First, I want to thank you for the opportunity to comment on the proposed Lemon Gulch trail system. I have been following the progress of this system and the work of the Ochoco Trails Collaborative for some time. As full disclosure, I am the Central Oregon Trail Alliance, Crook County Rep but I'm writing this comment as a Crook County resident and an avid mountain biker.

I would love to have a destination trail system so close to home. In other parts of the state and around the country these types of systems are not only good for the local economy but also reduce user conflicts by concentrating riding in a specific area. While I love the scenic, more remote trails in the Ochocos, concentrating more gravity centered riding in a specific area is a smart move.

It's no secret that the Central Oregon region is growing and outdoor recreation is a big draw. Many of the trails in and around Bend are crowded and barely able to keep up with the increased usership. I would love Lemon Gulch to take shape as a proactive step toward managing demand by taking pressure off other riding areas while helping the local economy.

This is a truly noteworthy project. It's similar to other unique, forward thinking Crook County solutions like the Wetland Park and Barnes Butte Natural area. One of the key differences is that this project shows true innovation with the adaptive trails proposal and true collaboration, being created out of the Ochoco Trails group. Lemon Gulch is a good idea that shows real initiative and is the right way forward for Crook County and Central Oregon.
This Lemon Gulch project looks great and will provide new riding opportunities for folks in Central Oregon. Please build it!
I am writing this in support of the proposed trail system. The overall experience the general area has to offer is robust. However, lacking a mountain biking area. I can identify many areas of hiking, horse back riding, hunting, fishing, camping. Other than a few trails, cannot identify a robust mountain biking area. This is overdue and very needed. Thank you for taking the time to consider this.
Comments:
I love the idea of developing trails outside of Bend. I live in Redmond and work in Prineville and really enjoy the opportunity for variety. I am a blue level rider, and this does appear to have some blue trails. I went there to be good downhill blue routes.
Thank you so much!
I think downhill mountain biking trails that are easily accessible by an access road would be a wonderful addition to the mountain biking trails that we already have in the area. We are experiencing a lot of growth as a community and more trails will help spread out the crowds. We currently only have Mt. Bachelor trails to do downhill mountain biking and the community would benefit from a free option. I think it would bring lots of tourists as well which will boost our economy.
Dear Forest Service,

I heartily support the proposed Lemon Gulch Trail System. This trail system will:
1) Support local need for planned mountain bike trails
2) Support the local economy through enhanced tourism and more attractive lifestyle for higher-paying employers
3) Reduce user conflict by having dedicated mountain biking/hiking trails
4) Reduce trail crowding in other nearby trail systems
5) Reduce environmental impact by decreasing incentives for social trails

Thank you for supporting the important and much-needed project!
Date submitted (UTC-11): 4/15/2021 3:40:04 AM
First name: Bethany
Last name: Holman
Organization:
Title:
Comments:
I am writing in support of the proposed Lemon Gulch trail network. I am very excited to see this proposal and cannot wait for it to come to fruition. As an avid mountain biker, hiker, and cross-country skier, I see this trail network and the impact it will have on numerous outdoor opportunities near Prineville as only positive!

I also support this proposal from the perspective of a Prineville business owner and for the positive economic impact this will have on the community. The increased visitors and potentially new residents coming to the area will definitely be beneficial to small businesses here. Not only will the trail system offer opportunities to recreational users, but it will draw visitors to our restaurants, lodging facilities, campgrounds and shops.

I enthusiastically support this proposal!
Sounds like a great opportunity; increased tourism and some rippin' downhill trails!! Looking forward to this!
Date submitted (UTC-11): 4/12/2021 7:29:46 AM
First name: Brennan
Last name: Morrow
Organization:
Title:
Comments:
I am in support of the Mountain Bike trail system proposed for the Lemon Gultch system. We desperately need more trails for MTB in Central Oregon.
More trails in the Ochocos? Heck yeah! We love spending time in that area and riding the awesome mountain bike trails in the area.

Excited to see all the time that is being put in to nail down more access for trail users in Central Oregon. It's a long process and we hope to see more trails in the coming years!
I support the building of this new down-hill mountain biking trail network. I am happy this is occurring as it brings growth, increased diversity of trail styles and modernizes Oregon's mountain bike trail network to foster further growth in the mountain bike community.
April 15, 2021

Slater Turner, District Ranger
Lookout Mountain Ranger District
U.S. Forest Service
3180 NE Third Street
Prineville, OR 97754

Subject: Scoping Comment, Lemon Gulch Trail System Project #58831

The Oregon Mountain Biking Coalition (OMBC) is Oregon’s statewide mountain biking coalition, a group of regional trail organizations representing mountain bikers across the state. We provide stewardship, education and support for the creation, enhancement and protection of mountain biking experiences in the State of Oregon.

OMBC is made up of representatives of 44 Trails, Alpine Trail Crew Association (ATCA), Blue Mountain Singletrack Trails Club, Central Oregon Trail Alliance (COTA), Disciples of Dirt (DOD), Greater Oakridge Area Trail Stewards (GOATS), Hood River Area Trail Stewards (HRATS), Klamath Trails Alliance (KTA), Northwest Trail Alliance (NWTA), Oregon Timber Trail Alliance (OTT), Rogue Valley Mountain Bike Association, Trans-Cascadia, Team Dirt, Wallowa Mountains Bicycle Club (WMBC), and more.

OMBC’s vision is to establish Oregon as a premier mountain biking destination, offering a diverse set of riding experiences in all settings from backcountry to urban, for riders of all types and abilities.

The proposed Lemon Gulch mountain biking trail system project aligns with OMBC’s mission and vision and we strongly support its development. We appreciate the efforts of the U.S. Forest Service Lookout Mountain Ranger District in evaluating and advancing this project.

Respectfully:

Chris Bernhardt
President

Emmy Andrews
Treasurer

Angela Mart
Vice-President

Matt Weintraub
Secretary
With the recent growth to Central Oregon this is what we all need here. This is a great opportunity to get more people and especially kids outside to explore new areas and off the gaming and screening devices. Most of CO trails are over crowded and we need to spread them out. This will also keep local businesses going for years and help all bike shops over the years and employ more local folks for where local restaurant's will see more traffic. Great economic opportunity all around.

The best thing is that CO has so many volunteers to help get this done in a timely manner.

Thank you for considering this project in such a beautiful place to explore.
Hi Beth,

Thank you very much for the opportunity to provide comment on the USDA Forest Service Lemon Gulch Mountain Bike Trail Complex Project.

General Comment:

As the technical reviewer for NHPA Section 106 and other cultural resource issues for the Confederated Tribes of the Warm Springs Reservation of Oregon (CTWSRO), the CTWSRO Tribal Historic Preservation Office (THPO) has concerns with the potential effects to historic properties or cultural resources within the Project Area of Potential Effects (APE). The Project APE is within the areas of concern for the CTWSRO.

Project-specific Comment(s):

This office would like to request additional information about efforts to identify, evaluate, and protect historic properties and cultural resources within the Project APE. We recommend that a reasonable and good faith effort be made to avoid effects to such properties.

Thank you for your efforts to protect cultural resources.

Best Regards, and Stay Safe,

Christian

Christian Nauer, MS
Archaeologist
Confederated Tribes of the Warm Springs Reservation of Oregon
Branch of Natural Resources

christian.nauer@ctwsbnr.org
Office 541.553.2026
Cell 975.235.2026

Standard Disclaimers:

*The Confederated Tribes of the Warm Springs Reservation of Oregon have reserved treaty rights in Ceded Lands, as well as Usual and Accustomed and Aboriginal Areas, as set forth through the Treaty with the Middle Tribes of Oregon, June 25, 1855.

*Please know that review by the Tribal Historic Preservation Office does not constitute Government-to-Government consultation. Please ensure that appropriate Government-to-Government consultation is made with the Confederated Tribes of the Warm Springs Tribal Council.

*The opinions expressed by this author do not necessarily represent those of the Confederated Tribes of the Warm Springs Reservation of Oregon. Information, contents, and attachments in this email are Private and Confidential.

On Mar 12, 2021, at 9:16 AM, USDA Forest Service <forestservice@public.govdelivery.com> wrote:

You are subscribed to Lemon Gulch Mountain Bike Trail Complex for USDA Forest Service. This information has recently been updated, and is now available.
Please see attached scoping notice for a description of the Ochoco National Forest's proposed action and information on how to comment.

- 2021_03_11_LemonGulchTrailsScopingNotice_.pdf

Update your subscriptions, modify your password or email address, or stop subscriptions at any time on your Subscriber Preferences Page. You will need to use your email address to log in. If you have questions or problems with the subscription service, please contact subscriberhelp.govdelivery.com.

This service is provided to you at no charge by US Forest Service.

