



December 13, 2022

Ochoco National Forest
3160 NE Third Street
Prineville, OR 97754

Dear Slater Turner and Ochoco National Forest staff,


Central Oregon Trail Alliance (COTA) is a nonprofit with a mission to develop, protect, and enhance the Central Oregon mountain bike experience through trail stewardship, advocacy, collaboration, and education. COTA is well-respected throughout Central Oregon for building and maintaining quality trails and educating the public about responsible riding. The Lemon Gulch Trails Project presents one of the most promising and exciting opportunities in decades for Central Oregon mountain bikers. The project, if approved, is a top priority for COTA as an organization.

COTA's Crook County Chapter has been involved in the Ochoco Trails coalition since its inception in 2017. COTA's Prineville-based volunteers, who are also members of Ochoco Trails, designed the proposed Lemon Gulch trail system. COTA's Prineville-based volunteers were also closely involved in the development of the broader plan for non-motorized trails in the Ochoco National Forest of which the Lemon Gulch Trails Project is one part. We are excited for the opportunities the plan offers our friends in the hiking and horseback riding communities, as well as mountain bikers, and we encourage the Forest Service to move all portions of that plan forward without delay.

COTA is dedicated to building and maintaining trails in a responsible and sustainable manner, balancing the health of natural resources, such as wildlife, soil and water, and the continuation of multiple-use activities such as grazing and timber harvesting, with people's desire to experience public lands through recreational activities. We embrace the process of working with land management agencies and other stakeholders that is necessary to achieve this balance. The Ochoco Trails group is a shining example of collaboration between various stakeholders in the forest. It has successfully brought together many groups with diverse missions, including Oregon Wild, Oregon Equestrian Trails, Oregon Hunters Association and COTA. We feel that this project and this collaboration should serve as an example for future trail collaborations throughout the United States.

COTA is pleased and impressed by the thoroughness of the draft Environmental Assessment (EA) produced by the US Forest Service for the Lemon Gulch Trails Project. While the process has been long and some concerns have been raised, the EA clearly shows that the Lemon Gulch trail network is uniquely suited to help achieve the current and future needs of recreationists in the Ochoco National Forest and can be implemented in a manner that balances the needs of natural resources and multiple uses of the land.

The Ochoco National Forest published their Land and Resource Management Plan (LRMP) in 1989. According to this plan, the Forest Service foresaw a need of 468.6 total miles of non-motorized trails in the forest within the first two decades of implementation. The LRMP also specifically mentions mountain



bike trails as part of this. Currently, over 30 years after the LRMP was adopted, only 156.5 miles of non-motorized trails exist in the Ochocos. Suffice it to say, the Ochoco National Forest is not meeting the objectives for recreation set out in their own management plan. While the Lemon Gulch project would not fully address this trail mileage deficit, implementation of this project, and particularly Alternative 2, would be a meaningful step towards fulfilling the objectives of the LRMP.

Comments on the Purpose and Need

Of the alternatives presented, the No Action alternative would satisfy none of the objectives described in the purpose and need section of the draft EA, nor would it improve conformance with the LRMP. Of the five action alternatives evaluated in the draft EA, Alternative 2 best achieves all of the objectives described in the purpose and need, while the other action alternatives only partially achieve those objectives.

The following section presents each portion of the purpose and need in bold, with our thoughts following.

Need, page 2: "The project is needed because there is a demonstrated interest in new trail miles for mountain biking within the Ochoco NF and the Forest Plan [LRMP] has an objective that a managed trail system be provided for a variety of uses including mountain biking."

COTA, and our Crook County chapter, have proposed other trails in the Ochocos on multiple occasions over the last decade, showing a long term interest in more MTB trails near to Prineville. Most recently, prior to Ochoco Trails, was a proposal in the vicinity of the Lookout and Round mountain trails. This proposal was withdrawn by the Forest Service after the initial scoping received enormous opposition from various user groups and stakeholders. Mountain bike use is increasing dramatically on trails such as Lookout Mountain, Scotty Creek, and Cougar Creek. While all five action alternatives would be a step toward fulfilling the need for more mountain bike trails in the Ochocos, Alternative 2 is the only option expected to meet long-term demand in the Forest. Since multiple other locations have been proposed and rejected, if Alternative 2 is not chosen, how does the USFS expect to fulfill the objectives outlined in the LRMP for mountain bike trails?


