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Comments: December 19, 2022

Mr. Slater Turner
USDA-Forest Service
Ochoco National Forest
3160 NE 3rd Street
Prineville, OR 97754

Dear Mr. Turner,

Crook County thanks you for the opportunity to respond the Draft EA for the Proposed Lemon Gulch Trails Project #58831. Enclosed are some of the thoughts, concerns and comments we have in regards to this project proposal. Some of our comments are those that we have shared through this process with you already.

The Crook County Court, the board of commissioners for Crook County, has long valued the congenial, cooperative working relationship it has enjoyed with you and your colleagues at the Forest Service. We appreciate all the effort you have employed to keep our public lands beautiful, vibrant, and open to all Americans. In 2017, Crook County adopted its Crook County Natural Resource Policy. The policy, developed with the citizens of Crook County, serves as the guide for the County's interaction with local, federal land management agencies.

In the matter of Lemon Gulch, perhaps the County's greatest concern involves the process by which any decision is ultimately made. In particular, our concern is that members of the public who wish to speak on the proposed trail system, be afforded that opportunity. This applies particularly, but not only, to those members of the public whose businesses, private property, or use of the Forest might be affected by the establishment of the biking trail system that is being contemplated.

Whatever the decision may end up being, the involvement of these concerned and impacted citizens would be essential to ensuring there is a fair decision-making process.

As stated in our policy, the use of public and federal land is critical to the health, safety, welfare, quality of life, and economic stability of Crook County citizens. The Court recognizes the inherent natural beauty and the quality of life afforded to the citizens and visitors to Crook County. The Court has committed to the following principles to help guide decision-making regarding the management of natural resources within the County:

1) Expansion, revitalization and continuation of multiple uses on all federal lands in Crook County.
2) Multiple-use shall be inclusive rather than exclusive, thereby avoiding pitting one use against the other.
3) The multiple-use principle as defined in FLPMA and NFMA should strongly guide agency decisions.
4) Maintain flexibility in all plans to allow for extraction of natural resources from federal lands and to continue to use existing resources in accordance with all laws.
5) Protect and preserve the following rights of all County citizens, including:

* Private property interests, such as water rights, livestock grazing, and

access to lands, which have ties to federal lands;
* Traditional economic structures in the County that form the base for economic stability and protection of the tax base;
* Historic custom, culture and values of the local people; and
* Enjoyment of the natural resources of the County.

As expressed in our letter to you on October 6, 2021, the County Court was concerned that there were individuals who were likely to be impacted by the proposed Lemon Gulch Trail project who, at that time, had not been consulted. In April, 2022, the County Court requested Coordination with the Ochoco National Forest on this project. The Court believes that through Coordination, many of the issues identified in this letter would have been alleviated.

Having reviewed the EA, the County believes more strongly than ever that the best way to proceed prior to the adoption of a Lemon Gulch Trail Project is to conduct a Forest-wide planning process examining the impact and location of the expanded, non-motorized trail systems, especially involving the gathering of public input.

Forest-wide trail planning: During scoping, the Forest Service received numerous comments from the public that the Forest Service had not conducted any public process that would lead it to understand the needs of the Forest users when it came to expanded recreational opportunities, and in this case, the develop of trails to meet the Forest Service goals set forth in the Ochoco Forest Plan (1989). The Plan anticipated and called for expanded trail development, but the Plan lacked specificity and could not have anticipated the different types of trails that would be requested some 33 years later. Trail systems at the time of Plan's adoption were pathways in which users could travel through the Forest, enjoying the tranquility and scenery that it had to offer. It anticipated creating a system of trails that was available for the shared use of all users (hiking, mountain biking and trail riding by horse). Forest planners at the time did not envision requests to create high-density mountain bike trail parks that would feature structures and trail design that would challenge the best of the best mountain bikers, and so, necessarily, the planners could not have anticipated the potential ecological impacts and possible conflicts with other forest uses created by such high-density, high-skill level features.

In the letter of October 6, 2021, the County asked the Forest Service to stop planning efforts on Lemon Gulch and to begin a process that would discuss the opportunities to expand non-motorized trails across the forest, discuss the best locations for those new trails and most importantly, to justify the purpose and need for the new, higher impact use being proposed. Now that the EA has been issued, the County is even more convinced that important details have been overlooked, and additional public involvement and scientific analysis would greatly improve the health of the Forest.

