting of trees is common throughout the forest. There are always a few “bad apples” in the crowd, and the inadequate funding for enforcement personnel adds to this problem.

We also note that the DEA does not mention electric bikes, e-bikes. E-bikes should be noted and excluded from all of these non-motorized trails. While this may be obvious to some people, others may attempt to challenge this assumption unless it is included in restrictions that are posted.

The DEA notes the poor condition of much of Lemmon Creek and Schoolhouse Creek in this project area (p. 91ff). Still, some alternatives proposed include stream crossings. We do not support further degradation of riparian area by developing trails that add to the damage already present.

Areas of Some Agreement With Multiple Use Forest

We agree that the recreation use of our public lands by mountain bikers should not be completely forbidden. We agree that recreationists of all forms should share our limited public land resource where possible, while also protecting the greater good by providing adequate space for wildlife, ecosystem services, and overall environmental needs.

The growing community of mountain bike recreationists are one of the many forms of recreational communities that are increasing their use of ONF. It is now common for hikers to encounter mountain bikers on many of the multi-use trails, while it was not so common just 5 or 10 years ago. The crowding of trails on the Deschutes National Forest is pushing many recreationists to journey to the

ONF, as well as the growing population of Crook County brings in more mountain bikers, trail runners, and hikers.

One difficulty is how to provide for more intensive recreational use while protecting the ecosystem and the natural characteristics of the forest, those factors that provide the basis for so many people to come recreate in the forest. Three ways to achieve this are to one, restrict some activities to limited areas; two, to restrict the number of people doing some activities at certain times; and three, to limit the type of recreational activities. This project and its alternatives attempt to entice some mountain biking activities to this one watershed. There are no plans to limit the numbers of people, except by limiting parking areas. And limiting the type of recreational activities to those most protective of the ecosystem is only done in this project when comparing one alternative to another, where the no action alternative achieves this best. In particular, this DEA should point out that there is no requirement that the ONF provide trails for all forms of mountain biking, such as advanced or expert riders, which cause more trail conflicts and wildlife disturbance than the casual mountain bike rider. There is a need for mountain bike trails in the ONF, but not at the density in the proposed action alternatives which transform this watershed into a bike resort, like a ski resort transforms a mountain side.

Recommendation for this DEA

The Juniper Group of the Oregon Sierra Club recommends the Alternative 1, the no action alternative.

Of the action alternatives, we see that Alternative 3 meets some of the demand for mountain bike trails designed for mountain bikes, one of the trail user objectives (p. 27). This is also the action alternative that most closely meets the needs of protecting the ecosystem and the natural characteristics of the forest. We do not see that the role of the ONF is to provide trails designed for advanced/expert riders, as compared in Table 3 (p. 19). Rather, the role of the ONF is to provide recreationists with access to a natural forest ecosystem, for enjoyment and education. Trails for riders seeking thrills or skill challenges should be met on trails without conflicting uses, such as the lower and upper 66 trails on the West side of Prineville. There are also harder trails included in the recently developed Bandit Springs network of trails.[4]

All the action alternatives in this DEA are effectively developing this watershed into a mountain bike recreation area, mostly excluding other types of recreation, and creating conditions unfavorable to wildlife. It would be better for the ONF to look at cross country bike trails, using existing roads (both open and closed) with minimum new trail development, that provides beginner and intermediate riders pleasant rides through natural forest ecosystems, with greater possibility of seeing wildlife and vegetation at all stages of growth from fire scars to large trees. While expert mountain bike riders may prefer to challenge their skills in a public forest, this is in conflict with other user groups and the natural environment. As our mission is to “explore, enjoy, and protect the wild places of the earth” and to “promote the responsible use of the earth’s ecosystems”[5], we recommend the ONF use the no action alternative.

4 Mountain bike trails, Prineville area: https://www.trailforks.com/region/prineville/?activitytype=1&z=9.5&lat=44.41626&lon=-120.60969

5 Sierra Club Mission, see: https://www.sierraclub.org/about-sierra-club

This Lemon Gulch DEA, along with the cumulative effects of other current and future projects, will easily result in a forest which no long meets the overall environmental needs of the forest or of this community. With the imperative of combating climate change, maintaining a healthy environment must be the primary objective of managing our public lands. We will continue to monitor the ONF projects in order to protect as best we can the responsible use of the forest and the environment.

Sincerely,

/s/ Mathieu Federspiel
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