

## **Minutes**

### **Crook County Natural Resource Committee**

**April 13, 2022**

**Committee Members Present:** John Dehler, Lynne Breese, Tim Deboodt, Mike Lunn, Frank Porfily, Casey Kiser, Steve McGuire, Cliff Kiser, Ston McDaniel, Andy Gallagher

**Members absent:** Trent Smith, Jace Rhoden

**Guests present:** Kevin Keown (FS), Chris Joosen (FS), Anthony Botello (FS), Slater Turner (FS), Jeff Kitchens (BLM), Amanda Roberts (BLM)

**Public Present:** Logan Blasdel, Shelley Santucci, Bonnie Sessler, Ray Sessler, Lawrence Downing, Nettie Downing, Don Vogel, Kim Vogel, Billy Ray Coffey, Frank Hook, Brittany Santucci, Stan Hickman, Nanette Hickman, Barbara and Dave Viell, Dave Nielsen, Sharon Nielsen, Gayle Hunt, Rack and Karen Rabenberg, Mark Malott, Wendy Woodley, Donna Kriege, Cheri Rasmussen, Brook Havens, Sally Jackson, Pat Clement, Gail and Dean Staniford, Scott Vaughn, Amy Stafford, Jan Oelsten, Teo Lyster, Frank Zettle, Terry Rich, Kristi Steber, Judy Neill, Terry Neill, Dorothy Perala, Lynn Troupe, Ron Wortman, Hector Garza, Deanne and Lou Popish, Stew Jensen, Greg Jackle, Petel Shay, Janice Lary, Teresa Ervin, Sean Santucci, Brad Santucci, Gary Abrams, Melinda Kestler, Mike Ervin, Ann Dill, Charles Dill, Charles Denley, Kelly Lyster, Charlie Lyster, Madeline Dresher, Calvin Hampton, John Breese, Vern and Hallie Tulare

**Meeting was called to order** at 1:00 p.m. by Chair Steve McGuire @ 4H Building.

#### **Pledge of Allegiance**

**Approval of previous meeting minutes:** John moved to approve the minutes as corrected. Lynne Seconded. Motion passed.

**Agency Reports:** Anthony Botello, Acting Supervisor on the Ochoco National Forest introduced himself. Anthony will be acting supervisor through June. Anthony reviewed a variety of activities occurring on the Ochoco National Forest (Attachment). Slater commented that permittees and FS is preparing for grazing season on the Forest. As soon as the range is ready (range readiness) cows will be turned out. Kevin Keown shared that the FS is in the last year of the Joint Chiefs Project.

John Dehler asked when the Grandview danger tree project would start? Slater responded that it will be later this spring. There is a need to get the road system in that area back to good condition before they can haul logs on the roads. There was a question about a map for the Cole Trail realignment. Anthony responded that there was a map and he would get it to Tim.

Frank asked if there were any updates on the Wild horse plan? Anthony responded that there are no gathers currently being planned. The FS is still purchasing and receiving handling facilities. There may be a chance to start gathering next year. Lynne asked about the youth programs on the forest. Chris Joosen responded that close to 80 youth have been placed on youth work crews and that there is still space for about 30 more.

Cliff Kiser asked about the hiring of fire fighters for the season. Anthony responded that the FS is still recruiting but they are close to their targets.

**Jeff Kitchens (BLM)** provided the updates for BLM. Drought conditions continue to be a concern with the grazing program this summer. Amanda Roberts reported that grazing along the John Day River is already be closed down due to the river flow dropping below 2000 cfs (7 day average).

Jeff reported that summer staff for the BLM is starting to come on-board. Fuels reduction projects are continuing and scheduled prescribed fires will move forward as long as weather permits. Jeff reported that the regional fire management agencies met recently to discuss the up-coming fire season.

Jeff reported that new law enforcement officers have been hired on the Prineville BLM District. 2 new land realtors are being hired to help with the increased workload in easement permit requests, etc. Lynne asked if there was a rough idea as to when fire season would be declared? FS responded that fire season started April 1. Jeff reminded the committee that Crook County and most of central Oregon is in a severe drought designation.

#### **Sage grouse Planning:**

Jeff provided an overview of BLM's plan to review the Sage Grouse Habitat Plan that was adopted in 2015. Letters had been sent to local governments in early 2022, asking them to participate in the planning.

Why the update? There is a need to evaluate where the BLM is in relation to implementation of the plan, the monitoring of the bird and activities related to improving habitat to avoid listing as threatened or endangered. What will be reviewed? Habitat designations and whether or not management is still valid. Should new places be designated as habitat? Are mitigation measures working? And how are multiple use issues (mining, grazing, etc) impacting the bird?

The process was kicked off in late January with letters to local governments asking if they wanted to participate in the process under the Cooperating Agency Status agreements. The CAS allows the BLM to share pre-decisions with government before formal public scoping starts. Public scoping ended on Feb 8<sup>th</sup> and now BLM is drafting up summaries of that input. Further NEPA processes will include establishing time tables, conducting more public meetings and moving forward with analysis.