This email was sent to THPO@fiastrat.org using GovDelivery Communications Cloud on behalf of: USDA Forest Service • 1400 Independence Ave., SW • Washington, DC 20250-0003 • 1-800-832-1355

<2021_03_11_LemonGulchTrailsScopingNotice_.pdf>
Ochoco National Forest Service  
3160 NE 3rd Street  
Prineville, OR 97754

To whom it may concern,

Mountain Biking is one of the fastest growing outdoor sports anywhere. Crook County is regionally tied to Deschutes which happens to be one of the nation's top mountain bike destinations for the last 20 years. The increased popularity of the sport has very visible effects in Bend - both positive and negative - and we are beginning to see this in Crook County. More and more riders are coming to Prineville and the Ochocos and this is only going to increase in the coming years. We also recognize that there is a long history of equestrian trail use in the Ochocos. The Lemon Gulch network has been developed in collaboration and with full support of both Oregon Equestrian Trails and Backcountry Horsemen. By providing this area for mountain biking the conflicts on other trails will be significantly reduced. We believe that by planning and accommodating for this increased use Crook County can reap the economic rewards while still maintaining the qualities of the Ochocos that our residents already know and love.

- Lemon Gulch has huge potential to be a destination riding area.
- Mountain bikers tend to have and spend money when they travel.
- The proximity to Prineville is also a positive feature when it comes to economic activity - less camping more staying in town.
- Increase exposure for all outdoor sports by having a destination trail network.
- Preempt increasing mountain bike impacts on trails within Ochoco National Forest, such as Lookout Mountain by focusing use in a relatively small geographic area that is already a recreation-focused zone (Steins Pillar, Mill Creek Wilderness, Brennan Palisades, etc.) This also helps maintain the overall remote and rugged nature of the rest of the Ochocos.
- Having a mountain bike focused network in the Ochocos will help minimize trail user conflict on existing trails such as Lookout Mountain.
- Allows COTA and the Forest Service to manage and plan accordingly for use rather than chasing growth as has been the experience in Bend.
- Since this has been a collaboration with the Ochoco Trails group - which includes, hunters, hikers, equestrians, the Prineville Chamber and more - a positive outcome will set a fantastic example of how traditionally adversarial user groups can work together successfully.

Seth Crawford  
County Judge

Jerry Brummer  
County Commissioner

Brian Barney  
County Commissioner
I fully support the Lemon Gulch project. Despite the recent renovations of the Cougar, Scotty, and Potlid trails, there remains a dearth of mountain biking specific recreation opportunities in the Ochoco National Forest - in particular opportunities that provide a loop riding experience. The Lemon Gulch project will address this. In addition, it will also ease up on some of the heavy use and user conflicts that the Lookout Mountain trail network currently experiences. The Lemon Gulch proposal was thoughtfully prepared with an eye to creating a trail network with a small footprint in the National Forest while still providing a desired mountain bike recreation experience. Thank you to Ochoco Trails and the Ochoco National Forest for all of the efforts to move this project along.
March 28, 2021

Lemon Gulch Trail System #58831

Ochoco Trails is a community-based coalition dedicated to building and maintaining sustainable non-motorized trail systems in the Ochoco National Forest and Crooked River National Grassland. We aim to develop trail networks that offer a desirable range of experiences while protecting and enhancing wildlife habitat and natural resources. Our membership is diverse and includes hunters, hikers, mountain bikers, equestrians, ranchers, trail volunteers, and environmentalists.

Since 2016 our member representatives have been meeting monthly to plan and develop future trail opportunities in the Ochoco National Forest and Crooked River National Grassland. Lemon Gulch is a mountain bike-specific network and will be the first significant development to come out of our group’s Ochoco National Forest sustainable and comprehensive trails proposal. Ochoco Trails foresees significant user growth in the Ochocos. We believe that by strategically planning and providing for those users we can significantly reduce conflict and minimize environmental impacts, all while improving the experience for both locals and visitors to our forest.

Lemon Gulch is an ideal location for a trail network as it focuses the use in an area of the Ochoco National Forest that is close to town and already recreationally-focused - with Steins Pillar, Brennan Palsades, Wildcat Campground, Giddy-up Coo, and Green Mountain OHV trail all currently existing within this area. The location for Lemon Gulch was also chosen to avoid sensitive wildlife habitat areas.

The Lemon Gulch trail network will:

• Minimize user conflict on existing trails by focusing mountain bike use on Lemon Gulch.
• Minimize environmental impact throughout the broader forest by focusing use on a smaller geographic area.
• Support proactive planning and management for the inevitable increase in recreation in the Ochoco National Forest.
• Prineville and Crook County has not typically been on the radar for mountain bike tourism in Central Oregon. We believe Lemon Gulch was the potential to become a highly desirable bike destination and have a significant positive economic impact to Prineville and Crook County.
• Serve as an example of successful multi-user collaboration and of the efforts of Ochoco Trails

Ochoco Trails looks forward to continuing work on Lemon Gulch and other collaborations with the Ochoco National Forest.

Sincerely,

Darlene Henderson
Chair, Ochoco Trails

trailsochocotrails.org
I am excited about the proposed Lemon Gulch non-motorized trail system! The Ochocos are a wonderful area to ride and the proposed trails would help provide alternatives to Lookout Round Mtn and other Central Oregon trails. The terrain in Lemon Gulch looks to be excellent for mountain biking.
This is a great opportunity for non motorized recreation. With the Corona virus closing other recreational activities its gotten a lot of people off the couch and back on bikes experiencing what the outdoors has to offer again. These trails would be a great addition to central oregon and especially the prineville/crook County area. It will bring more revenue to the area as well as another way to see the forest. Central Oregon reputation for outdoor recreation is growing and these trails will add what it had been missing without having to go to bachelor.
I would like to see this trail project move forward. Developed trails in this location would provide another beautiful recreational opportunity east of Prineville. Keep in mind that along with increased traffic on area roads, there will be more dispersed camping nearby. Also, I would encourage you to work with adjacent private landowners to address their concerns. I would particularly address the private parcel along the 100/130 road. It appears that one trail segment would begin/end very near that parcel. You might consider deleting the trailhead there and instead concentrate on short loops near the main trailhead for beginners or those with time constraints. Thanks to COTA and USFS for partnership in this project. David
I am all for a project like this!!! Downhill specific trails with different degrees of difficulty and a shuttle able road is the type of riding this area is missing. I feel many locals would enjoy this area and it would be a draw for out town riders. Who in turn will spend money in Prineville. Bend is filled with flat smooth trails, variety of this type of terrain is dream come true!!! Please make this happen!!! Let me know how I can help facilitate this project.

Best Regards,
Delaney O'Connor
I first moved to Central Oregon in 1969 to work for the USFS on the Paulina District. From then until 1979 I worked on various Forests until I settled in Bend working and owning a bicycle store.

I fell in love with the Ochoco National Forest that first year and through out the years I frequently visit the Forest, hiking, riding, stargazing and more. Besides the geology, flora and general scenery the remoteness has always been a draw.

As recreation continues to grow and people move to our area having a new, more technical riding area will be a bid addition to Central Oregon, especially for Prineville. Mountain Biking a a fairly low impact activity that will make access to the Ochoco Forest easier so others can enjoy what I have enjoyed for the last 50 years.
Crook County On The Move, a program of Crook County Foundation, that encourages healthy lifestyles for people of all physical abilities, supports the proposed Lemon Gulch area trail system. In addition to meeting the community's increased desire for an easily accessible network of mountain biking trails, we support the plan's incorporation of the variety of use from the beginner biker, to adaptive mountain bike trails for people with disabilities or limited mobility, to options for hikers.

It is important to draw, and more evenly distribute, current and future mountain bike/hiking use from the areas of Lookout and Round Mountain. As recreational traffic increases in these areas, minimizing use will protect the surrounding habitat while improving the experience and safety for other users in these areas.
I fully support the addition of a sizable trail network like this. Additional trails will reduce congestion on existing trail systems and encourage individuals to get outdoors safely.
First name: Earl
Last name: Alderson
Organization: 
Title: 
Comments: This looks like it would be a great project for central Oregon! Bikes are good for everybody. They make people healthy and Mt bikers spend money that helps the economy. Please support this project! Thanks Earl
March 28, 2021

Central Oregon Trail Alliance is a trail advocacy group representing mountain bikers throughout Central Oregon. We have chapters in Bend, Sunriver, Sisters, Redmond, Madras and Prineville and have a decades-long history collaborating with the Forest Service in both the Deschutes and Ochoco National Forests.

Mountain biking has grown enormously over the last 10 years and it is no secret that Bend has seen huge impacts, both positive and negative, from that growth. With no sign of slowing, it is clear that our local and visiting mountain bike community will continue to expand beyond the traditional trail networks on the Deschutes National Forest and into outlying communities like Prineville, Madras, and Sunriver. The Ochoco National Forest, and Lemon Gulch in particular provides one of the best opportunities for easing the strain on our existing trails, while also having exciting potential for new recreational opportunities.

