

December 19, 2022

Beth Peer, Environmental Coordinator

Ochoco National Forest

RE: Oregon Hunters Association Comments on the Lemon Gulch Draft EA Project #58831

The Oregon Hunters Association (OHA) is a sportsmen’s conservation organization with nearly 10,000

members in 26 chapters across Oregon. OHA values our National Forests as a public place to hunt and recreate, and also as a valuable asset providing habitat for the wildlife we care about. As such, the management and access of these lands are of critical importance to OHA. We have been engaged in numerous projects to improve and protect habitat conditions on the Ochoco National Forest (Forest), and we value our partnership with the U.S. Forest Service (USFS). We are providing comments and input on the Lemon Gulch Trails Project draft Environmental Assessment (EA).

OHA has two key concerns with the proposed project should any Alternative be selected outside of Alternative 1 (No Action): Wildlife Impacts and Recreation Users/Hunting Conflicts

**Wildlife Impacts:**

While OHA appreciates the recognition that the proposed Lemon Gulch Trail project is located to avoid areas of important summer range along the summit of the Ochoco Mountains and includes seasonal/winter closures of both the motorized system and non-motorized mountain bike trails, it fails to address other impacts to elk.

A primary concern is the total road and trail density included in the project. A large part of the project area is to be managed under the management designation of General Forest Winter Range (MA-F21). Under this management area, the density of trails and roads is not to exceed 3 miles per section. However, road and trail density for much of the project area exceed desired condition and standards and guides for Winter Range and General Forest Winter Range. In the EA (pg. 115 and 116) existing road mileage is reported to be 11.17 miles of usable road and 4.38 miles of custodial care roads (closed). If the project area is approximately 3,300 acres then it encompasses approximately 5.2 sections. Under this management area designation, that would allow for a maximum of 15.6 miles of trail and roads. If we only account for the miles of usable roads reported in the EA, then the maximum amount of new trail that could be constructed would be 4.5 miles of trail. While the Winter Range Management Area only encompasses 30 – 40 percent of the project area, OHA sees this as a significant impact.

The EA document itself recognizes this with the following information:

*Wisdom et al. (2018) determined that elk avoid non-motorized trail-based recreation, similarly to their avoidance of roads open to motorized routes on public forests. These avoidances represent habitat compression for this species, which is a form of habitat loss for these wide-ranging species (Wisdom et al. 2018). Flight distances of elk due to mountain bike use were observed on average around 900 feet (Wisdom et al. 2018). Therefore, during the use of trails intersecting the 38-acre block of elk security, this area would not likely serve as secure habitat.*

*In addition to impacts to habitat suitability, non-motorized recreation also alters activity budgets and  
movements of elk (Miller et al. 2020). Naylor et al. (2009) found the amount of time elk spent resting  
decreased when they were subjected to disturbance from mountain biking and hiking, while travel time  
for elk increased the most following exposure to mountain biking, followed by hiking and horseback  
riding.*

The project references restrictions near active elk calving sites, but lacks specificity on how this will be evaluated and implemented. The current Ochoco National Forest Plan (1989) states that the Forest is to “protect the character of elk calving sites. Minimize disturbance from human activity during calving season (May 15 to June 30) and protect wallows during rutting season (September 1 to October 15).” The EA fails to identify how it will monitor for and protect these areas.

OHA has other concerns with the proposed project such as biking during rutting seasons, and interruption of summer grazing patterns that could impact elk herd performance. OHA also believes the proposed project does not adequately address other indirect impacts to wildlife, such as introduction of invasive species from both construction disturbance and subsequent mountain bike use. The current Ochoco National Forest Plan calls for the Forest to provide forage sufficient to meet management objectives for population levels of Rocky Mountain elk and mule deer. Monitoring for, and discussing how the Forest will address the introduction and subsequent impact of invasive species on native forage sources should be addressed.

**Hunting:**

Hunting on the Ochoco National Forest is perhaps one of the longest recreational activities within the forest and is part of the custom and culture of our membership. Hunting in the Grizzly Management Unit begins in mid-August and runs through December depending on the type of tag the hunter holds. This area of the Grizzly Unit is popular among hunters due in part to its accessibility. OHA believes this recreational user conflict has not been adequately addressed. The EA does not evaluate impacts to hunting and fails to address human safety issues associated with the overlap of hunting seasons and season of use of the trails by mountain bikers.

If the Forest does decide to move forward with one of the Alternatives (2 - 6) we strongly recommend that the Forest starts small and monitors all of the impacts to wildlife. If it’s demonstrated that the Forest isn’t monitoring, or lacks capacity to do adequate monitoring, then no more expansion of the trail system should take place, and actions should be taken to close the trail system until adequate monitoring is executed. By starting small, the Forest could also gauge actual user days.

Thank you for the opportunity to comment.

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