Consistency Review with Forest Plan: Project planning must be consistent with the current Forest Plan for the. If a proposed project is not consistent with the existing Forest Plan, then, in order to appropriately analyze the harmful consequences before they arise, a project must utilize the EIS level of planning to amend the Forest Plan. The Ochoco Forest has a long history of staying consistent when development its projects.

In this instance, however, we are concerned that there are several things within the Project EA that are inconsistent with the Ochoco Forest Plan (1989).

First and foremost is that a large part of the project area designated General Forest Winter Range (MA-F21). Under this management area designation, the density of trail and road is not to exceed 3 miles per section. In the EA (pg. 115 and 116) existing road mileage is reported to be 11.17 miles of usable road and 4.38 miles of custodial care roads (closed). If the project area is approximately 3,300 acres in size, then it encompasses approximately 5.2 sections. Under this management area designation, that would allow for a maximum of 15.6 miles of trail and roads. If we only account for the miles of usable roads reported in the EA, then the maximum amount of new trail that could be constructed would be 4.5 miles of trail. We recognize that the Winter Range

Management Area only encompasses 30 - 40 percent of the project area. However, we also believe that the Forest Plan did not contemplate a high-density trail system (greatly exceeding the 3 miles/sq. mile limitation) adjoining such critical wildlife habitat. In implementing this standard within the general winter range, we assume that the Forest would also create a transition zone next to it that would allow for a gradual increase in road and trail density. None of the Alternatives reviewed discussed this density limitation. It is the County's recommendation that the Forest Service develop and review a project alternative that incorporates this limitation in its trail design and modify to review all alternatives where the standard is exceeded.

Citations: The EA makes multiple references to a final, approved Mill Creek Vegetation Management Plan. At present, there is no such final, approved document. This particular project has only been scoped by the public and the Forest Service has not yet completed its analysis of impacts and published a draft NEPA document or issued a final decision. Crook County is concerned that the Forest is making decisions about potential impacts of this project, based on potential decisions that have not yet been made.

Recreation Goals (Forest Plan Chap 4, Section 1, pg. 4-25): Fifty Years and Beyond: Most developed recreation sites will have completed construction and reconstruction and will be under a fee structure to recover maintenance costs. The EA discusses the use of volunteers for current construction and maintenance, but makes no mention of long-term maintenance, and does not adequately address the consequences if there are an insufficient number of trail maintenance volunteers. The Standards and Guidelines section (pg. 4-183) promotes backcountry recreational opportunities for hiking, horseback riding and mountain biking within applicable management areas MA-F8 (Rock Creek/Cottonwood Creek), MA-F11 Lookout Mountain Recreation Area, MA-F16 Bandit Springs Recreation Area, MA-F27 Round Mountain National Recreation Trail. However, there is no mention of MA-F21. The County asks that these matters be addressed.

Wilderness: The Mill Creek Wilderness is within 2 miles of the project area. Due to this close proximity, the EA should discuss the possible impacts on wilderness experiences. For instance, the Standards and Guidelines for Mill Creek Wilderness limit both numbers of encounters per day, and group sizes per day (Pg. 4-184). If the proposed high-density trails are developed in Lemon Gulch, additional traffic to and use of the area has a significant
chance of increasing visitors to the Mill Creek Wildness, which may then create the need for Forest Service to adopt management (permit systems) seen on other forests to limit access. If this is a possibility, the impacts, and how to mitigate such impacts, caused by the new trail system on the Mill Creek Wilderness ought to be examined.

Impacts to existing trails: The EA did not address the close proximity to the Green Mountain Trail or the Giddy-up and Go trail. These historic trails offer the user a unique experience. The close proximity of the Lemon Gulch complex of trails being proposed will significantly change the character of these existing historic trails.