Here are some of the many benefits COTA envisions with the development of Lemon Gulch:

- Ease the current strain on existing trail networks in Bend and surrounding areas.
- Preempt increasing mountain bike impacts on trails within Ochoco National Forest, such as Lookout Mountain.
- Having a mountain bike focused network in the Ochocos will help minimize trail user conflict on existing trails.
- Allows COTA and the Forest Service to manage and plan accordingly for use rather than chasing it as has been the experience in Bend.
- Lemon Gulch is designed as a modern, gravity-focused trail network. This is a user experience that has long been requested but under provided in Central Oregon (due to many factors such as available terrain and soil types in Bend). By creating this experience we expect to minimize current and future illegal trail building efforts in our region.
- Lemon Gulch is much closer to Prineville than other trails in the Ochocos. This means greater positive economic impact for the community, as well as helping to focus use on this relatively small geographic area.
- Our expectation is that the vast majority of mountain bikers visiting the Ochocos in the future will choose to ride primarily at Lemon Gulch. This will help maintain the more remote, backcountry type experience that riders, hikers, and equestrians often seek on trails like Lookout, Cougar Creek, and Potlid trails.
- Since this has been a collaboration with the Ochoco Trails group, a positive outcome will set a fantastic example of how traditionally adversarial user groups can work together successfully.

COTA strongly supports the development of the Lemon Gulch trail network and we are excited to continue working with the Forest Service to make it a reality.

Signed:

Emmy Andrews  
COTA Executive Director  

Aaron Lazelle  
COTA Crook County Chapter Representative  

Travis Holman  
COTA Board Member  
Lemon Gulch Project Lead
Date submitted (UTC-11): 3/22/2021 3:54:59 PM
First name: Erika
Last name: Schmid
Organization:
Title:
Comments:
I am writing my support for the Lemon Gulch trails. The proposed trails would bring more opportunities for healthy recreation to the Prineville and Central Oregon region. The Lemon Gulch trails would offer a shuttle Downhill Mountain bike area which is actually somewhat unique to Central Oregon though there is a large demand. I also understand that this trail system may include access for disabled bikers with off-road wheelchairs. Lemon Gulch trails provide the means for all kinds of people to get outside and enjoy some off-road wheeled fun!
Hello, Thank you for preparing this detailed scoping notice for expanded offroad cycling recreation opportunities in the Ochoco National Forest. There is a large disparity in the amount of trail miles open to cyclists and the number of cyclists that like to cycle offroad. There is an even larger disparity for advanced level trail riders and the Lemon Gulch proposal goes a long way to address this problem. As the founder of the Oregon Timber Trail Alliance and founding member of the Oregon Mountain Biking Coalition I applaud this effort to evolve our public trail systems to meet the demands of its users in an ecologically sensitive manner. Thank you for your diligence and collaboration with Central Oregon Trail Alliance to develop this plan and I look forward to visiting Prineville and proudly riding these trails someday soon.
Date submitted (UTC-11): 3/14/2021 4:09:37 PM
First name: Grant
Last name: Waring
Organization:
Title:
Comments:
This project and trail system is much needed to serve the communities of Central Oregon. I fully support the development of this trail network!
Thank you for your consideration of this project in our region. I am in support and trust our trail stewards and partners to do it well.
I support this trail system 100%. The population increase in Central Oregon demands that we expand opportunities such as this on our public lands. Please do not forget the Ebike crowd when designating approved users of these trails.
Comments:
Looking at the proposed trail system. I am excited to know there is a possibility of this vision actually happening. Not only will this system ease the stress off surrounding trail areas it should also offer a boost to the Prineville community's economy. With all the years I have volunteered with COTA rest assured that once this trail system is put in place it will continue to be maintained through COTA and hundreds of volunteer hours. While it may seem there are already enough trails out there this system would offer a whole new type of trail that is nearly non-existent in the region. This system would help round out the access to the outdoors in every county in Central Oregon not just Deschutes and Bend. Over the last five years BEND trails have evolved into a network of Central Oregon trails and this addition just makes sense.
Thank you for the opportunity to comment on the proposed Lemon Gulch trail network. As a soon-to-be 70-year-old who is relatively new to Prineville, some of my reasons for supporting this proposal may be slightly different than those representatives of the mountain bike community.

When we chose to move to Prineville, one of the most compelling draws was the evidence in the area of projects that enhance and protect our natural resources while providing excellent outdoor recreation opportunities for persons of all ages and abilities. Examples include the Prineville Bike Park, the Crooked River Wetlands Complex, the Barnes Butte Natural Area and the designation of a local highway along the Crooked River National Scenic Waterway as a Scenic Bikeway. All of these offer opportunities to walk, hike, bike or simply sit and watch nature. The Lemon Gulch trail network would be another addition to these jewels, serving to provide more recreational opportunities while protecting the larger Ochoco Forest area from overuse. As a bonus, it will help alleviate overuse in neighboring areas, such as Bend and Sisters.

I am supportive of this proposal because it provides a variety of trails to be used by various users with very different abilities. It will help to minimize conflicts between users by providing options to mountain bikers, hikers, equestrians and people like me, the "strollers" who still enjoy wandering down a trail. As it is envisioned, this network will also avoid impacts to critical wildlife habitat.

I am particularly pleased to see that this proposal includes two trails designed for people with disabilities on adaptive mountain bikes! What a great opportunity for them!

The Lemon Gulch trail network proposal represents the best of recreational and environmental planning. It has been designed by a diverse group of people with varying interests that are all addressed in the proposal. It seeks to minimize impacts to the ecosystem. It is supported by business, environmental communities, and users of all types. Support for the proposal is demonstrated by letters you have received, but future support will be well demonstrated by volunteer labor and potential financial assistance from these same groups on an ongoing basis to address the trail construction and maintenance.

I wholeheartedly support this proposal and urge USFS to approve it so construction may begin. The volunteers are ready!

Thank you again for the opportunity to comment.
Central Oregon NEEDS trails like the ones which are proposed in this region. We overall lack trails with big views, steep grades and technical features.

Due to the lack of trails like this - often people are going out and building trails which have these features and this creates a big problem for all.

Please allow these trails to come to fruition! It will help spread the user base around more and provide riding which is rare in this area. It will also help Prineville economically.

I have been an active trail builder for the last decade in Central Oregon, and I would love to help out.
Super excited about this project. It will be another venue to take our middle and high school student/athletes to explore and volunteer for trail work. Thanks!
Thank you for building this type of trail I've been living in Central Oregon all my life and we've always needed this type of trail system for mountain bikes I've been using Phil's trail and the others for so long and I would be so excited to see something like this go up in the oshicos it would be so good for the economic development of the region and a special place for mountain bikers and region thank you again for moving this project along
I live in Central Oregon, volunteer time with COTA, and support this project. We ride in the Ochocos once or twice a summer and always stop in Prineville for food, drinks, and last minute grocery. If this trail system goes through we would visit 4-6 times a summer. This is a fantastic plan with riding styles not available to this extent anywhere else in the area.
I love riding in central Oregon but the trail systems are seriously lacking steep and technical trails.
I believe this trail system would do nothing but good for the Ochoco NF and surrounding communities. The Lemon Gulch trail system would bring attention to one of the lesser know forests in Oregon in a positive way. The projected system also appears to be relatively consolidated which is a great way to bring in more users to the forest without pushing out other user groups. Mountain biking generally appeals to a population of people that will leave their dollars with local establishments such as bike shops, brewery's, and grocery stores. I currently ride 1-2 times a year in the Ochocos (Round Mountain and Lookout trails) but I know if these trails were put in place I would likely be out 5-6 times a year. Given Central Oregon's current population influx a new system such as Lemon Gulch would also ease use on the current state of the over saturated trails in Central Oregon. Lastly, I know that I have a bias as I am an avid mountain biker. However, in the last 20 years a majority of my vacations have been spent in communities with great trail systems (Moab, UT, Fruita, CO, Oakridge, OR, Cedar City, UT) and I have seen first hand how the proximity of these trails have helped pump money into the local economies and improve these areas over the years. I hope the Ochoco National Forest management considers all of these factors concerning the implementation of this trail system. The pros will highly outweigh the cons!
I support this proposal.
Blue Mountains Biodiversity Project Scoping Comments on the Lemon Sulph Complex Mountain Bike Trails Project

To: Sklar Turner, District Ranger
Lookout Mountain Ranger District
Ochoco National Forest
3160 NE Third Street
Prineville, OR 97754

From: Karen Coulter, Director,
Blue Mountains Biodiversity Project
Fossil, OR 97830

April 3rd, 2021

How does the planned logging of the Mill Creek timber sale (aka the so-called Mill Creek "Dry Forest Restoration Project") interface with the proposed Lemon Sulph Ute bike trail system overlapping the same area? Commercial logging severely degrades the recreational experience. An example of the grimness of the setting post-logging for recreational hogs is the bleak, sterile, barren landscape of the West Bend sale near the Deschutes River on the Deschutes National Forest. I went to camp there overnights and was greatly depressed by the highly unnatural effects of the new common logging in very low basal areas. It was horrifying, I had field surveyed the proposed sale prior to logging so I could directly compare pre-and post-logging conditions. After logging, the area did not appear to be a natural forest and seemed devoid of plant diversity and wildlife. Other people camping in the area, including mountain bikers, looked as shocked and grim as I was. I bet many of them never came back to recreate there. I know I have no desire to spend time in such logging devastation again. How would impacts to the mountain biking experience be prevented with
the implementation (logging, road-opening, ground disturbance, invasive plant introduction, loss of natural forest character, loss of plant diversity and wildlife habitat, glazing loss of trees, etc.) of the Mill Creek timber sale now being planned concurrently with the Lemon Gulch mountain bike trail system? Consideration of cumulative effects of both the trail system and the timber sale is essential, and both projects need to be planned to prevent such cumulative impacts. Cumulative effects would include negative impacts to wildlife, especially species sensitive to human disturbance and lack of hiding cover, greater forest density, and multi-layered canopy or shrub layers, such as Mule Deer, Rocky Mountain Elk, Northern goshawk, Northern Pygmy owl, and many Neotropical migratory songbirds. Too much clearing creating large openings would degrade or destroy suitable marten habitat. Loss of sufficient overstory canopy closure would eliminate suitable Pileated woodpecker and Northern goshawk nesting habitat. Other cumulative effects include ground disturbance, loss of plant cover, erosion, sedimentation of streams (e.g. Lemon Creek), related negative effects to fish species and other aquatic species such as Columbia Spotted frog and Dragonflies, and loss of tall grasses and shrubs important for nesting of songbirds. There could also be cumulative resulting increased introduction and dispersal of invasive exotic plants, which could lead to increased competition with native plants and increased toxicity in soils and water from more herbicide use, as well as toxic contamination of edible and medicinal plants.