#### **Lemon Gulch Presentations:**

Mike Lunn, committee member served as facilitator of this portion of the meeting. Mike reviewed the format of this part of the meeting and the ground rules for engaging in conversation. Anthony Botello started off the conversation with a FS overview of the proposed project and NEPA analysis. FS is not currently in a public comment period related to NEPA on Lemon Gulch. Anthony introduced Chris Joosen (Recreation), Slater Turner (District Ranger) and Kevin Keown (Natural Resource Staff Officer).

Chris reviewed the history of the Lemon Gulch proposal and concern about trail use conflict. 2017, the FS asked the Chamber of Commerce for help to address trail conflicts on Lookout mountain. The Chamber brought together a variety of trail users and organizations to discuss the issues. In the Fall of 2018, there was a public meeting hosted by the Trail groups to discuss issues with the public. In the spring of 2019, Ochoco Trail group presented to the FS a high level proposal for review and potential impacts. In late 2019, Ochoco trails presented a final proposal to the FS. The proposal included dealing

with expansion of existing trails (ex. Allan Creek, Bandit Springs). 3 areas for mountain bike trails were also discussed (Cougar, Potlid and Scotty) had issues that were of most concern, the Lemon Gulch proposal had the least amount of resource concerns as identified by FS personnel.

Chris shared that the Lemon Gulch project is consistent with the Ochoco Forest Plan adopted in 1989. Currently there are 187 miles of trails on the forest, 143 miles are located outside of wilderness areas and are available for mountain bike use. Lemon Gulch would be the first trail system designed specifically for bikes. Lemon Gulch would create a trail system that meets demand. Currently, bikes can go where ever they want to go.

Kevin shared with the group the NEPA process the FS is currently in the middle of for this project. NEPA was started in March 2021. Scoping was usually 30 days, but was expanded to Dec. 1. Currently, 5 alternatives by the Forest specialists are being analyzed. The draft NEPA is projected to be out by mid-June for public review and comment (30 days). Comments from this review will be summarized and analyzed followed by a draft decision notice. Slater Turner will be the decision officer and the Forest Supervisor will be in-charge of the objection review.

Slater and Anthony both emphasized that no decision for this project has been made yet. Plus, 2 more opportunities for public involvement are scheduled, 1) response to EA and 2) objection to the decision.

Kim Vogel presented information to the Committee from the Mill Creek Group who are in opposition to the Lemon Gulch project. Kim provided the Committee with a number of handouts (attached). Kim said her groups request is to have the County initiate Cooperating Agency status with the FS on this project.

Kim provided the Committee with an overview of the public participation and understanding the scope and impacts of this project. Kim shared that bike users don't pay feed for recreational use. Bikes and cows don't co-exist. This proposed trail project is a high-speed, down hill design that was not in the original intent that was discussed with the public. Kim shared that her group believes that the Community should have been more involved (ie discussions about increased motorized trail development in the early 2000's). Kim expressed concern about how the FS was involved directly with Ochoco Trails.

Public Questions related to Lemon Gulch: Mike asked those in attendance that wanted to ask questions to please write their questions on a 3x5 card provided on the back table. It is the Committee's intent to get all questions answered, and if time runs out today, then printed questions will be forward to the FS for their written response.

Logan Blasdell mentioned that there is little grazing on the Deschutes Forest, a forest that has a lot of developed recreational opportunities unlike the Ochoco Forest, which has always been managed as a dispersed recreational forest. Logan asked what the current recreational agenda is for the Ochoco? Anthony responded that the Forest trail system is well below what was the stated objective found in the Forest Plan (1989). Chris Joosen shared that Lemon Gulch is the only Mtn Bike proposal from the Ochoco Trail Group. Chris also shared that there is still a strong feeling about maintaining a dispersed

recreational plan for the Ochoco. Slater shared that if Lemon Gulch moves forward as a viable project it will be built in stages with each stage evaluated before the next stage is built.

Shelley Santucci asked if the FS had verified the organizational input (hunters, grazing, etc) that are listed as a collaborative group called Ochoco Trails. Chris Joose responded that there were people at the table who did carry the titles of hunter, grazier, etc.

Don Vogel, Mill Creek Permittee, asked who and what disciplines are involved in the FS Inter-disciplinary team? Kevin responded that the Lookout Mtn District uses all disciplines as they are available and workload allows it. Soils, range, wildlife, NEPA planner, fish, botanist, heritage, hydrology and recreation planner were represented. The analysis that this team does informs the line officer as he/she makes their decisions.

Kim Vogel asked about the scope of the project developed by the FS. What type of conversations did the FS have in-house? Other trail projects were scattered out across the forest, not tied to Lemon Gulch. The original 52 mile proposal, did the FS consider tempering the project? Kevin responded that the accumulated effects of overlapping projects in time and space will be addressed in the analysis. An example of that would be the Mill Creek Vegetation Management Plan.

