

Data Submitted (UTC 11): 12/19/2022 4:56:44 AM

First name: Andrew

Last name: Ross

Organization:

Title:

Comments: Lemon Gulch (Proposed) Trail System #58831

To Whom it may concern,

I am writing in regards to the proposed Mt Bike Park development in the Lemon Creek drainage.

I am a born and raised Central Oregonian, and have watched a lot of change happen here. I worked at Mt Bachelor for 13yrs and for the Forest Service out of the Bend Fort Rock Ranger District for 5Yrs on the trail crew, working Law Enforcement and Fire as well. I was on the Hash Rock fire in 2000 that burned 18,000 acres in the Mill Creek area. I was asked by my supervisors to find and stop the people responsible for building illegal trails in what is now known as the Phil's trail Mt biking area(Phil and friends were the one building the illegal trails). And I also put in many of the trail junction markers in that area after they decided to adopt the trails officially after pressure from well organized well funded Mt Bikers. The Forest Service has continued the trend of adopting illegal trails as official, I believe at least in part because they have no ability to enforce any rules around illegal trail building and also have had to shift from being supported by selling timber to being supported by recreation.

I grew up with a Mt bike and rode all over the woods on roads and trails. At the time you could get one a Costco for \$200 (an amount I was able to save up myself as a young lad) that would take you everywhere the fancy \$1000 bikes would. With little to no suspension available the speeds we rode at were compatible with other forms of trail and road use. Occasionally you might sneak up on an equestrian and talk through how to proceed with its rider but all in all we were just happy to be out in the woods taking it all in and there just weren't that many people out in the woods. As the population of the area grew so did the recreators and especially the Mt Bikers. The sport ballooned in popularity and so did the availability of suspension and cost of the bike needed to enjoy the trails the way they were being built. "Brake Bumps" became a thing, small at first as the suspension travel was only a couple of inches at most, but that required more maintenance and more suspension to enjoy the trails that were now seeing heavier use. "Mandatory Air" became a term describing spots on the trails where the rider must go off a jump as there was no way around the obstacle the trail builder chose to go over, more suspension needed. Currently googling "Best Mt Bike" will provide a list with the Best being around \$7000 and the "Budget Bike" being around \$2000 all with more than 4in of suspension travel front and rear. That is more suspension and cost than the motorcycle I was riding had when I bought my first Mt Bike. The trails in Phils trail area has an average grade of 2-3.5% that is about half of what the average grade would be in the proposed area.

Mt Biking is not what it used to be and we haven't even talked about Events and Shuttling yet. The Phils trail area is now unusable to anyone not Mt Biking (and on a multi thousand dollar bike), if you don't believe me take your kids for a walk on one of the trails and see how you are treated by the bikers regardless of the trail right of way rules. Areas that see this much use need more oversight that the Forest Service has the resources to provide. COTA plays at this but there only in for Mt Biking they do not use resources for much else. Mt Biking is now a sport for people with money. Driven by and industry selling the latest and greatest. Consumerism at its finest. Bigger steeper trails mean selling more bikes and parts.

I am opposed to Lemon Gulch Trail System #58831 for the following reasons.

There is no way to build "sustainable" trails as proposed. The terrain is too steep and erosion would be a serious

issue. There are grades as steep as 7% in this area. 7% is reaching the angle of repose for the materials that make up the Lemon Creek Drainage. Meaning no matter how you build the trails the erosion will be significant and continuous. And is not properly accounted for in the EA.

It will push out all other forms of recreation in the area as the speeds on these steeper trails will be too fast for anyone else to be able to enjoy the trail without risking an encounter with a high speed downhill rider. And the entire intent of the project is to "give" the Mt Bikers their own area. This is all of our land and no area should be exclusive to a particular user group. The EA acknowledges this but does not offer a real solution.

The Forest Service did not and is still not following proper protocols in the NEPA and EA process. They continue to work directly with the Mt Bikers and give no time to locals and other concerned parties. The EA directly dismisses concerns that have been tabled without actually looking at the impacts. Reading it feels like reading a justification of a bad decision that has already been made. Not like a document meant to inform people so that they can help decide what is in our own best interest. COTA is special interest group that has been given to much influence over a public institution.

