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Comments: I am writing in support of the Lemon Gulch Trails Project. I am a mountain biker and a lover of public lands, wildlife, and the natural environment. I am the Executive Director of the Central Oregon Trail Alliance (COTA) and a participant in the Ochoco Trails coalition; however, this is my personal letter. I also worked for a consulting firm as a NEPA analyst and project manager for 15 years.

Outdoor recreation is booming, in particular the popularity of mountain biking. Central Oregon is well known across Oregon and the U.S. as a hub for mountain biking. Central Oregon's trails have brought economic diversity and stability to our region and increased our residents' well-being and quality of life.

Planning for new trails is a long process. The members of the Ochoco Trails coalition worked tirelessly on the proposal that the Lemon Gulch Trails Project is part of since 2017-most of them volunteering their time. I applaud the Forest Service for taking action to move portions of the coalition's proposal through the NEPA process so that the deficit of trail-based non-motorized recreation opportunities in the Ochoco National Forest can begin to be addressed. As noted in the environmental assessment (EA), the 1989 Land and Resource Management Plan (LRMP) calls for 468 miles of trails, of which only 156.5 (33%) currently exist.

While I applaud the Forest Service for its work, the fact that only 33% of the trails envisioned in the 1989 Plan are on the ground 33 years later clearly demonstrates the need to do more to build trails in the Ochoco National Forest. Given that 33 years have elapsed since the LRMP was written and the demand for trail-based recreation has increased exponentially during that time, 468 miles is likely an underestimate of the true current need.

I am concerned that while the need for more trails is so clear, the Forest Service has still selected Alternative 6 (27.5 miles of new trail) as its preferred alternative. Selecting Alternative 6 would only increase trails provided as a percent of those envisioned from 33% to 39%. Alternative 2 (51.3 miles of new trail) is clearly the better choice. Even Alternative 2 would only increase trails provided as a percent of those envisioned from 33% to 44%, leaving a huge deficit remaining.

Given the length and complexity of the planning and environmental review process, the many citizens hoping for more trails will likely be waiting decades longer for those trails to become a reality no matter which alternative is chosen.

Any proposal for change seems to be inevitably met by some concern, and concerns have been raised about the Lemon Gulch Trails Project. Those concerns have been thoroughly addressed by the analysis in the EA and the effects found-rightly so-to be well below the threshold of significance. Other locations were screened during pre-NEPA, and Lemon Gulch was found to be the area with the least impacts on wildlife, grazing, and other aspects of the natural environment. The Lemon Gulch Trails Project has undergone a robust multi-stakeholder involvement and public outreach effort, and the EA demonstrates that effects on the human and natural environment would be minimal. The Forest Service should take full advantage of the work that has gone into this proposal and select Alternative 2. Furthermore, if the Forest Service doesn't choose Alternative 2, you will miss an excellent opportunity to use proactive planning to minimize further degradation of the non-motorized trail user's recreational experience on existing trails.

If the Forest Service won't implement Alternative 2 and approve the full 51.3 miles of trails at Lemon Gulch, where impacts on the human and natural environment are demonstrably minimal, how does the Forest Service ever expect to make substantial progress toward providing the needed trail mileage to meet the goals of your own LRMP?

As a NEPA practitioner, I believe the analysis overstates impacts on grazing. The analysis is written such that it lends unwarranted validity to surrogate buffers around water developments and salting locations and the comparison between alternatives that is based on them (Table 31, pages 77-78). As a mountain biker who has encountered cattle throughout the west, my personal experience indicates that these buffers overestimate impacts, especially in an area of ridges and valleys like Lemon Gulch, where two entities can be close in distance yet completely obscured from one another's sight and sound due to topography and vegetation. The EA provides insufficient basis for determining that Alternative 6 or any of the reduced trail mileage alternatives is superior to Alternative 2.

In addition, I have serious concerns about Appendix C, the Implementation and Monitoring Plan that is meant to field verify any grazing impacts. First, as written, the phased implementation would take nearly a decade, needlessly delaying the implementation of this project. The timeline for implementation should be reduced so that the purpose and need can be satisfied in a timely manner.

In addition, the plan in Appendix C raises questions about how it can be implemented in an impartial manner. Natural systems are influenced in complex ways by multiple factors, including temperature, precipitation, vegetation patterns, and much more, and thus exhibit natural variability over time. In addition, the project area is open to and is used by others, including hunters, campers, hikers, off-road drivers and more, so human disturbance would not be limited to mountain bikers. Logging is also planned for the area. It does not seem plausible that the Forest Service could use the plan as written to impartially determine that any changes noted are due to mountain bikers and not to other factors or a combination of factors. We therefore respectfully request that Appendix C be revised to assess only those variables for which impartial analysis is possible or removed if there is no way to assess such impacts reliably and impartially.

The Ochoco National Forest is compelled by compliance with Multiple Use Sustained Yield Act of 1960 and its LRMP to increase non-motorized trails. The pre-NEPA work that has gone into this project has shown that Lemon Gulch is the location with the least impacts on the key issues of grazing and wildlife; those impacts would be minimal to the point of being indistinguishable from natural variation. It would be a shame to waste this opportunity to provide a robust trail system and instead scale it back nearly 50% due to fear expressed by a small minority of people, most of whom are responding with fear to misinformation about the project's scale and impacts and the process that was followed.

Thank you for your consideration and all the work you have put into this project. Your efforts to balance multiple needs in the stewardship of our shared public lands are greatly appreciated.