Ray Sessler (permittee in the Mill Creek watershed adjacent to this project area) asked why the permittees had not been notified of this project? The first he had heard about it was Feb, 2022. His allotment includes the Bandit Springs trail and he wondered who authorized that level of ground disturbance? (Tim provided a picture of the project – picture was taken from the trail group's social media page). Ray also expressed concern about who gets called when his cows are out on the highway because some trail user left the gates open? Anthony responded by saying that the FS did miss people in the notification stage. In response, the FS has been developing a data base of people to contact in order to improve public communication.

Stan Hickman (Mill Creek resident) has lived in the Mill Creek area for 35 years. Stan expressed his opposition to the project and his desire to have the FS stop this project from moving forward. He shared that he had never been contacted by the FS about the project. Kevin restated the expanded NEPA scoping with this project during the summer and fall of 2021. Kevin shared that the FS has created a information sheet about the project and FAQ section.

Nanette Hickman shared that most of the responders to the information had known nothing about the project until neighbors started talking to one another. Nanette wondered by Lemon Gulch was the only area being reviewed by NEPA?

Sean Santucci (permittee in the primary allotment in which this trail project is located) said that they had been assured that salt grounds, water developments and common livestock trails would not be impacted by the project. A review of the map by the permittee and range con showed that the bike trails were closer to these developments than promised. Sean asked by the range alternative had been turned in for analysis prior to meeting with the permittees? Slater responded that the proposed locations of trails are just that, proposals. Analysis during NEPA could/would make adjustments depending on findings. Slater shared that the FS would do all it can to not impact range infrastructure.

Dave Nielsen, Mill Creek landowner asked if anyone thought that a reduced trail proposal (19 miles of trails) would mitigate impacts to wildlife, traffic, weeds, etc.? Anthony responded that the FS believes a reasonable range of alternatives were developed for this project and are currently being analyzed.

Discussion moved to the Committee as time was running over. Frank asked for the history of County Court involvement in this project. Tim provided the Committee with the history of Court activity regarding Lemon Gulch.

Steve shared that there was a very specific protocol for submitting comments during NEPA. Steve shared that everyone needs to get on the FS list for notification and to submit their comments appropriately. Steve shared he is continually surprised to learn about the lack of public involvement from the beginning of discussions on non-motorized trail expansion on the Ochoco's. Steve responded that the Committee is advisory to the County Court, and the Court will listen.

Steve moved:

The Crook County Natural Resources Committee advise the Crook County Court to send a request to the Ochoco National Forest to enter into COORDINATION with the Forest Service and any other pertinent federal agency, regarding the Lemon Gulch Bike Trail proposal and to advertise those public meetings prior to meeting with the FS and other federal agencies with the public being allowed to listen to said conversations between the County and the FS.

Frank seconded. Vote by the Committee was unanimous.

Mike moved to adjourn the meeting. John Seconded. Motion passed.

Meeting was adjourned at 3:45 p.m.

# OCHOCO NATIONAL FOREST ACTIVITY UPDATE

More information is available on the Forest's web pages [www.fs.usda.gov/main/ochoco/home](http://www.fs.usda.gov/main/ochoco/home) and [www.fs.usda.gov/projects/ochoco/landmanagement/projects](http://www.fs.usda.gov/projects/ochoco/landmanagement/projects)

## FOREST VEGETATION MANAGEMENT PLANNING & IMPLEMENTATION

### Ongoing Timber Sale Operations

- **Lobo Decks sale in the Wolf project area.** Operators are removing left over logs that are decked at landings from the Lobo IRSC project. This is an ongoing operation, depending on weather, road conditions, and market for this non saw wood.
- **No other timber sales are operating at this time.** Typically purchasers/operators move back onto the forest for the summer logging season in May/early June, weather and conditions dependent.
- **Grandview Danger Tree Removal Contract** being developed

### Wildfire Reforestation

- **The Ochoco's largest conifer planting effort in recent years will be kicking off after this winter storm (expected to begin 4/18).** About 1,000 acres will be planted across multiple fire areas: Bailey Butte, Corner Creek, Hammer, Cemetery, and Frog fires will be planted with Ponderosa pine and minor amount of Western larch grown from previously collected local seed sources. Native shrubs and riparian species are also planned in these and other areas. Next year reforestation efforts will continue at smaller scale.

### Grassland Post-Fire Wildlife Habitat Restoration

- **The Forest will begin implementation on a project on the CRNG that will rebuild 10 wildlife guzzlers and 4 riparian exclosures that were lost in the Emerson Fire in 2017.** Rocky Mountain Elk Foundation, ODFW, and Oregon Wildlife Foundation are all contributing financially to this project.

