

December 18, 2011

This letter of support for the Lemon Gulch Trail proposal.

I have been a participant in Ochoco Trails (OT) since 2017. I have also been the Chair of OT for the past 3 years.

Prior to my participation in OT, I started the Crook County Chapter of COTA.

COTA first submitted a trail proposal to the Forest Service in 2014. This was a proposal for 140 plus miles of mountain biking trails across the entire ONF. After going through three Forest Supervisors this proposal basically died on the vine. This original trail proposal however, was the impetus for forming OT.

The Lemon Gulch trail proposal was part of a comprehensive trail proposal OT 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. OT also identified a need for trails built to mountain bike specifications as none currently exist.

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 OT. Alternative #2 is the original trail layout as proposed by Ochoco Trails and Alternative #6 is the Forest Service preferred alternative.

The comprehensive EA released by the Forest Service clearly demonstrates the need for additional trail miles especially given the fact that only 33% of the trails envisioned in the 1989 Plan are on the ground 33 years later. However, I am concerned that while the need for more trails is so clear, the Forest Service has still selected Alternative 6 (27.5 miles of new trail) as its preferred alternative. Selecting Alternative 6 would only increase trails provided as a percent of those envisioned from 33% to 39%. Alternative 2 (51.3 miles of new trail) is clearly the better choice.

The comprehensive EA also thoroughly addresses 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. Because the mitigation measures presented thoroughly address the resource concerns in alternatives 2 - 6, there is no basis for the reduced mileage in Alternatives, 3, 4, 5, or 6.

I am concerned about Appendix C, the Implementation and Monitoring Plan. As written, the phased implementation would take a decade - which means that in 10 years the forest would still only be at 39% of the trails envisioned in 1989 if Alternative 6 is selected! If Alternative 6 is truly the preferred alternative, I urge you to condense the implementation and monitoring to a 2 to 3 year timeframe.

In addition, Appendix C raises questions about how it can be implemented in an impartial manner. Natural systems are influenced in complex ways by multiple factors, including temperature, precipitation, vegetation patterns, and much more, and thus exhibit natural variability over time. The project area is open to other users - hunters, campers, hikers, off-road drivers and more - so human disturbance would not be limited to mountain bikers. Logging is also planned for the area. It does not seem reasonable that the Forest Service could use the plan as written to impartially determine that any changes noted are due to mountain

bikers and not to other factors or a combination of factors. I would therefore suggest that Appendix C be revised to include only those variables for which impartial analysis of mountain bike specific impacts can be assessed. If this is not possible, I suggest removing this section.

The Mill Creek area and the Lemon Gulch trail proposal are close to town and this proximity can make access to recreation on adjacent public lands more affordable for Prineville residents. This is particularly important for Prineville where the median income is below the county and state median income levels and 17% of the families have incomes below the poverty level (per data cited in the May 2021 Crook County Parks and Recreation District's *Unified Parks and Recreation System Plan*).

Crook County is the second fastest growing county in the state of Oregon (per the Portland State University Population Research Center statistics printed in the December 6, 2022 edition of the Central Oregonian). With this kind of growth, the demand for increased recreation opportunities in the adjacent public lands will only increase.

I would encourage the Forest Service to move forward with Alternative #2 as it most thoroughly achieves the overall goals of this project. It also provides the best alternative for a proactive approach to meeting the increased demand for non-motorized recreation in the ONF. Even at 52 miles, it is only about one third of the original trail miles, and a much smaller footprint, then what was proposed by COTA in 2015. When combined with the existing 152.5 miles of trail it will only achieve 44 percent of the desired 468 miles.

If Alternative #6 is truly the preferred alternative, I would like to share the following concerns:

1. The removal/realignment of 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 unintended consequences of this change will force riders to return to the lower trailhead via the road or bypass the lower trailhead completely and just use the middle trailhead. In addition this change reduces the number of green / easy trail miles in the proposal.
2. The omission of the short trail near the middle area of the network (image included below). This trail, which is isolated on an open ridge line and surround 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 fracture of wildlife corridors related to this trail. While short in distance, this trail would provide an additional easy trail. I recommend including this trail as part of Alternative #6.

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,  
Darlene Henderson

