19 Dec 2022

TO: Beth Peer, Environmental Coordinator, Ochoco National Forest

VIA: <https://cara.fs2c.usda.gov/Public/CommentInput?Project=58831>

**Subject: Lemon Gulch Trail System EA — comments**

Please accept the following comments from Oregon Wild concerning the Lemon Gulch Trail System EA, <https://www.fs.usda.gov/project/?project=58831>. Oregon Wild represents 20,000 members and supporters who share our mission to protect and restore Oregon’s wildlands, wildlife, and water as an enduring legacy. Our goal is to protect areas that remain intact while striving to restore areas that have been degraded.

The proposed action is to build 19-51 miles of mountain bike trails, partially within big game winter range.

We thank the FS for working with the proponents of this trail system to scale back the proposal and mitigate some of the adverse effects.

In our view, Alternative 3 might represent a more appropriate balance of competing interests, allowing some new mountain biking trails while maintaining substantially larger average patch size of core habitat.

Mountain bike trails can have significant effects on wildlife.

We found that in the disturbed (i.e., high-recreation-level forests) the density of birds and species richness were both reduced at points close to trails when compared to points further away (−13 and −4% respectively), whereas such an effect was not statistically discernible in the forests with a low-recreation-level. … [W]e found a negative effect of recreationists on the avifauna of forests which have been used for recreation for decades suggests that habituation to humans has not been able to outweigh the negative impact of human disturbance (Bötsch et al., 2018).

Bötsch, Tablado, Scherl, et al 2018. Effect of Recreational Trails on Forest Birds: Human Presence Matters. Front. Ecol. Evol., 12 November 2018 | <https://doi.org/10.3389/fevo.2018.00175>, <https://www.frontiersin.org/articles/10.3389/fevo.2018.00175/pdf>.

The NEPA analysis should consider the insights from the nearby Deschutes NF that may help identify mitigation alternatives. L. Turner and B. McCormick, 2016. Deschutes National Forest, Trail Analysis Process for Wildlife Resources. There is also a related conference presentation, B. McCormick, L. Turner. 2018. Recreation Disturbance and Wildlife: Analyzing Impacts and Balancing Values. <https://ecoshare.info/wp-content/uploads/2018/06/9-mccormick-and-turner.pdf>; <https://www.youtube.com/watch?v=UruL5rihZ5c>. This resource recommends careful analysis of core habitat patch size, and connectivity.

The EA says the average patch size in the project area is currently over 250 acres, indicating pretty good habitat. Reducing that to an average patch size of 73 acres under preferred Alt 6 would represents a significant effect. In fact, the EA says that Alt 6 would reduce the average patch size by more than 200 acres!

Related to patch size, the EA says that connectivity between patches of core habitat is a key issue for analysis but the EA does not conduct much of an analysis of that issue. Even the Wildlife BE seems to lack a meaningful analysis of this issue.

We hope the FS recognizes the multiple-use mandate on our public lands, and avoids enshrining livestock grazing as a preferred use of public lands. Livestock grazing still has significant adverse trade-offs on soil, water, botany/vegetation, fish & wildlife, watershed health, as well as recreation.

These trails should be strictly non-motorized. Emerging technology, such as e-bikes can cause greater damage to public resources (e.g., soil, water, wildlife, range, fire) and must be excluded.

We urge the FS to carefully consider cumulative effects of this proposal with other proposed projects in the area such as the Mill Creek timber sale.

We are concerned that lots of downhill mountain biking requires frequent use of aggressive braking which tends to cause soil erosion and water pollution. Downhill riding is also where a lot of injuries occur.

Trail/stream crossings must be avoided in order to remain in compliance with the INFISH mandate to not retard attainment of RMOs. Solid bridges at all stream crossings (with well-designed bridge approaches) might mitigate some of the adverse effects on soil, water, and fish.

See Miller, A.B.; King, D.; Rowland, M.; Chapman, J.; Tomosy, M.; Liang, C.; Abelson, E.S.; Truex, R. 2020. **Sustaining wildlife with recreation on public lands: a synthesis of research findings, management practices, and research needs**. Gen. Tech. Rep. PNW-GTR-993. Portland, OR: U.S. Department of Agriculture, Forest Service, Pacific Northwest Research Station. 226 p. <https://www.fs.fed.us/pnw/pubs/pnw_gtr993.pdf>.

Each substantive issue discussed in these comments should be (i) incorporated into the purpose and need for the project, (ii) used to develop NEPA alternatives that balance tradeoffs in different ways, (iii) carefully analyzed and documented as part of the effects analysis, and (iv) considered for mitigation.

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Sincerely,



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