### Metolius Winter Range project

- **Over the winter we completed an aerial seeding application within the Grandview Fire where this project also overlapped.** In 2022, we plan to aerially seed an additional 300 acres of native seed, thin 350 acres of juniper, treat invasive weeds, and begin the grow out process for bitterbrush plants for future plantings within this project area.

### Timber Stand Improvement Contract

- **Pre commercial thinning and hand piling continues this spring in the Wolf and McKay planning areas.** This is being accomplished through a service contract and also through an IRSC (Integrated Resource Service Contract called Lobo IRSC).
- **Two large contracts have been awarded for hand thinning and piling operations to two different contractors in 2020 and 2021.** Each contract was approximately 1500 Ac. Contractors are not currently working in either area, but work is expected to begin no later than May. A third thinning contract will be advertised shortly with approximately 2,500 acres of non commercial thinning & piling (hand & grapple) . All three contracts are a mix of post-harvest thinning work, aspen restoration, and small diameter stands including plantations.

### Lower N. Fork Crooked/Paulina Creek Assessment Area

- **The Paulina Ranger District is developing a proposed action to address the need to reduce stand densities and hazardous fuels in the planning area that includes the Lower North Fork Crooked River and Paulina Creek Watersheds.** A proposed action will be scoped with the public this spring.

**Mill Creek Planning Area**

- The Lookout Mountain Ranger District continues to work on an environmental assessment. Action alternatives include between 7,800 and 12,000 acres of commercial thinning; plus noncommercial thinning, a large footprint of fuels reduction, and aquatic restoration.

**PRESCRIBED FIRE**

*Spring Prescribed Burning – If conditions allow, here are the tentative plans for prescribed burns this spring:*

- *Jackson Burn Block #1 (Jackson Planning Area) 3196 Acres. Located near Little Summit Prairie between the 30 Road and 4250 road.*
- *McKay Burn Block #2 (McKay Planning Area) approximately 890 acres. Located a few miles from the Ochoco NF Boundary up McKay between the 2705 and 2710 roads.*
- *HEJ Burn Block #14 (HEJ Planning Area) approximately 240 acres. Located next to Big Summit Prairie near the 42 and 4210 roads.*

*There will also be some practice training fires for the Redmond Smoke Jumpers and Central Oregon Rappelers.*

**AQUATIC RESTORATION**

*Lookout Mtn Ranger District and CRNG Continuation of the Upper Trout Creek Rehabilitation Project on the NW part of the Forest. Scheduled work for this upcoming field season include:*

- *~20 acres of riparian planting on Lower Auger Creek*
- *~2.2 miles of large wood additions, pool development, and floodplain reconnection on Big Log Creek*
- *~2.6 miles of large wood additions, pool development, and floodplain reconnection on Dutchman Creek*
- *2.3 miles of large wood additions, pool development, and floodplain reconnection on Cartwright Creek*
- *~2.8 miles of large wood additions, pool development, and floodplain reconnection on Potlid Creek*

**RANGE MANAGEMENT**

*Range Specialists have been working with permittees on the updating Annual Operating Plans.*

- *On Paulina Ranger District, cattle start showing up early to mid May and will be on the forest until September/October. All permittees will be grazing except one on the District and 5 allotments are being rested for resource protection.*

**RECREATION, LANDS, AND SPECIAL USES**

*Walton Lake Restoration Project Revised Environmental Assessment*

- *Ongoing litigation going through briefing in federal court. Oral Hearing in July.*

*Trail Planning & Implementation*



- The Forest Service completed an environmental assessment which analyzed relocating the Cole Loop Trail away from the target shooting area in the vicinity of Lone Pine Road, and designation of the Skull Hollow Trailhead as a day use only area. Decision Notice is expected this spring.
- The Forest continues to participate with Ochoco Trails group as they work on developing project ideas for the Grassland to address existing and growing demands for trail networks.
- The Forest Service is preparing the environmental assessment for the Lemon Gulch Trails Project and will release it for 30-day public comment period as soon as it is finished.
- A proposal for designating equestrian trails is expected to be released next fall. The Corral Flats endurance ride has been taking place on roads and unofficial trails for years. The proposal would establish trails and controls on illegal OHV use in the area.

## SUMMER YOUTH EMPLOYMENT

### Youth Conservation Corps

- *The Ochoco National Forest and the Crooked River National Grassland is Partnering with Heart of Oregon Corps and Central Oregon Intergovernmental Council to field 4 YCC crews based out of Crook County (another three out of Jefferson). 5 young people and one adult Crew leader per Crew so that would be a total of 20 young people (16-18) and 4 adults that we are hoping to employ from Crook County. Projects will vary and occur across the Forests, some examples of projects are: fuels reduction, fence, construction, repair and removal, riparian plant and shrub protection, invasive plant removal, campground maintenance, trail maintenance and fire prevention activities. Young people will also have a career day where they learn about Natural Resource careers and will receive assistance from FS staff in applying for seasonal and permanent FS/BLM jobs for the future.*

