



December 17, 2022

Mr. Shane Jeffries and Mr. Slater Turner  
C/o Ms. Beth Peer, Environmental Coordinator  
Ochoco National Forest  
3160 N.E. 3rd Street  
Prineville, OR 97754

RE: "No Action" alternative for Project #58831

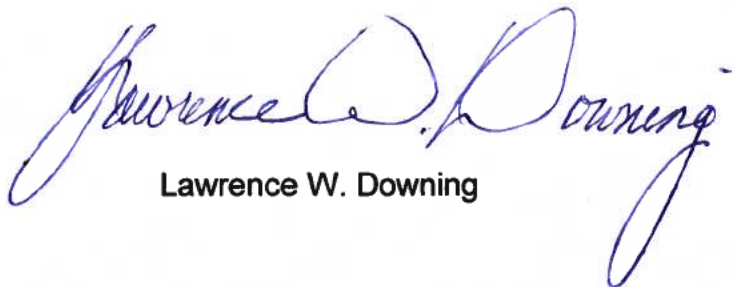
This letter is to register my objection to the Lemon Gulch Trails Project #58831. The "no action" alternative should be selected.

The following are some of my comments and questions regarding the Lemon Creek watershed bike trail project as proposed in the recent draft Environmental Assessment (EA).

- The Grizzly unit of the Ochoco National Forest is used by many elk and deer hunters. Based on what is posted in the EA the proposed trails (both their construction and utilization) would impact elk and deer populations in the Grizzly unit. The fragmentation of elk and deer habitat is recognized in the EA but justifies the fragmentation by saying that the animals will move to other areas. This leads to the question: "Why destroy an animal's range(s)?"
- Some people enjoy taking their dogs with them to hike or bike. Wouldn't this cause animals and birds in the wild to move out of the area of encroachment area thus fragmenting their habitat even more?
- Page 38 of the EA gives data from a recent Crook County road trip count on Mill Creek Road. The trip count was 300 trips per day and the data is also qualified by stating that it was not known where the trip count was taken and that an increase in traffic would be difficult to determine. Why did the proposal not evaluate how a bike complex would affect county road deterioration and replacement? How many additional road trips for the proposers of the bike trail project? I do not believe the 300 road trip count is reflective of even holiday/weekend road use; therefore, the omission of accurate estimates is troubling.

- In 2017, a onetime event called an “Eclipse” occurred in Crook County that should give an indication of what we might expect in the number of people that could be attracted to Prineville and the Mill Creek/Lemon Creek area if a major attraction were introduced into the Ochoco National Forest. The people came from all over the world for an event lasting only a few minutes. It was reported that up to 70,000 people attended the event held at Big Summit Prairie, a privately owned property. Fees were charged for camping and partying. There were vehicles backed up bumper to bumper for forty miles from Prineville to the area. They opened this area up to generate a profit and to cover the cleanup of the area when the event was over. Can you imagine the draw if there were no fees for camping? The Forest Service does not charge for camping and would not receive one thin dime to cover any damage caused by a large influx of biking enthusiasts/competitors. Who would be responsible for the cleanup? Since the biking community sends publications all over the world regarding their activities, we might expect from 1,000 to 5,000 to attend a highly advertised timed downhill competition on a “Black Diamond” course. Conjecture on my part? Perhaps, but conjecture is all the Forest Service has to back up their projections of attendance. Where would these people stay? Prineville does not have the capacity to house them. They would have to camp in the National Forest and there are not a sufficient number to campsites available to handle such a large number of people safely.
- Fire Danger: We are in the midst of a “1200 year drought” and the valley will again be a tinderbox when the small amount of snow we have melts. A number of these people will want to light camp fires and some of them will be smokers. It will take only one careless person to start a forest fire. Many will not be familiar with safety procedures in a highly flammable area. If a forest fire were to start in Mill Creek, the whole valley and beyond could go up in a major conflagration. Many homes would be lost. It would be difficult to evacuate people with only one way out!

Again, a “no action” alternative should be selected.



Lawrence W. Downing

Cc: Mr. Glenn Casamassa, Region 6 Forester  
Mr. Randy Moore, Chief, USDA-FS  
US Representative Cliff Bentz  
Oregon State Representative Vikki Breese-Iverson