Currently no trails in the Ochoco National Forest are managed primarily for mountain biking. Alternative 2 would fill this gap more completely than the other alternatives presented in the draft EA.

Need, pages 2-3, "There is also a need to avoid a proliferation of user-created trails...by providing an opportunity on the Forest that is properly designed and located."

User-made trails, from any type of trail-based recreation, are the byproduct of an area lacking sufficient opportunities and the types of experiences that users desire. This is true for OHV, ATV, hiking, equestrian, and mountain biking. Alternative 2 provides the broadest range of experiences and difficulties of all the alternatives, thus providing the best option to fulfill this objective. Other alternatives may fall short.

Purpose, page 3: "The purpose of the project is to provide a properly designed and built mountain bike system that is easily accessible, avoids important summer range wildlife habitat, and that meets the following objectives."

Alternative 2 was designed by local trail builders and is a well thought out, hub-style trail network. The specific location was chosen for easy access from Prineville and the multitude of already existing roads, as well as to mitigate wildlife concerns compared to other locations in the Forest where proposed trails



have been rejected due to resource concerns. COTA does have some concerns and suggested design modifications to the Forest Service's preferred Alternative 6, which are discussed later in this document.

Objective 1, page 3: "Provide loops, downhill riding opportunities, and new mileage designed and managed for mountain bike use."

Alternative 2 achieves this objective. The 50% or greater reduction in trails in all other action alternatives means each option is less than ideal for fully meeting this objective. For example, in Alternative 6, the omission of most of the pedal-accessed trails on the western side of the area means far fewer options for cross-country riders. Also, in alternatives 3, 5 and 6, many of the gravity trails are removed, meaning a reduction in a style of trail that is very sought after, yet virtually non-existent, in Central Oregon.

Objective 2, page 3: "Provide various levels of accessibility and trail difficulty to suit a wide array of people."

Certainly, the larger trail plan of Alternative 2 best achieves this as well. Any other alternative would incur a significant reduction in one difficulty level or another and may negatively impact the ability to provide for adaptive mountain bikes as well.

Objective 3, page 3: "Draw and more evenly distribute current and future mountain bike use away from other areas such as Lookout and Round Mountain to minimize interactions with other users and improve the experience and safety of equestrians and hikers in those areas."

Similar to the avoidance of user-created trails, the more robust the experience is in Lemon Gulch for mountain bikers, the less likely riders will choose to make a longer drive to ride existing trails in the Ochocos. Alternative 2 will provide the best experience and therefore best achieves this objective. If any of the other action alternatives are chosen, the mountain biking community will continue to petition for more trails.


Comments on the Alternatives

Each alternative, other than Alternative 2, falls short of meeting the stated purpose and need. The EA identifies Alternative 6 as the USFS preferred alternative so we will focus our comments on this option. If Alternative 6 is ultimately chosen for implementation, please consider the following:

Trail Design

As discussed above, Alternative 2 best meets all objectives in the purpose and need and COTA strongly encourages the USFS to move forward with that option. We have concerns about trail design in each of the other alternatives provided; however, since the Forest Service has indicated Alternative 6 as their preferred alternative we will focus our comments on this option.

The first issue with trail design in Alternative 6 is the removal/realignment of the North-South arterial trail below FSR 3360. The original trail layout designed this to be an easy green trail that all riders, regardless of ability or type of bike, could use to reach the bottom of the network. In Alternative 6, this has been moved to a position above FSR 3360. The terrain here is extremely steep, exposed and rocky and would risk rock and debris falling into road traffic. Additionally, it appears this would require riders to ride uphill to access this trail before descending to the lower trailhead. Riders on downhill bikes, or on aMTBs may not be able to do this. The result of this is that the middle trailhead could likely become the primary location for shuttling, as riders would simply avoid continuing down to the bottom of Lemon Gulch. The limited space available here makes this less than ideal. Removing this catch trail also removes the most accessible green/easy trail in the network and encourages more bicycle traffic down FSR 3360.