### Trail Crew

- *The Ochoco NF and Crooked River NG are partnering with HOC to provide a trail crew for young adults. This is a new program. We are working very hard to fill positions on this crew. The work will be on many existing trails throughout the Forest and Grassland and will include both daily work and spike camp work. Crews will work under the close supervision of Ochoco NF Trails and Recreation staff.*

### HOC AmeriCorps

- *This is an existing year-round program for young adults run by Heart of Oregon Corps. This year the Crews will be helping to replace fire rings and picnic tables at some of our campgrounds, repairing and reconstructing fences at Skull Hollow Campground, Sugar Creek Campground, Wildcat Campground and Elkhorn Campground. Crews will also be assisting our invasives staff controlling weeds with the application of herbicides where appropriate.*

### Central Oregon Intergovernmental Council (COIC) School year work to learn crews.

- *COIC crews now working out of and in conjunction with the Pioneer Secondary and Alternative school under the very capable leadership of Jeff Warren. This program helps young people with credit recovery and with GED all while paying a wage for hard work out on the Ochoco National Forest and getting great work done. Currently the Crew is constructing a pasture fence in the area of Williams Prairie.*



***Children's Forest of Central Oregon***

- ***This summer Children's Forest of Central Oregon is Partnering with the Ochoco N.F. and Crooked River N.G. to provide internship opportunities for young people who are part of the Crook County High School Natural Resources Career Technical Education (CTE) Program***

**Citizens of Crook County Request**  
**Crook County Natural Resources Advisory Committee**  
4/13/2022

**Our Request:**

We are here to ask the Committee to recommend that the Crook County Court formally request **Cooperating Agency** status and an **assessment of project integrity** for the **Lemon Gulch Mountain Bike Park Proposal**. This project, as proposed, if we are to believe the information that the mountain biking community puts out will change the custom and culture and rural lifestyle of Prineville. The impacts of such a large, complex, dense and intensely used mountain biking park on the county and the city should be considered commensurate with the impacts to the environmental impacts, because human impacts are just as important. Crook County has expertise and vested interest needed in this analysis and should have cooperating agency status (example 1).

**Substantial Reasoning behind our request:**

There are a number of issues with the project and we ask that the County intervene to get a clear understanding of intent as it is presently confusing in the least and most often convoluted

**Project Scope:**

- **Connected and Related Actions** - other **trail system projects** in the same plan proposed by the Ochoco Trails Alliance are related by type and impacts and the **Mill Creek Dry Forest Restoration Project** is connected by timing and geography.
- **Cumulative effects** with timing and landscape of this project along with other trails projects in previous analyses, and Mill Creek Dry Forest Restoration Project.
- **Consistency with Forest Plan**
  - huge recreation development, **bigger than most ski areas in the U.S.** and not proposed in a **recreation management area** as set forth in the **Ochoco NF Management Plan**.
  - The **Desired Future Condition** as described in the Ochoco NF Management Plan is for **dispersed recreation**. While it directs the Forest to provide more trail opportunities those would be, of course, within that dispersed recreation landscape. It does not call for highly developed mountain bike parks. No where in the Plan.
  - Breaches Forest plan standards and guides for Elk
  - Inconsistency with the **Crook County Natural Resource Policy** and thus the **Custom and Culture of Crook County** (see examples provided)

**Community Involvement**

There was no community involvement by the Forest Service. A March 20 Facebook post by the Forest Service received 3 shares and no comments. That alone should have told the Forest Service professionals that they needed to step up their efforts at involvement. There have been no public meetings held by the Forest Service to explain the proposal and especially no efforts to properly explain the large scope of the proposal, the density of the trails, the exclusive use and intensive use of the trails.

The Code of Federal Regulations, NEPA, FLPMA, NFMA, and the Crook County Natural Resources Policy all require significant public involvement. Specifically mentioning the importance of grazing permittees, adjacent private landowners, affected landowners and how they should be given special consideration and involvement.

***People were not allowed the opportunity to assimilate what a proposal of this magnitude would mean to themselves and their community.***

### **Community Identity and the Custom and Culture of Crook County**

The Crook County Natural Resource Policy, NEPA, FLMPA, NFMA, CEQ regulations and and Forest Service regulations all describe the importance of involving local communities and local governments. See attached excerpts

There is widespread concern from the ranching and agriculture communities about the spread, both sanctioned and unsanctioned, of mountain biking trails in grazing areas and the harm to these processes that have been established over time.

### **No Fee Based Management**

Repeatedly, and in comments provided during the "pause" specifically, the Forest Service was asked to incorporate and analyze a user fee system to pay for mitigation of impacts and the Bike Park management. A fee system could be structures any number of ways. In some areas it is through cooperative agreement between County and FS with fees used for management of the facility and mitigation of impacts.

This is the reason traditionally, most bike parks of this nature are located on ski areas/resorts. They charge a fee and manage the activity. Proposals of this size should be under special use permit, with associated fees for management, and accountability.