Transportation (Forest Plan Pg. 4-224): This section proposes that roads and trails to be at the lowest density that meets long-term resource needs, and for the Forest Service to coordinate with the State and Counties on management of their roads to complement Forest uses. Unfortunately, conversations with the County Road Master in regards to the project did not occur. As of this date, the Forest Service has not utilized the benefits of coordination with the County. The EA (pg. 38) reports that a recent road count conducted by Crook County stated there is an average of 300 trips per day on Mill Creek Road and the location of the count made it impossible to know how many trips could be attributed to residents travel versus people headed into the Forest. The County Road Master reports (phone conversation) the 2021 study is the most current road study. Counters were placed at the intersection of Hwy 26 and Mill Creek Road and also at the end of the pavement on Mill Creek Road. The Road Master's conclusion of the data is that the majority of current road traffic is by residents of Mill Creek. Counts were 385 at the beginning of Mill Creek (Hwy 26) and 117 at the end of pavement. The construction of facilities and trail use analyzes up to 35 parking spaces at the lower parking lot, 20 spaces in the middle parking area, and 25 spaces for the upper parking lot for a total 80 spaces. This amount of planned

parking would at least double vehicle traffic on the graveled section of Mill Creek Road with no plan for road maintenance.

Trail systems or complexes like this project proposes are not addressed within the Ochoco Forest Plan (1989). Page 27 of the EA states that the trail complex will include within areas and with the steepest grades with multiple natural, enhanced natural, and constructed features. The focused objective is "Challenge," often associated with very difficult ratings (black diamond) while in other locations such as lower grades and cross-country trails, the objective is "Play" often affiliated with lower risk and easier trails (green circle). The Forest Plan did not envision or identify trail complexes of this size and scope.

While the Plan addresses the need for additional non-motorized trails across the forest for all user types (hiking, horseback riding and mountain biking), discussion of trails for the highly developed tread building and skill levels for thrill seekers was non-existent. Since this is a new use, with unknown impacts (multiple times stated in the EA that information is not available for analysis so opinion was used instead) the County believes this analysis should have been done at the EIS level.

EIS Requirements: This project should have been analyzed utilizing the following definitions within NEPA guidelines.

§1508.27 Significantly
(a)Context. This means that the significance of an action must be analyzed in several contexts such as society as a whole (human, national), the affected region, the affected interests, and the locality. Significance varies with the setting of the proposed action.
(b)Intensity. This refers to the severity of impact. Responsible officials must bear in mind that more than one agency may make decisions about partial aspects of a major action. The following should be considered in evaluating intensity:
(1) Impacts that may be both beneficial and adverse. A significant effect may exist even if the federal agency believes that on balance the effect will be beneficial.
(2) The degree to which the proposed action affects public health or safety.
(3) Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas.
(4) The degree to which the effects on the quality of the human environment are likely to be highly controversial.
(5) The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks.
(6) The degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration.
(7) Whether the action is related to other actions with individually insignificant but cumulatively significant impacts. Significance exists if it is reasonable to anticipate a cumulatively significant impact on the environment. Significance cannot be avoided by terming an action temporary or by breaking it down into small component parts.
(8) The degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources.
(9) The degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act of 1973.
(10) Whether the action threatens a violation of federal, state, or local law or requirements imposed for the protection of the environment. [43 FR 56003, Nov. 29, 1978; 44 FR 874, Jan. 3, 1979]

Once it is decided that a project has real or potential significant impacts, the Scope of the proposal must be determined as described in the Code of Federal Regulations (CFRs)
The size and density of road and trail development and need for this particular project, as a whole, are not