The mountain bike system looks very intensive (high density of trails) on the map, and would likely effectively keep elk out of the whole area, as well as
BMBP scoping comments on the Lemon Gulch Mt. bike trail project

As causing significant disturbance-related energy expenditure for already declining Mule deer. Elk have been documented to avoid Mountain bikes more than hikers. Loss of fat stored for winter survival due to human disturbance is especially harmful to Mule deer. How much elk and deer habitat is there now in the trail system area? How would elk and deer populations be protected in the area? How much elk and deer habitat overlaps the proposed trail system in summer range in part, as well as winter range? How would water source security be affected for wildlife use by the mt. bike trail system disturbance?

Mountain bike use on hiking trails often completely dominates the trails to the exclusion of hikers through negative hiker experiences of constantly having to stop off the trail to avoid being hit by fast-moving mountain bikes. I tried hiking on a mountain bike/hiking trail near Sandy, Oregon, and never hiked there again due to conflict with many mountain bikers, most of whom did not slow down or give way to hikers.

How would hiking be protected and encouraged as use of these trails? My suggestion is to leave separate hiking trails marked as such instead of the entire system being designated for mountain bike use. This would also reduce disturbance impacts to wildlife.

Consider dropping commercial logging in the mountain bike trails vicinity area and leaving hiking common either side of the trails. We ask that you reduce the proposed trail density and stay out of elk calving and deer fawning areas and other areas of high elk and/or Mule deer use with the mountain bike trails. The mountain bike trails should also not be located in or adjacent to Northern goshawk nesting areas.
(within the 30 acre buffers) or within Goshawk Post-
Fledging areas, as Northern goshawks are known to
abandon nests after human disturbance.

How would sedimentation at Lemon Creek be avoided
or prevented from mountain bike trail use adjacent
to the creek? Mountain bike use adjacent to Lemon
Creek or within its RHCA could also be disruptive to
Neotropical migratory songbirds such as riparian-associated
warblers, like the yellow warbler and MacGillivray's warbler.
Nesting and fledging in riparian zones could be interrupted.
The trails should not be routed through any currently
existing exotic invasive plant infestations. Invasive
plant prevention measures, including boot brush stations
and invasive plant identification signs should be required
for each trailhead and/or parking area.

We request consideration of an alternative to the proposed
action in which the mountain bike trail system avoids
all high-use or special seasonal use cell and deer areas,
and all goshawk nest area buffers and Post-Fledging areas.
Parts of the planned trail system that have high wildlife
use or go into areas farther from existing road prisms
that are open roads should either be dropped or be
designated and designed for hikers only. All trails
should avoid any sensitive plant populations.
The trail system should not enter the Lemon Creek
RHCA or other RHCA's, such as for fens, seeps, or springs.
The proposed trail design should be significantly scaled
down, or have some of the trails for hikers only.

Please send me a larger scale, more detailed map of
the proposed mountain bike/hiking trails with section
lines and numbers, topographic lines, and road numbers
and mapping of secondary and closed roads as well as
major roads, including also streams. Thank you for
consideration of our comments. For the Wild
[Signature]
I support the development of the Lemon Gulch mountain bike trail network project. It provides more challenging biking options, offers more outdoor experiences for locals and visitors alike, and would be well maintained by the long-standing local trail alliance, Central Oregon Trail Alliance. Thank you.
Melinda Kestler

Dear Ms. Kestler:

This letter is in response to your eligible objection to the draft Decision Notice (DN) and Finding of No Significant Impact (FONSI) for the Ochoco Wild Horse Herd Management Plan and Forest Plan Amendment, Lookout Mountain and Paulina Ranger Districts, Ochoco National Forest. I have read your objection and reviewed the project record, the draft DN/FONSI, and the final revised Environmental Assessment (EA). My review of your objection was conducted in accordance with the regulation at 36 CFR 218 (2013).

PROJECT DESCRIPTION

On November 17, 2020, the legal notice was published in The Bulletin (Bend, OR) announcing the Predecisional Administrative Review (Objection) Period for the draft DN/FONSI and final EA for the Ochoco Wild Horse Herd Management Plan and Forest Plan Amendment. In the draft DN/FONSI, the Responsible Official documented the selection of Alternative 2, which includes the following actions:

- Establish an appropriate management level based on current conditions; an appropriate management level (AML) for the Ochoco wild horse herd in the draft decision was established at 12 to 57 wild horses.
- Authorize population growth control, gather and removal of excess wild horses, and fertility control measures; the primary tools for controlling the Ochoco wild horse population and maintaining the herd size will be using gathers and contraception.
- Authorize actions to improve and maintain genetic variability.
- Establish guidelines and adopt best management practices.
- Authorize an Off-Range Plan.
- Incorporate resource protection measures including gather operations/locating traps, invasive plant prevention measures, and botany project design criteria for sensitive plants.

OBJECTION ISSUE DISCUSSION AND CONCLUSION

Objection issues were raised regarding the following topics: appropriate management level; population control; sale/adoptions of horses; grazing; NEPA/NFMA violations; and violations of other laws.

The objection resolution meeting was held on February 24, 2021. After the resolution meeting, the Forest Supervisor held follow-up meetings with members of his staff to discuss issues related
to the proposed selection of Alternative 2, focusing their discussion on the AML, gatherings and population control. As a result of their interdisciplinary discussions, the Forest Supervisor has agreed to voluntarily make the following changes in the final decision:

AML: The original low end of the appropriate management level (AML) of 12 horses calculated in Appendix B of the EA was based on what the allowable forage would be considering big game use of the area during a winter of above-average snowfall. Because big game are able to move off the Territory during winters of above-average snowfall and are known to typically do so (ODFW, 2019), the final decision will not incorporate big game use of the winter range in the AML. As such, the initial AML for the Ochoco wild horse herd will be modified to 47 to 57 horses. Management of the herd will be focused on maintaining wild horse numbers within the high end of the AML, as documented in the EA.

Gelding: Gelding was determined to not be a high priority tool and unlikely to be used; therefore, it is not authorized with this decision. The Forest would conduct additional analysis before moving forward with any use of gelding.

Future Gathers: Once gathers have reduced the herd to within AML (the EA at 21 and 57 estimated this would take up to 5 years), the Forest will assess whether there are any changed conditions or new circumstances that would warrant additional analysis. A supplemental information report will be prepared before further gathers are undertaken in order to assess any changes in circumstance, or in the condition of the Territory.

Helicopter and Fixed Wing Aircraft Use in Gathers: The Forest stated this would not be a high priority tool and is unlikely to be used; therefore, it is not authorized with this decision. The Forest would conduct additional analysis before using this tool in gathers.

Improving Riparian Condition in the Territory: The Forest Supervisor felt it was important to note that the Forest Plan amendment allows for the AML to be adjusted based on conditions in the Territory, rather than imposing a permanent cap on the number of wild horses that may be in the Territory. The Forest’s goal is to have a satisfactory condition rating for riparian areas. Riparian condition is a key factor in determining the allowable forage utilization level for animals on the winter range of the Big Summit Territory, and therefore it is also a key factor in the AML analysis. The EA points out that because the riparian areas are in unsatisfactory condition, the Forest Plan provides that the allowable cumulative annual utilization by big game, wild horses, and permitted livestock is a maximum of 30%, leaving 70% of herbaceous production for the maintenance and improvement of watershed health. EA at 45, 210. Were the riparian areas to be in a satisfactory condition, the allowable cumulative annual utilization is a maximum of 40%. LRMP at 4-141. The Responsible Official is confident that the riparian conditions can be improved over time with implementation of appropriate management actions. The scope of this decision is limited to wild horse management; however, he is committed to working collaboratively to create a vegetation and riparian restoration management plan with a goal of satisfactory riparian condition and an allowable cumulative annual utilization maximum of 40%.
In addition to the modifications that the Forest Supervisor has voluntarily agreed to make, I have asked the Forest to make some additional clarifications related to the analysis. These include the following:

- Additional clarification in the final DN/FONSI would be helpful in documenting the conclusion that predation specifically from wolves has not been a substantial factor in impacting the population of horses on the Territory;
- To further clarify treatment of animals, I instruct the Responsible Official to cite 36 CFR 222.69(a) and 36 CFR 222.69(b)(1) and (b)(5) in the final decision as the authority for removal of wild horses, as documented in the EA at 17;
- Clarification could be added to the final decision regarding the requirements and guidelines in the Allotment Management Plan for placing salt and proteins;
- Both the Ochoco Summit OHV Trail Project and Blue Mountain Forest Resiliency Project have been cancelled and should be removed from the EA in an errata.