### **In Summary**

This is a project that has changed and morphed over time in the way it has been portrayed and presented. It has been presented by different entities, in different and changing ways. It has been difficult to understand, investigate, unravel, and untangle. We are requesting that the County assist the Forest Service in stepping back to take a more objective look at the mountain biking trail system, particularly Lemon Gulch, and to truly involve the Community, and those most affected. We ask that they insure that the Custom and Culture of Crook County not only be considered, but maintained and complemented by any decision made concerning trail systems in the Ochoco NF

**"It is more trouble to consult the public than to ignore them, but that is what you are hired for. " "Public support of acts affecting public rights is absolutely required."**

***Gifford Pinchot, Father of Forestry and the US Forest Service in the United States***

## Crook County Citizen Fact Sheet

Additional truths and clarifications about the Lemon Gulch Mountain Biking Complex  
4/13/2022

Many Crook County Citizens have been actively working to find out how this project got to this point without most of the community knowing about it, how it compares to other mountain biking parks and complexes across the U.S., and synthesizing what it means to the Custom and Culture of Crook County. All stats about this project have been received from the Forest Service during various meetings when seeking details and clarification. Since the project proposal appears to have been changed and clarified over time there is some confusion. What follows are additional facts.

- There are many different types of mountain biking. There are presently over 187 miles of mountain biking trail opportunities on the Ochoco NF.
- For perspective and context, this proposal is not just some benign mountain biking trails with leisurely, slow paced biking. It is a highly developed dense and intense mountain biking park with beginner (8.9), intermediate(28.6), and advanced trails(14.1), 3 parking lots, shuttling opportunity, and restrooms. The trail tread footprint is 3143 acres, making it fall right under Mt Bachelor Ski Area in size, and **larger than most ski areas in the the United States.**
- Traditionally, large mountain biking parks (most smaller than what is proposed here) on National Forest lands are located on ski areas/resorts. On a resort, the use can be managed, through the special use permit with the Forest Service. They are located there and encouraged there because of the high development, need for management and oversight and fees are charged for use so that the management needed is funded.
- This proposal came from a larger plan proposed by Ochoco Trails Alliance, which came together at the behest of the Forest Service and the Chamber of Commerce because of trail user conflicts. While this effort was a worthy and commendable effort to identify trail proposals to separate out trail uses and reduce user conflicts, it was **not** a collaborative effort including other Forest land users and was never vetted properly with the community at large to ground truth their efforts. It did not include permittees/ranchers, OHA (hunters), or wildlife/environmental groups, or the Chamber. When asked of their participation these groups/organizations clarified their participation and there was not "collaboration" on their part.
- Many hikers, equestrians, and even mountain bikers have since come forward with surprise about the project after learning of it and questioned this project and the need for such a large development.
- The need for more comprehensive public involvement (not public information and updates about the project) is needed.
- The Forest Service originally stated that the parking lots would "hold 40-45 vehicles max", both on May 27 and July 7 (Crook County Court meeting). Most recently they describe the lots as "Initial capacity will be for up to 20 vehicles". This is new information.
- In initial meetings with permit holders (well after the project proposal scoping period was over), the Forest Service "guaranteed" there would be no impact to grazing permits, yet every alternative map still shows parking lots and trails encroaching upon salting and watering areas.
- Darlene Henderson has stated that all the trails she has ridden have been located in grazing allotments and there are never any conflicts. That could lead someone to believe that all trail systems are located on allotments and there are never any conflicts. This is simply not true. Permittees have been driven off of areas and not "because they didn't want to do the work", but because the impacts and issues created by mountain bikes were cost prohibitive.

- This project does not meet Forest Plan objectives (standard and guides) for elk due to the density of the trail system. A letter from the Rocky Mountain Elk Foundation is forthcoming.
- Darlene Henderson stated in her March 22 interview on KTVZ, "If the Lemon Gulch project does not get approved, we will build trails anyway".
- Propaganda, news articles, and interviews from COTA have repeatedly said that they have or would like to sit down with those opposing the trail system. She has not reached out to any opposing party and personally spoken with them as she has stated.
- Businesses who have posted signs expressing opinions about Lemon Gulch have been harassed and threatened on social media and through repeated phone calls.
- The Forest Service has no idea what kind of use this trail system will receive. No idea. "Comparable trailheads on a nice day usually have about 10 to 20 vehicles, such as the Lookout Mountain trail." You cannot propose a state-of-the-art trail tread design in a mountain biking park larger than most ski areas and compare it to a multi-use trail system like Lookout Mountain. It is misleading and undermines trust.
- User education does not produce compliance with etiquette nor with regulation, especially when you have created a park built to increase adrenaline. Only proper management produces compliance and it costs more than the Forest is budgeted. This is an issue brought up repeatedly and there is still no alternative that addresses this issue.
- The mis-characterization of conversations in the media by the Forest Service PAO is unprofessional, slanderous, and misleading.
- Establishing a multi-use mountain bike trail system, discouraging equestrian use, and regulating dog use sometimes but not always all in a grazing allotment does not even make sense. Horses and dogs are used to work cattle. Horses, dogs, cattle, and people on foot don't mix with direction downhill mountain biking.
- Somebody needs to pick the way this project is presented. Either it is a state-of-the-art destination mountain biking complex/park with multifaceted opportunities for beginners, intermediate, and advanced bikers that will contribute significantly to the economy of Prineville and Crook County OR it is a small Prineville project proposed by Prineville bikers for Prineville bikers. It changes on the websites with the wind, signage, and rhetoric. It is difficult to chase camouflages and understand intent and goals when it is constantly changing.
- Darlene Henderson has stated that Ochoco Trails is collaborating with the Gray Mountain Grazing Association. One meeting to inform one person of plans to put mountain bike trails in an allotment does not connote collaboration. Collaboration is not happening there.