supported by the Forest Plan's desired future condition statements, either wholly or as broken out by management areas within the project area. The Forest Plan calls for a dispersed recreation forest, and describes it as such without any outputs related to concentrated, dense recreation parks/complexes of any type, nor does it describe outputs in the long term for developments like this proposal (1, 10) .
Road and trail density for much of the project area exceed the desired standards and guides for Winter Range and General Forest Winter Range (1, 10).
There is a lack of contemporary science to assess impacts, particularly for effects to the grazing allotments and the permittees ability to manage the allotment on the land and to have adequate herd production. There is not a similar project to compare this proposed development to the effects of the proposed development on the key issues of grazing and wildlife are not adequately addressed in the EA.
As described in the National Environmental Protection Act, "Significance cannot be avoided by terming an action temporary or by breaking it down into small component parts." The County is concerned that the current proposal effectively breaks down the inquiry into small component parts, and that the better level of examination is how this proposed trail development would affect the entire forest. The scope of the project is really a Forest-wide Recreation Trail plan, as these like projects, proposed at the same time should be analyzed together and contemporarily with the Mill Creek Dry Forest Restoration Project. The Direct, Indirect, and Cumulative impacts could then be examined at the appropriate level. (7)
§1508.25 Scope.
To determine the scope of environmental impact statements, agencies shall consider 3 types of actions, 3 types of alternatives, and 3 types of impacts. They include:
(a) Actions (other than unconnected single actions) which may be:
(1) Connected actions, which means that they are closely related and therefore should be discussed in the same impact statement. Actions are connected if they:
(i) Automatically trigger other actions which may require environmental impact statements.
(ii) Cannot or will not proceed unless other actions are taken previously or simultaneously.
(iii) Are interdependent parts of a larger action and depend on the larger action for their justification.
(2) Cumulative actions, which when viewed with other proposed actions have cumulatively significant impacts and should therefore be discussed in the same impact statement.
(3) Similar actions, which when viewed with other reasonably foreseeable or proposed agency actions, have similarities that provide a basis for evaluating their environmental consequences together, such as common timing or geography. An agency may wish to analyze these actions in the same impact statement. It should do so when the best way to assess adequately the combined impacts of similar actions or reasonable alternatives to such actions is to treat them in a single impact statement.
(b) Alternatives, which include:
(1) No action alternative.
(2) Other reasonable courses of actions.
(3) Mitigation measures (not in the proposed action).
(c)Impacts, which may be: (1) direct; (2) indirect; (3) cumulative.

Purpose and Need: The EA does an excellent job of discussing the purpose of this trail project (pg. 3). However, the EA does not meet its burden of showing the need for this particular trail project. For instance, what the "demonstrated interest" as outlined in the EA (pg.2), and how was it measured, are not adequately explained.

Crook County agrees that the Forest Plan calls for many more miles of non-motorized trails than what currently exists. While there is need established in the Forest Plan for additional recreation trails "across" the forest, to include mountain biking trails, the question here is whether there is a need for the specific type of high density, extreme challenge-rating mountain biking trails being contemplated in this action. User data, collected by ODFW, and anecdotal statements gathered by the Forest Service does not support the need for additional trails or parking or trailheads. The only need mentioned in the EA was to reduce user conflicts.
The need for "built for mountain bike" treaded, downhill, technical mountain biking trails with 35 vehicle parking/shuttle spaces is not adequately established in the EA, especially in light of the concerns for likely

impacts that such a high density development would cause to nearby property owners, grazing permittees, and the Forest as a whole. General demand in a sport or industry does not necessarily mean that there is a need to place such sport-or-industry facilities on the national forest. For example, if there is a demand for more pickleball courts, that does not equate to a need that such courts must be paved and established on the national forest. The important question is not whether there is a demand for such sport or industry, but whether the best place to locate those sports or facilities is at the proposed location. (1,2,4,5,6,10)
In summary, this proposed project's Significance and Scope, the anticipated and likely natural and human environment impacts, and the specific concerns voiced by users of the Forest, demonstrate that the current EA's depth and breadth are too narrow. A better alternative would be to undertake a Forest-wide EIS, studying the issues and effects of additional miles of dispersed non-motorized recreation trails on the Ochoco National Forest.
Soils and slope stability: The EA mentions areas within the project are steep (up to 70 percent slopes) and some trails will cross dormant or inactive landslide areas. In the 1990's, the Forest Service felt that the area was too steep and unstable to log with conventional ground methods, which necessitated the use of more expensive helicopter logging to manage vegetation. The EA mentions that dormant slide areas in the Doe Creek drainage area were reactivated in the early 2000's, and remained active for 5 years. The EA does little to address how the construction of trails across these areas may impact, exacerbate, or otherwise effect possibility of landslides. On steeper slopes, the contemplated trail width may require construction that once again destabilizes these slopes and landslide areas. Page 82 of the EA references Figure 13, showing these areas of concern. Figure 13 (references as the figure to show geological features) is actually an ownership graph (pg. 35).