In summary, I conducted my review of the record, final EA, and draft DN/FONSI and found that other than the voluntary modifications and clarifications noted above, no other remedies or resolutions are needed. Based on my review, I conclude the following:

- The draft decision clearly describes the actions to be taken in sufficient detail that the reader can easily understand what will occur as a result of the draft decision.
- The draft decision considered a range of alternatives that was adequate to respond to the Purpose and Need. The purpose and need and alternatives considered in the final EA reflect a reasonable range of alternatives, consistent with law, regulation and policy.
- The draft decision is consistent with or moves toward attainment of Forest Plan standards and guidelines, and proposes an amendment that is limited in context and intensity and that is compliant with the 2012 Planning Rule.
- The draft decision is consistent with policy, regulation, law, direction, and the final EA contains adequate evidence to support the decision. The record and final decision contain site-specific documentation regarding resource conditions, and the Responsible Official’s draft decision document is based on the record and reflects a reasonable conclusion.

This concludes my written review of the project. By copy of this letter and the enclosed response document, the Responsible Official may sign the decision after including the voluntary modifications and additional clarifications noted above, then notify interested and affected persons in accordance with the regulation at 36 CFR 218.12 and 36 CFR 220.7(d). This written response is the final administrative review by the Forest Service or the Department of Agriculture [36 CFR 218.11(b)(2)].

Sincerely,

DEBORAH HOLLEN
Digitally signed by
DEBORAH HOLLEN
Date: 2021.03.22
17:44:56 -07'00'

DEBBIE A. HOLLEN
Deputy Regional Forester, Pacific Northwest Region
Objection Reviewing Officer
Enclosure

cc: Shane Jefferies, Beth Peer, Robert Garcia, Slater Turner, Steven Gibson, Rebecca Harrison, Debra Anderson, Elizabeth Rumpza
June 23, 2021
Lookout Mountain Ranger District
Ochoco National Forest
3160 NE 3rd Street
Prineville, OR 97754

Don and Kim Vogel
(503) 316-0052
Prineville, OR 97754

RE: Lemon Gulch Proposed Bike Trail System
Initial Scoping Comments

District Ranger Slater Turner,
Please accept our comments, as solicited by your office, through our recent grazing allotment permit meeting with Tory and Mikayla, as well as through our meeting on May 27th. Thank you for the opportunity to be involved. Projects affecting the vested interest we have in our permitted grazing allotment and the Mill Creek Valley are of great importance to us.

We have numerous concerns about the proposed trail system, the lack of purposeful involvement of existing permittees in the area of the proposed project, as well as the lack of purposeful involvement of adjacent landowners, and affected landowners in the Mill Creek and McKay valleys. We hope that this gesture for involvement is sincere and that our comments will be met and received with the same weight, time for consideration, and open arms as the proposal, and previous work to this point.

At the meeting, any requests to consider other areas in the analysis were dismissed. Our hope is that your initial response to such a request was an understandably, surprised reaction after an already long process. Unfortunately, that process did not include existing permittees, adjacent landowners, and affected landowners. You were not afforded the benefit of their voice, their concerns, and their ideas in a thoughtful process. Again, we hope that you offer those most intimately affected, the same ear and length of thoughtful communication and debate that has been afforded the proponents of this proposal.

The list of concerns is long; however, there are three overriding concerns that bear emphasizing repeatedly, are a common thread in other issues, and represent the largest hurdle to even considering this proposal. In our view, these pose feasibility threats to the proposal itself. For if the proposal is not even feasible, and the proposal is not modified to even address them, why consider the proposed action at all?

1. We do not feel the proposal is consistent with the Ochoco National Forest Plan, the desired future condition of the Forest, the “dispersed recreation niche” of the Forest, as you described it, or the existing Socio-Economic culture of Crook and Harney counties. How would the proponents and the Forest Service propose to change the proposed action to address this deviation from the existing management emphasis?

2. There is a lack of funding to develop, maintain, or manage such a highly developed recreation facility. There is good precedent set across the nation for handling such proposals and the expense that comes with them. A fee structure would have to be a part of the proposal for it to
work well and meet management objectives and forest plan standards. The proponents say that this kind of recreation is coming and we must prepare and manage it. Agreed. Yes, the proponents will be good about building the trail system, but grants and private funding only fund the building of infrastructure, they never fund maintenance or management. While volunteers are great at maintaining trails, they won’t have authority to manage user conflicts, breached standards/regulations, etc. If they did, it would be happening on Lookout Mountain. Crook County will have numerous impacts associated with this proposal (county road improvement needs, enforcement, fire response). How will those be resolved? There must be a fee structure associated with this proposal, with a clear description of how it will be structured for this proposal to be feasible for consideration. Otherwise, there will be no funding for management, maintenance, patrol, enforcement, etc. Developed recreation across the country is contemporarily funded properly this way.

3. How do you mitigate the inherent conflict created between bikers and cows when the intent in the creation of a trail system is for thrill and speed? Nothing in the proposal recognizes the fact that this piece of ground has been in grazing allotment since the beginning of the establishment of its boundaries. This oversight is huge and can only be alleviated if the proposal is revised to acknowledge, address, and embrace the existing management situation.

Once the proposal has been revised for feasibility, the following issues (not a complete list, but only initial and not fully fleshed out at this point) remain:

- **Road Safety** – the present county road is not engineered or built to transport the increased number of recreationists to include shuttle vans and bicycles in addition to existing recreation, farming/ranching activities, and traditional neighborhood traffic. A transportation plan should be associated and analyzed as a part of this proposal or in the least as a contingency for approval of any developed recreation on the Forest.

- **Density of trails** - The density of the proposed trail system does not allow for livestock or wildlife escape. No matter how many trails become developed (for example, even if the 53 miles gets reduced to 23) they will only grow, especially with developed trailheads.

- **User created trails** - User created trails are always of issue in developed mountain biking systems. These are trails created by users to create jumps or adjoin other trails or to open up more country for trail making. Mountain bikers do not discriminate between public lands and private lands. They take land for their own use. How will user created trails and those who create them be patrolled, policed and managed? What kind of forest orders will be put in place to address the new management situation? How many additional law enforcement staff will be needed?

- **Increased Fire Hazard** – How will the Forest and the County manage the increased fire danger created by highly developed recreation and increased numbers of recreationists? With climate change active and upon us, shoulder seasons are much more volatile with extreme temperature changes and weather patterns. With these changes wildlife behavior has been changing as well. How would any trail system be managed and patrolled to mitigate effects to adjacent landowners and affected landowners up and down the valley.

- **“Sacrifice Area” for wildlife** - This area was deemed a sacrifice area for wildlife by the State. What is the criteria for a sacrifice area? Why do we sacrifice the wildlife in this area and not others? There is already limited opportunity for hunting (a paid recreation activity) in the area. How do we justify sacrificing this area when there is numerous opportunity elsewhere? Why
not a broader segregated system on Lookout mountain to alleviate issues there and provide for
the sought after biking experience? How will you manage this developed recreation to provide
for hunting and grazing as well?

- **Forest Staffing** – a predominantly dispersed recreation forest is not staffed, funded, trained, or
equipped to handle increased highly developed recreation. A **development plan** to include a
**timetable and funding source** for all of these elements should be included in the proposal. A
proper analysis cannot exclude the anticipation of growth, both within the existing proposed
action boundaries and beyond.

- **Mill Creek Wilderness** – the close proximity of the **Mill Creek Wilderness** should be noted and
anticipated impacts, possible **encroachment** of user created trails, and increased use from
recreationists considered.

- **Impacts to Adjacent Landowners** – **Adjacent and neighboring landowners** are accustomed
to having National Forest as a neighbor and adjust to fluctuating use in various seasons.
Conversely, National Forest officials understand that **to be good neighbors** their management of
forest users is imperative. How will the Forest handle lost bikers, trespass on private lands, cut
fences, open gates, city people who expect their cell phones to work in a remote area and have
no coverage or plan when their “norm” is not reality? These impacts cannot be treated lightly
or dismissed.

- **Adaptive Management** – how will the Forest **monitor use**, resource impacts, grazing
permittee impacts, and adjacent landowner impacts and implement **adaptive management** as
conditions change? How will the **cumulative impacts** of the development of these facilities and
the associated increased use be monitored and changes be implemented?

- **Lookout Mountain** – **Why has a modification of the existing trail system at Lookout
Mountain** not been included in this analysis? It makes sense to alleviate the existing issues and
know how it works before venturing out to propose, build, and manage another. Please allow
for a look at a wide variety of trail system locations. There were **2 other options preliminarily
reviewed** and disposed of without proper consideration of the issues identified recently. A step
back is appropriate at this point if a **well-planned, culturally accepted plan** is to be allowed to
move forward.

