

Data Submitted (UTC 11): 12/11/2022 12:54:52 AM

First name: Kim

Last name: McCarrel

Organization: Oregon Equestrian Trails and Back Country Horsemen

Title: Public Lands Rep.

Comments: We are submitting the comments below on behalf of Oregon Equestrian Trails (OET) and Back Country Horsemen of Oregon (BCHO). Both groups are all-volunteer 501(c)3 organizations that maintain trails and advocate for recreational equestrian use of public lands.

OET and BCH have been part of the Ochoco Trails group since its inception. We collaborated with the other members of Ochoco Trails to develop a comprehensive trail plan for the Ochoco National Forest that included, among other projects, a mountain biking trail system in the Lemon Gulch area. We continue to support this MTB trail network fully.

We are impressed with the comprehensive analysis the Forest Service has done on this EA. Unfortunately, some residents have seized upon Lemon Gulch as a symbol of the unwanted growth and cultural change occurring in Crook County. Emotions have run high, and we recognize that it hasn't been easy for the Forest Service to work in this environment. However, we applaud the thoroughness of your analysis of the Lemon Gulch project.

We are comfortable with Alternative 2, the original proposal. However, given the controversy surrounding this project and the impacts Alternative 2 may have on grazing permittees, we fully support Alternative 6, the Preferred Alternative, with several slight modifications, as noted below.

Alternative 6 provides most of the benefits Ochoco Trails recognized when we initially proposed the Ochoco Trails Plan. That is, it provides the biking community with purpose-built mountain biking trails near Prineville. It has significantly less impact on wildlife than the other areas we considered. And it may reduce the bike traffic on multi-use trails like Lookout Mountain that aren't safe for horses and bikes to share.

We appreciate that you intend to use an adaptive approach to trail development, constructing the trails in phases and evaluating the impacts between phases. We also appreciate your pledge to provide more monitoring and enforcement.

We suggest the following modifications to Alternative 6:

1. To prevent cross-overs between the Giddy Up Go, Green Mountain, and Lemon Gulch trails, please ensure that where these trails are near one another, they are visually screened. This is very important to the equestrian community.
2. Please reinstate the North-South arterial trail below the 3360 Road and above the creek to provide an easy trail all bike riders can use to return to the lower trailhead.
3. Please reinstate the short, easy trail near the middle of the network that was included in Alternatives 2, 3, and 4 but omitted in Alternative 6.
4. We appreciate your intent to limit the size of all races and special events to the number of participants the parking areas can handle. Please do not allow the race organizers to use the 3370 Road for staging.
5. If horses are allowed on the Lemon Gulch trails, please provide signage at both ends of all steep trails to indicate the trail is unsafe for equestrian travel.

We recognize that this may be outside the scope of the current EA, but the equestrian community is concerned about the impact the Lemon Gulch trails may have on Dry Creek Horse Camp and the Giddy Up Go Trails. Therefore, we would like to go on record as requesting that the Forest Service establish the following policies to preserve equestrian access to the Dry Creek area:

- 1.Out-of-area bike riders are likely to be interested in camping near Lemon Gulch. We would like to see camping at Dry Creek Horse Camp limited to campers with stock only.
- 2.Since Dry Creek Horse Camp doesn't offer day-use parking, many local equestrians park at Cow Cabin for day rides on the Giddy Up Go Trails. We would like to see overnight camping prohibited at Cow Cabin.
- 3.We would like to see bike riding prohibited on the Dry Creek Trails. These trails are steep and have many blind corners. If bike riding is permitted there, the area will no longer be safe for horseback riding.
- 4.The 3370 Road will need to be maintained more frequently to support the anticipated increase in traffic.

Thank you for your thorough analysis of this proposed project. We appreciate your consideration of our thoughts and ideas.

Respectfully submitted,

Oregon Equestrian Trails
Back Country Horsemen of Oregon