Custom and Culture/Human Resources: The Ochoco Forest Plan promotes the concept of a dispersed recreational forest, in contrast to that of the developed recreational emphasis of the Deschutes National Forest. In the Ochoco Forest Plan, users share resources like trails with those interested in hiking, horseback riding, and mountain biking; trail development has not created or promoted one type of use over another. Instead, trail use rules apply to all users, which allows many different types of users enjoy the Forest and avoid confrontation and conflict . This project, with its proposal to build tread and unique thrill features, leads the Forest in the wrong direction. As stated at the beginning of this letter, Crook County strongly encourages the Forest Service to conduct a forest-wide analysis of non-motorized trail expansion. In that process, the Forest Service can gather public input in the changes wanted, needed or desired and weigh the consequences of those potential changes to what is the historical nature of the Forest.

Wildlife: As discussed above, the established MA-F21, General Winter Range Areas limit road and trail density would be limited to no more than 3 miles/square section. Because wildlife species move into and out of the proposed trail area, the EA discussed potential impact to canopy and hiding cover but does not discuss concerns of lost forage areas (ref Forest Plan pg. 4-245), risks leaving out important potential impacts. The EA doesn't adequately address impacts to wildlife as a result of the proposed trails increasing the degree of human presence in the project area. Research from the Starkey Project, a long term study of the impacts of human activities on wild ungulates (elk), shows that with increased human presence, elk remove themselves from the area. The EA's handling of this likelihood, which states that elk will simply move to another area of the Forest, is not an adequate review. Biking during elk rutting seasons, harassment during calving seasons, and interruption of summer grazing patterns impact herd performance and vitality.

Forest plan calls for the use of the Habitat Effectiveness (HE) standard. Pg. 4-246 of the Forest Plan (1989) states that the Forest is to "protect the character of elk calving sites. Minimize disturbance from human activity during calving season (May 15 to June 30) and protect wallows during rutting season (September 1 to October 15)." Also, it calls for the Forest Service to provide forage sufficient to meet management objectives for population levels of Rocky Mountain elk and mule deer. The EA does not adequately identify how it will promote these laudable goals in the face of the proposed, high-density development.

While a lot of the EA discussion on Habitat discusses the methods of determining HEI and other habitat measuring protocols, HEI determinations are not actually found within the EA. Questions such as what the

Habitat Effectiveness rating for the project area would be, are not addressed. The Forest Plan calls for all areas to score a minimum of 5 at the end of the 1st decade, 8 by the end of the third decade and a score of 32 by the end of the 5th decade. The Forest Plan is now in the beginning of the 4th decade.

The monitoring of wildlife impacts is not addressed for this project. This project should only move forward (implementation of the different construction phases) if it can be shown that impacts to elk and deer can be adequately mitigated. Dislocating elk is not an acceptable mitigation response. For state-level projects, ODF&W requires mitigation of equal habitat when it recognizes that a project will negatively impact critical habitat. The Forest Service should hold itself to this standard. We are concerned that this proposal is the first, and certainly not the last one which would develop new mountain biking trail complexes throughout the Forest. Without monitoring, how do you analyze the impacts for the construction of all phases or the evaluation of possible new proposals?

Grazing: Concerns about impacts to grazing by this high-density trail development are not adequately addressed in the EA. This includes a lack of science-based information regarding interactions between animals and bikers, or the examination of the impacts to animal performance and the lost economic value to the grazing permittees whose allotments are within the project area.

Because of the lack of science, the EA speculates trail interaction with water developments, salting grounds, and trails used to move the cattle from one area of the pasture to another or from one pasture to another. The EA establishes buffer areas as a surrogate method to evaluate trail development and grazing impacts. No references are given as to how these buffers were established, and there has been no citation to other studies which have examined
the use of buffers in other similar projects. The EA fails to evaluate changes on animal or herd-performance and behavior which would follow this type of development. The EA indicates that the permittees provided a map to the Forest, indicating areas of livestock use within the project area. The EA does not include that map and does not discuss how trail placement overlaps those use areas. Similar to wildlife, high trail density within a use area can significantly reduce livestock forage availability and utilization by forcing livestock out of the area. Loss of forage availability would be much greater than just the forage loss accounted for in the development of parking lots and construction of trails.

With lost forage, several things happen that are not accounted for in the EA. Animal performance is reduced, this is measured by lighter calves coming off the Forest. Cow milk production is suppressed and animals are less settled. Studies in Oregon show that when animals are stressed, significant declines in weight gain will occur. Calf weight loss can be up to 1 pound per day. If the permittee is running 350 cow/calf pairs, this is the equivalent of 350 fewer pounds per day gained, or 14,700 lbs. during the time (6 weeks) the cattle are in the pasture with this complex of trails. The resulting financial loss of this alone is approximately $30,000.