We look forward to working with district and forest personnel on the revised proposal and developing a
trail system somewhere on the forest or BLM that meets the needs of existing forest users/permittees,
the existing cultural and socio-economic niche of the Forest, as well as increasing demands for managed
recreation.

Thank you so much for the opportunity to be heard and most importantly included, considered and
listened to in this process.

Sincerely and Respectfully submitted,

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Don and Kim Vogel
Mill Creek Residents
Forest Permittees
Adjacent Landowners
Thank you for the opportunity to comment.
As affected landowners and potentially impacted grazing permittees we are just learning of this project. We first learned of the project at our annual operating plan meeting last week and only recently received a mailed copy of the proposal via mail.

We have numerous questions about this proposal and would like the opportunity to have those questions answered and do some field review before being able to comment as to the feasibility of the project, initial safety concerns relative to the county road condition, impacts to our permitted grazing allotment, long-term maintenance of trails, potential for renegade trails (from experience with other such projects), impacts to adjacent landowners, impacts to winter range in a winter range management area, and possible alternatives in a more conducive forest management area with emphasis on managing for recreation.

Please accept this comment as my initial request for an extension of time and the opportunity to be a part of the process in the review of this project and the development of alternatives.
Thank you,
Kim Vogel
First name: Kim
Last name: McCarrel
Organization: Oregon Equestrian Trails
Title: Ochoco Trails Representative
Comments:
I am submitting comments supporting the Lemon Gulch trails proposal on behalf of the Central Oregon chapter of Oregon Equestrian Trails (OET). OET is a 501(c)3 nonprofit organization dedicated to building and maintaining trails and horse camps in Oregon and preserving recreational equestrian access to public land.

Oregon Equestrian Trails is a member of Ochoco Trails, a coalition representing trail users, environmentalists, ranchers, and wildlife advocates that work to support sustainable trail networks in the Ochoco National Forest and Crooked River National Grassland. Ochoco Trails members recognize that the Ochocos don’t currently have enough mountain biking trails to meet the rising demand. In our view, Lemon Gulch will help to address this need.

The Lemon Gulch Trails project embodies the type of trails we all want, and Oregon Equestrian Trails is wholeheartedly in favor of it. Construction of these purpose-built mountain bike trails will benefit equestrians by attracting some of the bike traffic currently on the Lookout and Round Mountain Trails. This will make the multi-use trails safer and more enjoyable for horseback riders and hikers.

The new trails will attract visitors to Prineville and Crook County, benefiting the local economy. The trails’ proximity to Prineville will encourage locals to engage in healthy outdoor recreation. And the proposed trail network is relatively dense, concentrating use in an area that does not contain sensitive wildlife habitat.

Oregon Equestrian Trails enthusiastically supports creating the Lemon Gulch trails project and applauds the Ochoco National Forest for your consideration of this trail proposal.
I am so excited to hear about the expansion of biking trails in the Ochoco’s! The forest is one of my favorite places to visit in Central Oregon. Whenever I visit, all I can see is the great, massive potential for awesome mountain biking and hiking trails! The terrain in the Ochocos is excellent and would provide some biking opportunities in the winter. I 100% support this project!
Date submitted (UTC-11): 3/13/2021 3:56:55 AM
First name: Maria
Last name: Hatcliffe
Organization: 
Title: 
Comments: 
This is such an exciting project! I love the idea of creating managed, new trails for a variety of users and am especially impressed with the inclusion of trails for riders with disabilities. I also look forward to the creation of more challenging, black diamond trails! I would love to see a system like the Tiger Mtn system east of Seattle which itself has metamorphosed over the past 20 years from some seasonal trails and gravel roads into a well-developed, exciting, challenging high use area, being east of a major urban area. Despite the usage, it works because users spread out over a system of varying challenges. While I don't think the use would be as intensive, my point is just that a well developed area can accommodate the users if planned well. I would also hope there is an even longer range opportunity to perhaps link to additional trail systems in the future. I hope this project can move forward and I feel certain there would be a committed group of volunteers from the region that would help to expedite it. Thank you so much! Exciting to dream about!
Date submitted (UTC-11): 3/18/2021 12:11:41 PM
First name: Mark
Last name: DeJohn
Organization:
Title:
Comments:
I have been mountain biking in the Ochocos for the past 25 years. Adding new trails like Lemon Gulch will be such an improvement to the ONF. The location is amazingly good for mountain biking and I really like the idea of spreading the use away from Lookout and Round mountain. I support the concept of more trail access and the financial benefits that will be recognized by the communities in the area like Prineville. This is a real win win situation for all users. Please do it!
The more trails the merrier! I'm excited about the idea of more bike trails in Central Oregon. Thank you for all the effort moving forward with this project.
Date submitted (UTC-11): 3/15/2021 8:20:43 AM
First name: Mark
Last name: Nordberg
Organization:
Title:
Comments:
Really excited to see more hiking and mountain biking trails near Prineville. This will be great for community and help bring in tourism dollars into Crook County.
I support this project and look forward to riding the trails. Thank you!
My name is Mary Beyer. I was the lone permittee on the Ochoco Trail Committee from Fall 2017 - Spring 2020.

I want to first say that I share the enthusiasm of the group for developing the trail system in the Ochoco NF. I understand the need for recreational and tourism development in our community, as a quality of life for all and the economic impact it will bring.

In regards to the Lemon Gulch trail system, my concern has always been (and shared with the group) that of safety and trail management. I shared that this area is a main artery for moving the cattle. The saying, "If you build it, they will come" applies here. The cattle will use the new trails because of ease of moving around, leaving behind ruts and "cow pies", which I am sure will be frustrating to any mt. biker. The same concerns that brought this committee together in the first place, equestrians and mt. bikes safely sharing the trails at Lookout Mountain, will apply here, with the added factor of cattle. Cattle do not react as quickly as horses and I can only imagine what would happen to a biker coming around a corner, only to be met with a cow standing in the trail and if there happens to be at that same time a horse and rider moving that cow! What a catastrophe that could be for all involved.

I feel that the suggestion that my husband and I proposed in our shared letter, of limiting the months of use on the Lemon Gulch trail system is a fair, effective and safe compromise for all users of the trails.

Again, I want to reiterate, that I am excited and 100% supportive of the trail system development in the Ochoco NF. From what I can recall from the proposed maps, the Lemon Gulch system is the only trail system that concerns me as a permittee.

Thank you for your time,
Mary Beyer
This is a fantastic opportunity! Can't wait to see it come together!
I would love to see a focus on one-way trails that are technical and on the harder side (black and double black) in this area to complement the blue and green trails multi-directional trails that are predominant around central Oregon.
So excited about the prospect of more trails, will definitely drive up to ride and contribute to the local economy while I'm there.
Date submitted (UTC-11): 3/15/2021 4:50:05 PM
First name: Matt
Last name: Leonard
Organization: 
Title: 
Comments: 
Lemon Gulch trail system is a fantastic idea that in my view will be a huge plus for the area. Bikers will travel to ride great trails, spend money in Prineville hotels, grocery stores, bike shops, restaurants, etc. There is lack of steep shuttle access trails in central Oregon. Mt. Bikers are very enthusiastic about trail building & maintenance. Yes please approve the Lemon Gulch trail project!
I'm writing to express my support for the proposed Lemon Gulch trail system. This proposed system would provide more downhill and technical trails, which are lacking in the region. In addition, this system would take some of the pressure and ecologic impacts off of the current West Bend system.
I am writing in support of the Lemon Gulch Trail System.

Thank you.
Date submitted (UTC-11): 3/24/2021 8:20:45 AM
First name: Michael
Last name: Wingertsahn
Organization: Oregon Timber Trail Alliance
Title:
Comments:
I fully support the lemon gulch project!
The proposed action of the establishment of the Lemon Gulch trail system would be an outstanding addition for non-motorized recreation in the Ochoco National Forest. From viewing the layout of trails and the sheer number of miles proposed, this would be a diverse trail system that can accommodate multiple user groups and would reduce conflict on other trails in the area as mentioned in the scoping announcement. This would be a unique opportunity to bring technical and steep mountain bike trails to the Ochocos and create a hub of activity that can stimulate tourism to the Prineville area, much like Oakridge. The establishment of these trails constructed in a sustainable and mindful way could also bring about fewer rogue illegal trails being built in the area.

However, there are challenges such as the big game wintering range and wildlife impacts or disturbance. The wintering range closure could be effective in preventing disturbance during months of little to no use or interest in the area by bikers until the snow melts and trails dry out for use.

As trail design allows, there should be clear "one-way" trails for mountain biking and clear signage for trail users warning of traffic. Specific closures on trails that are inappropriate for a given user group (e.g., equestrians on a steep black diamond/double black rated downhill trail) should be well signed, along with yield signage to encourage mindfulness of other users on the trail.