Part of the reason this area was selected is because of the steep terrain and the access road to the top. Most of these trails will be one way downhill use in reality. If you are driving a motor vehicle to the top of the hill this is no longer a "non-motorized" sport. In the same way a ski resort is not the same as backcountry skiing.

This project needs to have EIS done because of the scale of the impact on the environment and people of the area. This is much more akin to a ski resort going in than it is a few miles of Mt Bike trails. But it won't provide actual jobs like a ski resort. The long term impacts of this project are much larger than what is suggested in the EA. With this terrain and shuttling it will draw in a lot more traffic than what is suggested in the EA. The EA directly dismisses the comparison to a ski resort. With shuttling and events that will inevitably be happening here, a small ski resort is the only comparable thing I can think of.

The EA incorrectly identifies the current amount of Traffic on Mill Creek road and 300 cars per day. I have never seen even 100 cars go by on any given day on Mill Creek Rd near the junction with Lemon Creek.

The reduced number of miles is a fake compromise. There is nothing stopping more miles of trail being built in the future and the plan by the Mt Bikers has always been to roll it out in phases. And the Forest Service doesn't have the manpower or ability to stop illegal trails going in and has shown in the past that they will just adopt them as legal after the fact. This is a clear play to get everything the Mt Bikers want and to not take into account the locals.

This project has been pushed mostly by people from outside the Prineville community.

The EA does not account for added sediment in Lemon and Mill Creek from the erosion that will occur. They are both spawning creeks.

Ochoco Trail Alliance has continually said they have support from other organizations that they do not have

support from and the Forest Service has taken them at their word.. They also present as a multi use group but they have little to no one involved locally or from user groups outside of mountain biking. Most of there members are from COTA.

The road up Lemon Creek is not wide enough to safely accommodate the amount of shuttle traffic that will occur.

The EA suggests there are no wolverines in the area but I have personally seen one in the Lemon Creek Drainage this year. As well as Bald Eagle nests on Mill Creek near where Lemon Creek comes in last year. I have also seen Golden Eagles in near the proposed area. There needs to be a proper assessment of the wildlife in the area done.

None of the alternatives offered look at putting the trail complex somewhere else. The only acceptable alternative is no action if you don't feel Lemon Creek is a good fit for this kind of large scale activity. All of the other 4 alternatives are basically the same thing, especially when you consider the Forest Service's inability to stop more trails being built once the trail heads are in. If we allow one trail here then all of the trails on the map will eventually be put in legally or not. This behavior is historical for the Mt bikers in Bend who are now pushing this project.

The EA states the trail tread to be 18in wide and that it will be built with a mini excavator. They don't make ones that are 18in wide therefore we are being misled on the actual trail width. And that becomes an exponential increase in the amount of erosion and compaction when you take into account what is required to build a trail on %7 grade a 32in wide trail will extend up and down the slope 20ft or more.

This project will not bring the economic impact suggested. Mt Bikers are like fishermen; they come with everything they need other than ice and maybe beer. Only the Forest Service will benefit from permits for parking and events.

The EA states "Most human-caused wildfires are related to camping. Though trail users may choose to camp in the Forest either at dispersed sites or developed campgrounds, those camping opportunities are already available to and used by the public" Again dismissing the concern and not addressing the reality that there will be way more camping in the area when these trails go in and that it will bring more people to there area that are from other area and therefore may not be as aware of fire danger as the locals who now use there area. All one has to do is go into the area around Phil's trail and see that there are many people camping and even living out there so they can ride every day.

The overall scope of what will be happening here in 10yrs is this project gets started now with 20 miles of trail or 50 is being drastically undersold. They are not painting the picture of the large scale events and down riders from all over the world coming to camp out and compete for a weekend, or the entire summer so the can ride them all.

The EA doesn't address any impact of shuttling which is a major reason this site was selected.