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Organization: Central Oregon Trail Alliance

Title: Secretary

Comments: Dear Slater Turner and the Ochoco National Forest,

I am writing in response to the Environmental Assessment (EA) for the Lemon Gulch trail network in the Ochoco National Forest (ONF). This project is clearly a well thought-out and well-studied proposal that will help meet the current and future needs of recreation in the Ochocos, and it has many benefits for a variety of trail users and Crook County residents.

The EA for the project states that there are 156.5 miles of trails in the Ochocos, of which mountain bikers only have access to 112 miles, and the 1989 Land and Resource Management Plan (LRMP) calls for 468 miles of non-motorized trails. Thus, only ~33% of the trails called for in the LRMP have been realized. The full build of the trail networks proposed by the Ochoco Trails Coalition (OTC), including Alternative 2 for Lemon Gulch, is the best way for ONF to address this gap in the LRMP; satisfy the Purpose and Need laid out in the EA; and fulfill its mission to "meet the needs of present and future generations" while sustaining "the health, diversity, and productivity of the Nation's forests and grasslands."

While many critics of Lemon Gulch claim that "there are many areas" where the proposed trail system could be built, the ONF has already determined this to be false. The 2018 and 2019 outreach efforts by OTC presented multiple locations and asked stakeholders for feedback, then presented their plans for non-motorized recreation to the ONF for review. Through this process and through studies by the ONF, the other areas were eliminated, and Lemon Gulch emerged as the area with the greatest benefit and the least impact on wildlife and other natural resources.

Increased recreation use in the Ochocos is a completely predictable future: Trail conflict and crowding will be a certainty in the near term if additional trail opportunities are not implemented soon. The work of OTC represents years of dedicated planning and collaboration that has led to a proposal that can solve these issues. Mountain bikers are a fast-growing segment of users in the Ochocos; by creating this network of trails in an already heavily-used area close to town, we can maintain the wild and rugged nature of more remote areas in the Ochocos. Alternative 2's well-planned, viable alternative discourages mountain bike use elsewhere in the ONF.

Crook County and Prineville will also benefit enormously, from both economic and health perspectives. Having a trail network much closer to town means easier access for local families to get out and enjoy the forest, which will lead to a healthier population. Studies have shown that in Oregon alone mountain biking cuts \$26 million annually in healthcare costs. Mountain biking has also shown repeatedly in small towns around the country to add a significant boost to the economy. In Oakridge, Oregon, mountain bikers spend \$2.3-\$4.9 million every year. Prineville is in a perfect position to gain these advantages that tourism brings, without detracting from the small-town lifestyle that residents enjoy.

A few comments to the Lemon Gulch EA oppose the more-advanced mountain bike trails in Alternatives 2-6, instead advocating for road-use only or road-to-trails conversions. While cross-country style trails-like trail 23 in Alternative 2-are an important part of a mountain bike trail network, it is imperative to also include advanced trails-Objective 3 of the ONF in the EA-for several reasons.

First, a main goal of Lemon Gulch specifically and OTC in general is to reduce trail conflict elsewhere in the ONF, specifically on Lookout Mountain and Round Mountain (Tr. 804 and 805). Without several engaging downhill-oriented mountain bike trails-like 18, 28, and 29 in the EA-there will not be an incentive for riders to avoid Lookout and Round Mountains, thereby not addressing the growing user conflict there.

Second, having a trail network with a variety of trail difficulties allows a broader group to appreciate the same area. For example, a family might have kids at beginner and advanced skill levels, and by having the network in Alternative 2 the family could access terrain that suits each member's ability from a common start and end point, enhancing the inclusivity of the experience.

Third, there is a strong need for a full spectrum of trail difficulties for adaptive riders, especially advanced trails. Alternative 2 best addresses this need, with proposed advanced adaptive mountain bike (aMTB) trails 18 and 21 in addition to the aMTB trails 16, 17, 19, and 22. There may be additional opportunities for aMTB accessible trails in Lemon Gulch beyond those specified, and I encourage the ONF to support a tread width of 40" wherever possible to enable aMTB use, consistent with the universal design principles the Department of Agriculture has followed since the passage of the Americans with Disabilities Act.

Fourth, it is the more-advanced trails that most capture the rider's interest. People do not vacation to Oakridge for Salmon Creek Trail (#4231), but rather for Alpine, Dead Mountain, and Larison Rock Trails (#3450, #3566, and #3607, respectively). Alternative 2, with its full inclusion of advanced-skill trails, will not only lead to the most positive economic benefit to Prineville and Crook County, but will also encourage the most volunteer engagement-and associated benefit for all users-in the ONF.

Finally, I would like to emphasize to both the ONF and critics of Lemon Gulch that the mountain bike community is not monolithic, nor is it exclusive. We appreciate engaging with our natural lands, and many mountain bikers do so in a variety of ways. I for one hike, fish, camp, and ski, experiencing and caring for our shared public lands via the intimate relationship that stems from personal engagement with these lands. It is this broad appreciation of our lands that leads mountain bikers like myself to actively care for said public lands to the benefit of all. The over 15,000 hours COTA volunteers spend annually on our trails not only enhance the trail experience for equestrian riders, hikers, mushroom-hunters, and more, but by constantly learning and employing best trail stewardship practices we continually promote more sustainable recreation.

The positive externalities associated with the full Lemon Gulch build far outway the negative, and the Ochoco Trails Coalition and Central Oregon Trail Alliance are the organizations to assist the Ochoco National Forest in meeting its mission via Alternative 2 of the Environmental Assessment. Thank you for doing more than your due diligence with regards to this and other projects proposed by Ochoco Trails, and I encourage you to select Alternative 2 from the Lemon Gulch EA.

Best regards,
Ben Taber
Secretary, Central Oregon Trail Alliance