



December 15, 2021

Slater Turner, District Ranger
Lookout Mountain Ranger District
U.S. Forest Service
3160 NE Third Street
Prineville, OR 97754

Subject: Scoping Comment, Lemon Gulch Trail System Project #58831

The Oregon Mountain Biking Coalition (OMBC) is Oregon's statewide mountain biking coalition, a group of regional trail organizations representing mountain bikers across the state. We provide stewardship, education, and support for the creation, enhancement, and protection of mountain biking experiences in the State of Oregon. OMBC's vision is to establish Oregon as a premier mountain biking destination, offering a diverse set of riding experiences in all settings from backcountry to urban, for riders of all types and abilities.

More than 620,000 Oregonians cycle off-road each year; that's 15% of our population. And bicycle tourism feeds \$400 million into Oregon's economy each year.

The proposed Lemon Gulch Trails Project aligns with OMBC's mission and vision, and we strongly support its development.

The Environmental Assessment presents multiple alternatives for a well-planned and thoroughly analyzed mountain bike trail network. The Ochoco National Forest Management Plan specifies a need for 468 miles of non-motorized trails, including mountain bike trails. Currently there are only 156.5 miles in the Ochocos, none of which have a primary purpose for mountain biking. The Lemon Gulch proposal represents the perfect opportunity for the Forest Service to begin addressing the deficit of recreational opportunities in the Ochocos as specified in the 1989 Forest Plan.

OMBC strongly encourages the Forest Service to select Alternative 2, which would best satisfy all of the elements of the purpose and need as stated in the Environmental Assessment. Only Alternative 2 would provide a robust enough trail system to meet the stated objective to "draw and more evenly distribute current and future mountain bike use away from other areas such as Lookout and Round Mountain to minimize interactions with other users and improve the experience and safety of equestrians and hikers in those areas."

The Forest Service has identified Alternative 6 as its preferred alternative. While we appreciate that compromise is important, the analysis in the Environmental Assessment indicates that adverse impacts on grazing, wildlife, and other resources would be well below the threshold of significance regardless of which alternative is chosen. With only 53% of the mileage proposed in Alternative 2, Alternative 6 would not fully meet the stated objective to "provide various levels of accessibility and trail difficulty to suit a wide array of people." Therefore, the Forest Service should select Alternative 2 since it would have similarly minimal adverse impacts and superior positive impacts on recreation.

We appreciate the efforts of the U.S. Forest Service Lookout Mountain Ranger District in evaluating and advancing this project and encourage you to move this project forward in a timely manner.

Respectfully:

OMBC Board of Directors

A handwritten signature in black ink, appearing to read 'N. Kuder', with a long horizontal stroke extending to the right.

Nathan Kuder
President

Angela Mart
Vice-President

Emmy Andrews
Treasurer

Paul Hobson
Secretary