The second notable point on Alternative 6 is the omission of the short trail near the middle area of the network (yellow line on attached image). It is included on Alternatives 2, 3, and 4 and it does not appear that the EA identifies any specific environmental or resource concerns with this trail. It falls on an open ridge line that does not appear to have specific grazing concerns and is surrounded by other trails, therefore, would not fracture the existing wildlife corridors. While short in distance, we would recommend including this as part of Alternative 6. It is mapped as one of the easier trails and would provide another option for beginner or intermediate riders. Adding this trail to Alternative 6 is especially important if the green/beginner North-South arterial trail is not also added to Alternative 6.

Ways to Better Meet the Purpose and Need with Alternative 6

If the Forest Service chooses to move forward with implementation of Alternative 6, we would suggest that additional trails be added within the suggested trails, to create a higher-density trail network, while still covering a much lower total area than Alternative 2. With additional, shorter, connecting trails, Alternative 6 would get closer to achieving the goals in the Purpose and Need. A higher density, “braided” style of trail layout means riders can choose a different route each time they ride to achieve variability. Likewise, this would create more opportunity to build a wider range of difficulty into the trail network. At the same time, these trails would not significantly add to the cumulative effects of the project, as they would remain within the already defined corridors laid out in Alternative 6.

Trail Tread Width

Trail tread is discussed in the EA and is not specific to any alternative, but we wanted to clarify some of the specifications based on modern standards for trail design. The EA states that trail tread would typically be 18-24 inches, and that 36 inches was used in the calculation of the total area affected. Please note that adaptive bikes, which certain trails would be built to accommodate, require a trail tread width of 40 inches or more. Since other trails would be narrower, the calculation of total area affected using 36 inches seems accurate. Implementing universal trail design principles that accommodate a wider spectrum of trail users necessitates a wider trail within some scenarios. In addition, modern styles of mountain biking often use wider trail widths in turns, to stabilize features, and to provide multiple line choices so that a single trail can serve a wider range of rider skill levels.


Comments on Environmental Impacts, Implementation and Monitoring

COTA offers the following comments on the EA’s assessment of impacts and implementation and monitoring plans.

Magnitude of Impacts

The EA provides an extremely speculative analysis of potential impacts. All of the action alternatives, including Alternative 2, include a robust suite of resource protection measures (pages 10-12) that would minimize any negative impacts on the environment. These include the best management practices detailed in Appendix B; road and trail closure from December 1 to May 1 to protect wildlife winter range; and a phased implementation, monitoring, and adaptive management plan in Appendix C to address any impacts on grazing. These measures thoroughly address all resource concerns; therefore, it is not necessary to select a reduced mileage alternative (i.e., Alternatives 3, 4, 5, or 6) in order to further minimize impacts.

In fact, the scale of any of the action alternatives is so small in relation to the scale of the key resources as to likely render any environmental effects unmeasurable and indistinguishable from natural variability. For key issue #1, grazing, the project would affect a maximum of 18.7 acres (Table 5, page 20), while the allotment is over 51,000 acres. In addition, trails would be within 0.5 mile of only 4 water developments



out of 60 in the allotment. In addition, the analysis notes that there is no credible evidence that mountain bikers negatively impact water developments, or salt block usages at any distance. For key issue #2, wildlife, the trails and roads would be closed to protect winter habitat and the project area is not important summer habitat (as required by the purpose and need), so impacts on big game wildlife would be minimal under all of the alternatives.

