

USDA, Ochoco National Forest, Lookout Mountain Range District
Lemon Gulch Trails Project Draft Environmental Assessment
Public Comment Letter
12/18/2022

Dear District Ranger Slater R. Turner,

I am writing in support of the Lemon Gulch Trails Project. The analysis within the environmental assessment (EA) did not report any significant impacts because of the action alternative, therefore you should select Alternative 2 which contains the greatest quantity of trail miles.

The Lookout Mountain Ranger District is not meeting the objectives of the Ochoco Land and Resource Management Plan (LRMP) because the LRMP envisioned a total of about 486 miles of non-motorized summer trails. There are currently 156.5 miles of non-motorized summer trails. While the Lemon Gulch proposal does not satisfy the 311-acre deficit in non-motorized summer trails, the project does demonstrate that the Lookout Mountain Ranger District intends to move closer to compliance with their LRMP. Due to the 311-acre deficit selection of Alternative 2, which contains the greatest quantity of non-motorized trail is the most reasonable choice.

The Multiple-Use Sustained-Yield Act (MUSY) authorizes and directs the Secretary of Agriculture to develop and administer the renewable resources of timber, range, water, recreation, and wildlife on the national forest for multiple use and sustained yield of products and services. The Lookout Mountain Ranger District has provided for timber, range, water, and wildlife. As stated in the EA, there are 156.5 miles of non-motorized summer trails when the LRMP envisioned 468 miles. That is an approximate 311-mile deficit. The Lookout Mountain Ranger District is in violation of MUSY by not providing adequate multiple use opportunities for recreationists. Of the 157 miles of designated non-motorized trails, mountain bikes are prohibited from 44 miles or 28% of the designated non-motorized trail system.

The analysis within the EA demonstrates potential conflicts have been reduced. Based on disclosures in the EA, the Lemon Creek Pasture, where a majority of the trails are located, is typically used for a six-week period from early May to late June and nearly all fence crossings have been eliminated. This clearly demonstrates an understating of resource interactions and proves the Lookout Mountain Ranger District can provide for multiple use and sustained yield of products and services as required by MUSY. Under MUSY the Forest Service is right to consider other activities, besides grazing, in occupied allotments, including multi-use trails. The Forest Service has taken measures to reduce potential conflict between livestock and other users, specifically selecting an area which is used early in the grazing season and for a relatively short six-week rotation.

There are members of the community who have voiced opposition to the Lemon Gulch Trails Project. Those in opposition of the project seem to forget that national forests are federal public lands open to all members of the public regardless of where they live. Living near public lands does not give them more of a voice or control over public lands. The Forest Service is required to comply with their LRMP and other laws such as the MUSY. Providing use opportunities for all members of the public, so long as those uses are compatible with the LRMP, is the duty of federal land management agency. It is unclear how fulfilling Forest Service mandates changes people's way of life as alleged by some.

Not authorizing and implementing the Lemon Gulch Trails Project would be a clear violation of the stated purpose and need for the project. One of the stated needs for the project is the avoidance and proliferation of user-created trails, not authorizing one of the project action alternatives may cause the proliferation of user created trails in violation of the purpose and need for the project. In addition, not authorizing the project would violate the stated purpose and need to provide for a built mountain bike system that is easily accessible, not authorizing could cause impacts to important summer range wildlife habitat, and possibly increase or concentrate user conflict. Therefore, not authorizing one of the action alternatives would violate the stated purpose and need and would not improve experiences and safety for equestrians and hikers in the area. A lack of designated mountain bike trails may lead to a proliferation of user created trails which could violate the standards and guidelines from the LRMP. The Lemon Gulch Trail Project was screened for resource concerns and avoids sensitive riparian areas, etc. and therefore protects public health and safety.

I am advocating for the selection of Alternative 2 because it best meets the purpose and need of the project. Alternative 2 best meets the purpose and need of the project because:

Purpose and Need Element	Alternative and Why?
Demonstrated interest in new trail miles for mountain biking within the Ochoco National Forest	Any action alternative, although Alternative 2 was designed by Ochoco Trails and Central Oregon Trail Alliance and their investment shows a committed and dedicated interest
LRMP objective that a managed trail system be provided for a variety of uses including mountain biking	Alternative 2 best meets this portion of the purpose and need because it contains the greatest quantity of trail miles. The ~52 miles of designed and built mountain bike trails assists in meeting the LRMP objectives more than any other alternative
Wide gap between the LRMP objective of 468 miles of non-motorized summer trails and the existing 156.5 miles and there are currently zero miles of trail designed and built for mountain bikes	Alternative 2 best meets this portion of the Purpose and Need because it contains the greatest quantity of trail miles. At 52 miles of trails Alternative 2 provides 73% more trails than Alternative 5 with 30 miles of trails. Alternative 2 contributes the greatest quantity of trail miles which best contributes to the LRMP objectives. Alternative 2 best meets the purpose and need of the project. Of the 157 miles of designated non-motorized trails, none have been designed and built specifically for mountain bike use
Avoid a proliferation of user-created trails by providing an opportunity that is properly designed and located	With ~52 miles of trail, Alternative 2 would likely best reduce the proliferation of user-created trails because it would provide the most riding opportunities
Provide a properly designed and built mountain bike system that is easily accessible, avoids important summer range wildlife habitat	Any action alternative

Purpose and Need Element	Alternative and Why?
Provide loops, downhill riding opportunities, and new milage designed and managed for mountain bike use	Alternative 2 best meets this portion of the purpose and need because it provides the most connected loops, downhill riding opportunities, and new milage of designated and managed trails for mountain bike use
Provide various levels of accessibility and trail difficulty to suit a wide array of people	Alternative 2 provides the greatest levels of accessibility and trail difficulty. The ~52 miles would suit the widest array of people
Draw and more evenly distribute current and future mountain bike use away from other areas such a Lookout and Round Mountain to minimize interactions with other users and improve the experience and safety of equestrians and hikers those areas.	With Alternative 2 having the greatest quantity of trails and being specifically designed for mountain bikers, it is assumed that use would be concentrated to the new Lemon Gulch area and away from Lookout and Round Mountain which would meet the need of the project to minimize interactions with other users and improve the experience and safety of all users

I urge you to decrease the years of monitoring needed prior to the subsequent phases of construction. It is reasonable to assume that potential negative effect would be present after one year and monitoring need not be extended for two years. It would also be best to construct a greater quantity of trials during the first phase of construction. Often during land management activities, it is difficult to predict future staffing and funding levels which may decrease the Lookout Mountain Ranger District’s ability to monitor the project. Failure to monitor the project would result in delayed implementation of future construction phases, and could potentially result in fewer construction phases, this is why it would be best to construct more trail during the first construction phase.

I look forward to expanded recreational opportunities on the Lookout Mountain Ranger District. I appreciate the thoughtful and well-reasoned Lemon Gulch Trails Project environmental assessment.

Thank you for your consideration,

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