## **Connected Action under NEPA**

Connected actions are those proposed Federal actions that are “closely related” and “should be discussed” in the same NEPA document (40 CFR 1508.25 (a)(1)). Actions Proposed actions are connected if they automatically trigger other actions that may require an EIS environmental impact statement; cannot or will not proceed unless other actions are taken previously or simultaneously; or if the actions are interdependent parts of a larger action and depend upon the larger action for their justification (40 CFR 1508.25 (a)(1i, ii, iii)). Connected actions are limited to Federal actions that are currently proposed (ripe for decision). Actions that are not yet proposed are not connected actions but may need to be analyzed in the cumulative effects analysis if they are reasonably foreseeable –

COUNCIL ON ENVIRONMENTAL QUALITY Part 1508. TERMINOLOGY AND INDEX Section 1508.25. Scope.

### **40 CFR § 1508.25 - Scope.**

§ 1508.25 Scope.

Scope consists of the range of actions, alternatives, and impacts to be considered in an environmental impact statement. The scope of an individual statement may depend on its relationships to other statements (§§ 1502.20 and 1508.28). To determine the scope of environmental impact statements, agencies shall consider 3 types of actions, 3 types of alternatives, and 3 types of impacts. They include:

(a) Actions (other than unconnected single actions) which may be:

(1) Connected actions, which means that they are closely related and therefore should be discussed in the same impact statement. Actions are connected if they:

(i) Automatically trigger other actions which may require environmental impact statements.

(ii) Cannot or will not proceed unless other actions are taken previously or simultaneously.

(iii) Are interdependent parts of a larger action and depend on the larger action for their justification.

(2) Cumulative actions, which when viewed with other proposed actions have cumulatively significant impacts and should therefore be discussed in the same impact statement.

(3) Similar actions, which when viewed with other reasonably foreseeable or proposed agency actions, have similarities that provide a basis for evaluating their environmental consequences together, such as common timing or geography. An agency may wish to analyze these actions in the same impact statement. It should do so when the best way to assess adequately the combined impacts of similar actions or reasonable alternatives to such actions is to treat them in a single impact statement.

## **40 CFR 1506.6 Public involvement**

### **Agencies shall:**

**(a) Make diligent efforts to involve the public in preparing and implementing their NEPA procedures (§ 1507.3 of this chapter).**

**(b) Provide public notice of NEPA-related hearings, public meetings, and other opportunities for public involvement, and the availability of environmental documents so as to inform those persons and agencies who may be interested or affected by their proposed actions. When selecting appropriate methods for providing public notice, agencies shall consider the ability of affected persons and agencies to access electronic media.**

**(1) In all cases, the agency shall notify those who have requested notice on an individual action.**

**(2) In the case of an action with effects of national concern, notice shall include publication in the Federal Register. An agency may notify organizations that have requested regular notice.**

**(3) In the case of an action with effects primarily of local concern, the notice may include:**

**(i) Notice to State, Tribal, and local agencies that may be interested or affected by the proposed action.**

**(ii) Notice to interested or affected State, Tribal, and local governments.**

**(iii) Following the affected State or Tribe's public notice procedures for comparable actions.**

**(iv) Publication in local newspapers (in papers of general circulation rather than legal papers).**

**(v) Notice through other local media.**

**(vi) Notice to potentially interested community organizations including small business associations.**

**(vii) Publication in newsletters that may be expected to reach potentially interested persons.**

**(viii) Direct mailing to owners and occupants of nearby or affected property.**

**(ix) Posting of notice on and off site in the area where the action is to be located.**

**(x) Notice through electronic media (e.g., a project or agency website, email, or social media).**

**(c) Hold or sponsor public hearings, public meetings, or other opportunities for public involvement whenever appropriate or in accordance with statutory requirements applicable to the agency. Agencies may conduct public hearings and public meetings by means of electronic communication except where another format is required by law. When selecting appropriate methods for public involvement, agencies shall consider the ability of affected entities to access electronic media.**