In addition, this disturbance of daily bikers causes the cattle herd to become more dispersed. As a result, the permittee is forced to purchase additional bulls in order for the cows to get bred in a set period of time. Where normally, a bull-to-cow ratio might be 1:20, if the project is developed permittees would need to maintain a 1:15 ratio. Bulls may cost an average of $3,000; and an additional 6 to 8 bulls would cost the permittee between $18,000 and $24,000 per season. Expenses such as this should be, but are not adequately, addressed in the plan's development. One way to mitigate these costs and impacts to livestock is to delay the use of the trails until the cattle are out of the pasture. The EA provides for seasonal closure due to elk calving, but dismisses the request to have a seasonal closure for livestock management. Having a seasonal grazing closure would be consistent for both impacts.

The EA does not adequately address trail user interaction with cattle, reporting one contact sharing information that fewer than 2.25 negative interactions per million visitors occur in their park. However, the types of bike trails found in this reported area are not the type of trails being proposed in Lemon Gulch and evaluated by this EA.

The EA (pg. 76) states that the trail complex, while being downhill, it is not "built specifically for speed". The fact is that much of the trail system, particularly the trails build for higher skill levels, are being built for speed. The educational trail kiosks mentioned as a method for informing trail users of the potential dangers is likely to be inadequate (appendix C). The EA states that the mitigation for user conflicts between mountain bikes and cows/horses/people in the Lemon Creek drainage would be user education. However, the EA states that user education has not worked on Lookout Mountain, and uses that to support the "need" for this project. If an informational kiosk has not been adequate at Lookout Mountain, there is every reason to believe it will not be adequate here.

Seasonal limitations on events should also be limited to time periods when livestock are not in the Lemon Pasture. This type of impact deserves greater attention before the project advances. Events, while mentioned in the EA are not adequately addressed. Recent biking events in Prineville (fall, 2022) had a hundreds of people in attendance. It is not uncommon to have hundreds if not thousands of people attend. Impacts to this area should be evaluated within the NEPA document. Impacts to the environment and human safety must be addressed. Impacts to transportation associated with events should also have been addressed.

Phased construction (appendix C) calls for monitoring of grazing utilization prior to additional trail phases being constructed. Monitoring relies on the ability of the permittee to meet grazing standards. The EA does not adequately explain how impacts of mountain biking interactions would be specifically differentiated from other issues which may result in grazing standards being or not being met. Other parameters must be included in monitoring including animal performance, changes in forage use areas, changes in herd management including herding issues, pregnancy changes, etc. The EA calls for the responsible persons to conduct this monitoring to be the recreation planner and the rangeland management specialist. The permittees or their representatives must also be a participating member of this monitoring team.

Hunting: Many local resident and visitors enjoy coming to the Ochoco National Forest to hunt; this is a cherished part of many family traditions, and an important aspect of the local economy. Hunting in the Grizzly Management Unit begins in mid-August and runs through December, depending on the type of tag the hunter holds. This area of the Grizzly Unit is popular among hunters due in part to its accessibility. The EA does not evaluate impacts to hunting that may be caused by this high-density trail development, and fails to address human safety issues associated with the overlap of hunting seasons and season of use of the trails by mountain bikers. No hunter wishes to endanger another person, and no trail user would want to interrupt the recreation of others in the Forest. To help avoid any conflicts, and allow both groups to enjoy the Forest, how these overlaps and interactions may be address should be examined in close detail before the project proceeds.

Conclusion:

In closing, the County wishes to convey that it intends to maintain relationships between the County and the Ochoco National Forest. It is always the desire of the County, through communication, cooperation and when appropriate Coordination, to work collaboratively for the preservation and enhancement of our natural resources.

This letter points out what the County believes to be many of the most significant issues in the project EA. Crook County believes as a result of these issues that the Forest Service should either chose Alternative 1 (no action) or, before a decision on the Lemon Gulch Trails Project is made, build on the work of this EA and conduct a Forest-wide non-motorized trail EIS that adequately involves the public and evaluates the impacts on wildlife, grazing, roads, site stability and is consistent with the Ochoco National Forest Plan.

We look forward to getting your responses to our concerns.

Sincerely,