

Data Submitted (UTC 11): 11/21/2022 8:50:59 PM

First name: Kim

Last name: Brannock

Organization:

Title:

Comments: Dear Slater Turner and the Ochoco National Forest,

I am writing in opposition of Lemon Gulch Trail, as a resident of Bend for ten years, long-time avid mountain biker and advocate for our wild spaces and its creatures I understand why this is being proposed but also see what has happened in Bend, and believe it's time to think more deeply about the future and limiting the amount of trails, the amount of access in the name of retaining healthy ecosystems.

I used to believe all human-powered sports were low to no impact, but in getting to intimately know this place, I understand that is not the case. In the Bend area our elk and mule deer have been on a dangerous and rapid decline as well as other wildlife, largely as a result of both recreation and development. I have watched recreationists demand more access and hold themselves above their impact, pointing fingers at other users. I have watched the deer and elk decline as user impact and numbers have dramatically increased. I have watched the trailhead at Phil's get larger and larger, more and more bikers, less and less wildlife.

I believe places have intrinsic value that should be conserved, we can look at Bend to see that rampant increased access has consequences. I have spent time hunting and hiking in the Ochocos, I can visibly see and feel that it is still a healthy eco-system, a place where you can still witness entire herds of elk if you are stealth and quiet enough, a place where antelope are still abundant and there are healthy herds of deer and other wildlife. Healthy eco-systems are priceless as we face into unprecedented climate change and population growth in Central Oregon. I believe in conservation of the places that we still have that feel wild and nurture wildlife.

I don't find it acceptable to reduce habitat for elk by 15%-16%, and it's not because I am a hunter, if I never hunted again I would feel the same. Riding new trails would be fun, but we have lost too much already. I also know from what I have seen once an area gets developed, it opens the door for more, trails keep getting added, and then parking areas get enlarged, it's a more more more once the door is opened.

"Informal Dog Closure in Spring Visitors would be strongly discouraged from bringing dogs to the trails until after July 1. This would be emphasized in informational materials and educational efforts. A Forest Order could be put in place if not voluntarily adhered to and issues are occurring and reported."

Strongly discouraging doesn't hold weight, if you are strongly discouraging it, dogs should not be allowed during that time frame, there's too much at stake to leave this up to users to decide. I have two dogs myself, but also I see their impact, they affect wildlife, and there's a growing dog-poop problem here in Bend, more users, more careless users, and a lot more poop left behind in plastic bags and out.

"the initial capacity at the main trailhead (lower trailhead) would provide room for about 20 vehicles on about 0.5 acre. At a maximum build out, the lower trailhead area would accommodate a maximum of about 35 vehicles and would require additional excavation."

We have seen this everywhere in Bend, people want what they want, if the parking isn't there they make it by driving off the side, widening roads, and constantly creeping into the vegetation, there are many examples of roads that even two years ago had almost no side pull-out with pull-outs everywhere.

"Additionally, dispersed camping is legal across the Ochoco National Forest and visitors may park and camp anywhere within 300' of open roads shown on the Motor Vehicle Use Map (MVUM) as long as they are not creating new disturbance to vegetation and the landscape. Several existing dispersed campsite sites in Lemon

Gulch area have fire rings already constructed by previous visitors; use is light. Sites along Mill Creek see higher use in the summer season. "

I didn't see anything indicating if camping would be prohibited in the parking lots. Light use would be likely to change as well as density of dispersed camping, have those impacts been considered?

"It is expected that some groups would bring two vehicles in order to shuttle, i.e. two or more riders could leave one car at the bottom trailhead and shuttle in one vehicle to the top. The inclusion of middle and upper parking areas is not intended to increase the amount of use the area will receive; rather it is intended to facilitate the shuttling of vehicles. It is expected that the middle trailhead would get the least amount of use. "

What we see in Bend are a large number of users and as a result all areas that may have been used more for shuttling in the past are now at capacity too on any given riding day. To say that these lots are for shuttling and will only be used as such is short-sighted. Once the area gets put on social media/popular as a downhill-focused trail network, a type of riding experience that is lacking in Central Oregon, it is likely to get a lot of pressure, it's not far from Bend, and it's short-sighted to not fully estimate the potential large amount of interested users.

" Mule deer populations have been generally declining across the western United States. This decline is evident in the Grizzly GMU as well (ODFW 2022b). In contrast, the elk population within the Grizzly 53 GMU has been steady over the last 5 years (ODFW 2022d). The current population numbers of both elk and mule deer are below the management objectives for the Grizzly GMU. However, when you consider the Ochoco National Forest is made up of more than one GMU, the combined population of elk across this landscape exceed the population objectives identified in the Forest Plan for this decade. In contrast, when considering the combined GMUs for the Ochoco National Forest, mule deer population numbers are below Forest Plan objectives. Elk and mule deer use the project area throughout most of the year."

All of the above are consistent with what I have observed and commented about above, I love mountain biking, but the health of the eco-system is more important. In the attached screen shot from the EA, it's not acceptable to me for core patch to be reduced from 264 acres, to 16 as planned in Alt. 2, this patch size is important for the vitality of wildlife and Lemon Creek is an important water source for the area that likely attracts and supports many animals, this massive reduction in patch size, while also holding an important water source could displace wildlife.

While my focus hasn't been on all of the wildlife that is at risk, the list in the EA shows the current health of the ecosystem by the sheer diversity of species living there, it is important for us to understand the intrinsic value of this as having importance too, economics and converting forests to dollars are not the only thing that matters.

I oppose a mountain biking trail system in Lemon Gulch, if one is approved I would strongly advocate for Alternative 3 or 4, and for thinking out more completely the camping regulations and impacts, as well as having trash cans placed at the site from the start, with a rule in place for no dogs during the key time period that the current EA strongly discourages it. I would also suggest some solutions for dog poop by having bags available at trailhead and signage about pet impacts in the area to wildlife.

Thank your for the time and effort you are putting into this, it's a big decision at a pivotal time for our region.

Kim Brannock