Overall, this is a very exciting project and I am looking forward to hearing more from the planning teams in the future. Thank you.
I wholeheartedly am in support of this project! It would serve a purpose that is very lacking in central Oregon.
Comments:
I am strongly in favor of this trail system providing more trail access to the central Oregon region. Providing access to more downhill specific trails along with a great area for skills of all ranges is definitely something this area of riding can benefit from and will only work to progress the overall riding seen in CO.
I was really excited to hear about this proposed trail system. I've been out to the Ochoco NF in the past and had a great time riding Lookout Mountain Trail. The geography out there is wonderful for mountain bike trail. I really hope this project goes forward as it would be a benefit for the mountain bike community as well as drive more tourism to the Prineville area.
Great to see. I like the amount of trails in a ‘smaller’ area. This will give a lot of options for people to ride a trail within their ability while being in the same area as others who may want to ride more difficult or easier trails. Starting at the same general upper area and all finishing mostly in the same lower area is great.

I like the big loops on the outer limits of the approved area that access multiple options for a downhill trail back to the base of the system. Please allow some double Black or extremely difficult trail options.

I think this is a great place to allow E bikes as it is Mountain Bike specific trail system. This will allow people to do big outer loops easier or pedal up for multiple loops in a day or summer evening. E bikes are not going away and adapting to them now will be good. E bikes will allow groups of people with varying physical abilities to actually access these trails together. A great option for family groups who often cannot all ride together. It is not connected to another trail system directly so possibly easy (relatives term) to allow E bikes in just the Lemon Gulch area within the Ochoco NF.

Very excited for this and it will make the Ochocos and Prineville township a regular on my weekend activities.

Thank You.
I fully support this project and encourage it to move forward. COTA is a wonderful organization with amazing volunteers. Mountain biking is a fantastic way to enhance a community and Bend continues to be a destination location which improves the economy. Diversifying the types of trails available strengthens the trail system and builds a positive community.
This sounds like an amazing opportunity for the town of Prineville. The amount of people attracted to a bike venue of this caliber would have an amazing impact for the town. I will certainly be visiting. Build more!
Date submitted (UTC-11): 4/12/2021 4:40:10 AM
First name: Raya
Last name: Budrevich
Organization:
Title:
Comments:
I support the trail system
As a former resident of Central Oregon and hopeful returnee, the proposed trail system at Lemon Gulch would be outstanding addition to the outstanding recreational opportunities that draw visitors and more importantly, residents to the area. To build from the ground up, using all the knowledge of COTA will ensure sound trails that will require minimal future maintenance. Let's do this!

Thx
This sounds like a great idea. I'd love more trails in central Oregon.
The Lemon Gulch Trail System is a great project!

The addition of an easily accessible trail network will really enhance the recreational and economic opportunities for the city of Prineville.

It will be a popular destination because it's unlike any of the other trail areas in Central Oregon and mountain bikers really enjoy variety of terrain.

With COTA's support these trails will be professionally designed, built, and maintained. As they've demonstrated hundreds of times in the past while building other trails, they take great care of public lands, and are solid partners the USFS can trust and rely on.

BendTrails will promote community support for Lemon Gulch by funneling the users of our social networks to support COTA through memberships, volunteer work days, and donations.

We'll also publish trail maps on our website (as trails are approved and opened) along with descriptions and user-generated condition updates.

Additionally, we partner with the Deschutes County Search and Rescue and share our map data - so SARtopo users will have access to up-to-date trail maps and names - which are critical to quickly locate anyone who needs help in the area.

I'm excited to see the progress of this project!

Robert Rekward
BendTrails
As a member in good standing in Oregon Hunters Association, this proposed plan raises some concerns for me regarding Wildlife and Mule Deer especially. At build-out this trail plan looks to pretty much fill out this drainage. My concern is that this activity level, expected to increase with the development of trails, will effectively drive Deer out of the area to seek more seclusion. Looking at the surrounding area on the maps provided it looks like this area now is an area that could or possibly is used for that purpose by Deer, Elk and other species of Wildlife. With all of the radio collars provided by O.H.A. for recording use and routes of Deer I would like to see that information researched and utilize that with input from the U.S.F.S. Biologist and O.D.F.W. to help with this proposal to help the Mule Deer population. Good plan if this is used for guidance in planning and will not affect Wildlife negatively.
To Whom it may concern,

We are in process of purchasing property at [redacted] in Prineville. We just learned today of this process and would like more time to review the project and any potential impacts it may have on our property, our livelihood, and the safety of our family and animals. We understand that we must provide comment by today to have standing in the product review. We respectfully ask for additional time to review the initial proposal and provide meaningful comments. Thank you for your understanding.

Lemon Gulch Trail System $58831
This would be an amazing addition to this area and I strongly support the project.
Roy and Mary Beyer
c/o Wine Down Ranch
Prineville, Or 97754
April 14, 2021

To Whom It May Concern:

As a permittee on the Mill creek grazing allotment, we are responding to the “Lemon Gulch Trail System Project” proposal. We have some concerns with the building of miles of steep, downhill bike trails in an area authorized to graze cattle during a specific time of the year.

Our main concern is regarding the safety of the downhill riders and our livestock that are typically using that area from mid-May thru late June. If you make trails, the cows will use them. Likewise, when we are moving the cows on horseback, we will also be on the trails because you need to go to where the cows are, moving them to the next pasture on the trails they lead you on. Thus, our recommendation would be to keep these trails closed until July 1st or until most of the cattle are moved out of this area. This is also consistent for the "general forest zones management allocations". The emphasis in these zones is for the production of timber and forage as stated on page two of the proposed project flier. Our livestock and selves should not be at risk from the recreationists while we are permitted to use the Lemon gulch area.

Another concern we have is the large number of bike trail miles proposed and the parking area on the top end of the 3360307 road. Buck spring is near the intersection of the 3360306 and the 3360307 road. It is heavily used by the cattle as there are not a lot of other water sources that high on that ridge. We are concerned that the traffic and bikers starting from that area will displace the livestock to the creek bottoms where they will congregate and make negative impacts to the riparian areas which we try to keep them out of. It would require extra riding to push the cattle back up the hills. This puts more stress on the livestock and requires more man days of riding by the permittees.

We suggest that the upper parking spot should be at the end of the 3360358 and that the trails constructed would start from there and be restricted to the hillside and ridge east of the 3360 road.

As earlier suggested, if this plan is adopted and some bike trails are built, we prefer that they will be restricted for use during the times the cattle are permitted to be in that area and Lemon pasture. We also believe the permittee use and timber management practices in this area, should be prioritized above the recreationists.

Thank you for your consideration.

Roy and Mary Beyer
April 15, 2021

Slater Turner, District Ranger
Lookout Mountain Ranger District
Ochoco National Forest
3160 NE Third Street
Prineville, OR 97754

RE: Scoping – Lemon Gulch Trail System Project

Dear Ranger Turner,

As the agency mandated with management of Oregon’s fish and wildlife (ORS 496.012), the Oregon Department of Fish and Wildlife (ODFW) is responding to your request for scoping comments on the Lemon Gulch Trail System Project (Project). The Project would create approximately 52 miles of new shared biking and hiking routes approximately 15 miles northeast of Prineville.

ODFW appreciates the Ochoco National Forest’s (Forest) efforts to get early guidance on recreational development from stakeholders through the Ochoco Trails Group (OT). ODFW biologists have participated in OT meetings and offered input throughout the Project planning process. As a result, the proposed Project area and trail system design has potential to minimize negative impacts to wildlife by retaining habitat patches (i.e. cores) and seasonal trail closures in the Winter Range Management Area.

As the Project planning process continues, ODFW recommends the following:

- Place bridges in areas where trails cross Lemon Creek. This will reduce the negative impacts of sedimentation on sensitive redband trout.
- Emphasis on monitoring use of the Project in the context of recreation across the Ochoco National Forest. ODFW biologists can advise on methods and equipment (e.g. including trail counters).
- Apply recommendations from guides such as Colorado’s “Planning Trails with Wildlife in Mind: A Handbook for Trail Planners” and the USFS “Sustaining Wildlife With Recreation on Public Lands: A Synthesis of Research Findings, Management Practices, and Research Needs”. Both of these documents have been shared with OT and Forest staff.
- Continue to look for opportunities to close and decommission system and user-created roads and trails to improve habitat cores and movement corridors. Opportunities may exist to tie into the existing ODFW Good Neighbor Authority agreement.

Thank you for the opportunity to comment. Please contact me for further information regarding these recommendations.
Sincerely,

Sara Gregory  
ODFW Wildlife Habitat Biologist  
Deschutes Watershed  
sara.c.gregory@state.or.us  
541-388-6147

cc: Nick Myatt – ODFW East Region Manager  
    Mike Harrington – ODFW Deschutes Watershed Manager  
    Greg Jackle – ODFW Ochoco District Wildlife Biologist  
    Tim Porter – ODFW Ochoco District Fish Biologist
First name: Scott
Last name: Jackson
Organization:
Title:
Comments:
I support the Lemon Gulch trail project
Slater Turner,

We have been permittees and land owners here on the same ground since 1989. We are permittees of the Mill Creek Allotment, running cow/calf animals. My family also owns and operates an agricultural farm and ranch adjacent to the public forest service ground. During this time of aggressive stewardship of the land and vegetation we have worked with Oregon State University to not only maintain, but drastically improve overall conditions of the range and riparian areas.