Grazing

The EA uses buffers (distances of 0.5 miles for water developments and 0.25 miles for salting locations), as surrogates for environmental effects, while acknowledging that there is insufficient peer-reviewed data to quantify any actual effects of trails on grazing. As mountain bikers who have encountered cattle throughout the west, our anecdotal experience indicates that these buffers may 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. Given the acknowledged lack of sufficient data to support a quantitative analysis, it seems inappropriate to use Table 31, "Summary of trail miles in proximity of livestock grazing infrastructure" as a basis for choosing between the merits of the various alternatives when analyzing effects on grazing. The EA (and, by extension, available data) provides insufficient basis for determining that Alternative 6 or any of the reduced trail mileage alternatives is superior to Alternative 2. In addition, there are likely ways to modify proposed trail placement during implementation so that potential impacts on grazing could be further rendered unmeasurable or indistinguishable from natural variation without reducing the proposed trail miles.

Additionally, because the trails would be constructed over multiple years, we would expect the increase in human presence to be minimal in the first few years of development. This slow increase over multiple grazing seasons would allow cattle to habituate gradually, without an abrupt stress point. We would expect very little difference between the action alternatives in the number of riders that would visit the area, as any alternative with trails would attract some riders. Given the capacity of the proposed parking areas and the large area people and cattle would be distributed over, even at full build out, interactions between people and cattle would likely be minimal. Therefore, impacts on grazing would be unmeasurable or indistinguishable from natural variability.

We also have serious concerns about Appendix C, the Phased Implementation and Monitoring Plan. First, as written, the phased implementation would take nearly a decade, delaying the implementation of this project nearly beyond the time scale at which the NEPA analysis would remain valid. The timeline for implementation should be reduced so that the purpose and need can be satisfied in a timely manner.

In addition, the plan as written raises questions about how it can be implemented in an impartial, fact-based manner (p 77 in the EA and page 137 in Appendix C- Implementation Plan). Natural systems are influenced in complex ways by multiple factors, including temperature, precipitation, predation 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. In addition, logging is planned for the area. It does not seem plausible that the Forest Service could use the monitoring of livestock utilization at one monitoring site in the Project area to reliably determine that any changes noted are due to mountain bikers and not to these other factors. We therefore respectfully request that Appendix C be revised to assess only those variables for which there is a credible, established analysis methodology, or removed if there is no established way to reliably and impartially assess such impacts.

Forest Thinning

The EA indicates that logging is proposed in the Lemon Gulch area and is currently undergoing NEPA

analysis (Mill Creek Dry Forest Restoration Project #58081). If the timing of the logging is such that trails are built before it, we respectfully ask that reasonable protections for the trails be written into the commercial contracts and/or other treatment prescriptions, specifically to minimize destruction to the trail tread and retain trees adjacent to the trails to the extent possible. This would support trail sustainability by helping keep trail users on the trail, retain soil moisture, and minimize erosion.

Comments on Social Impact

While the EA clearly states there is no evidence of mountain biking having any type of negative social impact on a community whatsoever, we would like to reiterate this point, since the opposition has so strongly focused on this issue. Many, many small communities around the US are fortunate to have small trail networks like Lemon Gulch. All evidence points to mountain bike trails bringing great benefits to these communities. We recognize the fear of change is real, but we sincerely believe that any fear will be shown to be unfounded and much of the doubt about this trail network will in time be eased and eventually turn to pride in this great community asset. There are many trail networks that have followed this very path of skepticism, to pride. Examples are the Whiskey Run trails in Bandon, Oakridge's vast network of MTB trails, and Mount Emily Rec Area in La Grande.

COTA just celebrated our 30th anniversary this year. We are one of the oldest mountain bike trail building and advocacy organizations in the US. Over the last 30 years we have learned many lessons and grown enormously both as an organization and as a community of cyclists. We have proven ourselves to be strong stewards of the forest, community partners, and advocates for responsible recreation throughout Central Oregon. We are proud of the work we have done with Ochoco Trails on Lemon Gulch and we look forward to working with the Forest Service and the community to implement the Lemon Gulch Trails Project.

Signed:

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