The primary goals we have as producers is to minimize adverse impact on resources and maximize the weight gain on the calves that are marketed at the end of the season. In order to achieve this we continually ride and monitor the resources and location of livestock. It is imperative that we continue to keep the moves in smaller groups and maintain the disbursement of cattle. With the density of trail proposed it will make it nearly impossible.

The use seen on the public ground directly effects our private holdings. The invasion of trespassing and destruction of the ecosystem is evident throughout. During the years of multi-use have already created a greater need of management resulting in higher costs at our end. The Green Mtn. trail system is a great example of the disruption that occurs with our cattle. There are all types of users that utilize these trails. Some users are very courteous and respectful, over the time I have experienced ATV riders chasing the cattle down the trails and off of the designated trail ways. Along with the stress on the cows and calves they run, many times they head downhill to the creek bottoms, where grazing monitoring is done. These monitoring sights are directly used to determine length of time in each particular pasture and impacts our length of grazing in the allotment. On occasion the pairs are separated and the calf becomes orphaned which reduces the weight gain and ultimately the net profit. This is just one of many examples I have encountered.
Education of the public should be a main concern in this proposal. It would encourage multi-use as a tool for enjoying our public lands responsibility. The riparian restoration that took place on our McKay pasture for the last three years added new challenges and loss of feed and water availability. I understand the idea of trying to relieve the present high use distribution of the Lookout and Round Mountain areas, on the other hand it appears you are trying to overload and destroy the Lemon Gulch area. Our resources are not used by continual herding (as is the case with sheep) we rely on the cattle to be dispersed throughout the entire pasture during our six week to two month time frame of our rotation. If this proposal is accepted as written it could have a negative effect on our effectiveness of utilization of resources, consequently shortening our grazing season.

Our watersheds and allotment already have many miles of established trail systems: in the wilderness (Twin Pillars Trail), across the ridge of three of our pastures (Green Mtn. Trail), on the north end (Potlid Trail), and already in the Lemon gulch area (Giddy Up Go Trail). The maintenance of these trails already challenge the volunteers and financial assistance programs available.

The system proposed appears to have multiple levels of difficulty which I presume means higher speeds. The safety of the bicyclists and the safety of us as riders managing our cattle would be at risk. The trails will obviously be used by wildlife and cattle at will due to ease of access to the different areas. Animals by nature travel a path of the natural terrain and a path of least resistance.

The trail system could adequately meet the needs of the community and get desired opportunity for the disabled and multilevel bikers if it were reduced to a loop trail. This would alleviate the density of miles of invasive trails helping to reduce safety concerns and disruption. It appears many of these trails are hitting the ridges and high points of the terrain which will ultimately drive cattle off of those grazing areas. Pushing the wildlife and livestock to (creeks) riparian areas.

Some alternatives I think that should be considered are using the existing roadways and or abandoned roads used in the past for the trail system. The concentration of proposed trails is ten fold of what could be established to minimize erosion and impact overall. Another suggestion might be to manage the
trail system so not only would it be closed from November 30 to May 1 for the big game use on winter range but also during our grazing period to manage the forage resources and adhere to guidelines.

As this proposal is written I see safety being jeopardized and the distribution of cattle being unmanageable. I would be interested in seeing exactly how this many trails were created in theory or by actual traversing.

Sincerely Submitted,

[Signature]
Shelley Santucci
Mill Creek Allotment Permittee
Yes! I fully support the Lemon Gulch trail proposal. Central Oregon - and Prineville in particular - need this type of mountain bike trail network. The trails proposed are concentrated in a relatively small area leaving much of the ONF untouched. More bike trails means less chance of "loving Lookout Mountain" to death. The economic benefit to Prineville with this type of trail network so close to town is an added benefit.
Thank you for allowing the opportunity to comment on the proposed Lemon Gulch Trail network. I fully support this proposal for many reasons, such as increased recreational opportunities, the variety of trails proposed and the positive economic impacts this system will have on Crook County and Prineville.

But I would like to emphasize two aspects of this proposal that I am most supportive of and pleased to see in the proposal.

First, the proposal has been developed to provide a variety of experiences while still protecting and enhancing the Ochoco National Forest ecosystem. As a biologist specializing in plant ecology, I appreciate all attempts to integrate resource protection with outdoor recreation opportunities. As a former biology teacher, I appreciate the opportunity these outdoor recreation opportunities provide to get students with all kinds of interests out in our forests. It is only through the appreciation of how natural areas work that they will understand major concepts like global climate change and how they relate to the ecosystem of their local forest or natural area.

Second, I am pleased to see the needs of people with disabilities addressed with the inclusion of two trails designed for people with disabilities on adaptive mountain bikes. Although I will probably never be on an adaptive mountain bike, a brain injury many years ago has left me unable to fully participate in outdoor recreation activities to the extent I once did and given me an appreciation of the how important it is to meet the needs of those with disabilities in as many areas of outdoor recreation as possible.

Again, I fully support this project and would urge that you proceed to the next stage.
I am writing to express my support for the Lemon Gulch project. The Ochocos are an incredible place to ride, and having another area will help spread out use. There are not many opportunities for more downhill/technical riding in Central Oregon, so a trail system like this is would help fill that void. Aside from being a great recreational resource, a trail system like this will help bring much needed revenue to the local business economy in Prineville. I sincerely hope this project gets approved soon and we can get started building some trail!

Thank you,

Suzanne Marcoe
April 14, 2021
Terry Neill
Prineville, Or.
97754

Slater Turner,

Thank you for the opportunity to express my thoughts and observations in regards to the proposed Lemon Gulch Trail System Project in the Lemon Creek area.

While the plan has the best of intentions and would be well received by mountain bikers, there are always trade offs that need to be weighted against the benefits.

How will this affect the wild life?

How will this affect the grazing habits of the cattle?

How will the Forest Service monitor and police the proper use of this trail system?

If past experience is any indication, the wild life will move out of the area. The cattle that the ranchers try to keep dispersed will head downhill ending up on the creeks that we try to keep them off of. And very little monitoring will take place. Allowing some people to abuse this new trail system.

I have ridden horseback in the Mill Creek, Lemon Creek drainages and higher up in the Trail Meadow area for the past 18 years. I help with moving cattle during the summer and fall. Other times I just explore the back country on horseback. Over the years, I see less and less wild life, particularly big animals like elk and deer.

It is also becoming harder to keep the cattle off of the creeks and in their proper allotments. This is due in part because of the gates that are left open. Also dirt bikes, ATV’s and rock crawlers going just about anywhere they please. With the mountain bike trail system so close to the Green Mountain Trail, who will be there to prevent the dirt bikes and ATV’s from riding on these new trails?

The Forest Service needs to put more resources into monitoring and enforcement efforts to help stop some of these violations.

Perhaps it would serve all parties if a different location could be found for the proposed bike trail system. One that does not conflict with cattle operations and that is in such close proximity to such an active OHV trail.

Thank you for taking the time to read my suggestions and considering its content.

Sincerely

Terry Neill
To whom it may concern,

I have lived in Central Oregon for the past 5 years and have noticed an enormous need for a trail network, like the one proposed at Lemon Gulch. These types of multi-use and mountain bike trail systems in other parts of the country bring tremendous benefits to the adjacent communities and could subsequently stimulate the local economy for the city of Prineville. The development of mountain biking trails in rural communities have repeatedly proven to not only be economically successful, but successful in encouraging forest stewardship and increasing responsible recreational use. I am in full support of the creation and development of this trail network.

Thank you for your time.
Thomas Yeoman
I think this would be a wonderful addition to the outdoor community. Please make this happen if possible!

Thank you so much!
As a Prineville resident, business owner and a mountain biker I would like to voice my full support for the Lemon Gulch trail network. Aside from my active role with COTA and Ochoco Trails in bringing this network forward, I see enormous economic and recreational benefits for the local community with the implementation of this trail network.

Bend has positioned itself as a well-known mountain bike destination and has an amazing inventory of XC type trails. However, from a mountain biker's perspective there is a huge lack of more technical, steep downhill-oriented riding opportunities in Central Oregon. This is one of the most common complaints coming from riders visiting this area. Looking at many of the most popular bike destinations around the world reinforces that this is what riders are looking for when they travel. Lemon Gulch will help position Prineville as the place to go for this type of riding in Central Oregon.

Since moving to Prineville in 2013 it has been exciting to witness the growth and evolution of this town. I think Lemon Gulch and other future recreation projects in the Ochocos will play an important roll in the continuing growth of this region.
I strongly support this project! There would be enormous interest among the central Oregon mountain biking community.
Yes! This is a much needed type of riding in central Oregon. Originally being from Seattle, I sorely miss the steep technical trails. This project will help keep Central Oregon at the top of every mountain bikers travel destination list, thus continuing to drive tourism dollars to the region. I am looking forward to volunteering time to help build these trails! Also, given that the trails in the winter range will be closed during the winter months, I support having a trailhead and parking at the junction of 3360200. As it looks like that is where majority of the proposed trails lead, this should be the primary trailhead for the area. If this is a primary trailhead, we should consider having a CXT vault toilet available here as well or instead of 3360100.