**(d) Solicit appropriate information from the public.**

**(e) Explain in its procedures where interested persons can get information or status reports on environmental impact statements and other elements of the NEPA process.**

**(f) Make environmental impact statements, the comments received, and any underlying documents available to the public pursuant to the provisions of the Freedom of Information Act, as amended (5 U.S.C. 552).**

<b><u>SKI RESORT</u></b>	<b><u>SKIABLE ACRES</u></b>
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Powder Mt.	8464 acres
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Big Sky	8171 acres
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Park City	7300 acres
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Vail	5317 acres
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Heavenly	4800 acres
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Mt. Bachelor	4318 acres
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Keystone	3148 acres
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Lemon Gulch	3143 acres
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Snowmass	3132 acres
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Winter Park	3081 acres
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Steamboat	2965 acres
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Breckenridge	2908 acres
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Copper Mountain	2490 acres
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Telluride	2000 acres
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Beaver Creek	1832 acres
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Loveland	1800 acres
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Purgatory	1605 acres
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Powderhorn	1600 acres
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Wolf Creek	1600 acres
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## **Crook County Natural Resources Policy**

### **Applicable Excerpts**

CROOK COUNTY NATURAL RESOURCES PLAN REVISION 013

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### **Principles for Local Government Coordination Within Crook County**

Furthermore, both Oregon State law and FLPMA, NEPA, NFMA and other federal statutes empower Crook County to fulfill its responsibility to protect the health, safety, and welfare of its citizens:

Thus, based upon the requirements of the federal statutes, including but not limited to the National Environmental Policy Act, the Federal Lands Policy and Management Act and the National Forest Management Act, the Crook County Court asserts its ability to coordinate, require consistency reviews, **and in appropriate cases to apply as a cooperating agency in all federal decision making and land use planning processes initiated by any federal agency or state agency acting in compliance with federal law.**

### **Statutory and Regulatory Authority**

Management of the federal and state lands is dictated by a system of federal and state statutes, regulations, and policies. Crook County expects that all applicable statutes, regulations, and policies will be followed by federal and state land management agencies, and that federal and state agencies shall fulfill their affirmative responsibility to recognize all pertinent laws and policies regarding management and coordination.

### **County Involvement in Federal Land Management**

Certain federal statutes, regulations, positions and policies discussed below offer special opportunities to state, tribal, and local government agencies to participate in federal agency planning as well as decision-making when such actions take place within the purview of the state, tribal, or local government's responsibilities to the people they represent. Importantly, many such opportunities are only offered to State and local governments; they are not available to private individuals, special interest groups, or non-governmental organizations (NGO). As a local government within the State of Oregon, Crook County is therefore entitled to avail itself of these special opportunities for government-to-government involvement in federal decision-making. In accordance with federal statute and regulations, federal agencies shall recognize that certain opportunities, such as coordination as defined by FLPMA and NFMA, is exclusive to elected government units.

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"The responsible official shall coordinate with appropriate Federal, State, county, and other local governmental entities and tribal governments when designating National Forest System roads, National Forest System trails, and areas on National Forest System Lands pursuant to this subpart." 36 C.F.R. § 212.53 The Forest Service is obligated to consider and provide for "the stabilization of communities" in its decision making processes. 36 C.F.R. § 221.3(a)(3) (2009)

See also S. Rept. No. 105.22; 30 Cong. Rec. 984 (1897); The Use Book at 17.

***“Community stability” is defined as a combination of local custom, culture and economic preservation.***

**As described by the Forest Service:**

**History and Objects of Forest Reserves**

Forest reserves are for the purpose of preserving a perpetual supply of timber for home industries, preventing destruction of the forest cover which regulates the flow of streams, and protecting local residents from unfair competition in the use of the range . . . .We know that the welfare of every community is dependent upon a cheap and plentiful supply of timber; that a forest cover is the most effective means of maintaining a regular streamflow for irrigation and other useful purposes, and the permanence of the livestock industry depends upon the conservative use of the range. Forest Service Use Book - Establishment of Forest Reserves

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It is the position of Crook County to:

- engage in all such opportunities and to work in coordination with federal and state agencies as required by federal law on all projects and decisions that could affect County interests. Further, it is the express expectation of the County that federal and state agencies will give the County early notification of forthcoming decision-making and extend an early invitation to the County to participate to the maximum extent in federal decision making processes.

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**Private Property Rights and Property Interests**

Many private individuals hold either private property rights or property interests on federal lands within Crook County. These may include but are not limited to water rights, mining claims, rights of way, as well as grazing preferences and grazing permits. Such property rights and interests constitute valuable holdings, increase the County tax base, and are vital for the stability of small businesses essential to the economic make-up and culture of free enterprise of Crook County. Crook County is dedicated to preserving these rights and interests.

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**Access & Travel Management Positions**

It is the position of Crook County that:

- Roads providing access for the use and enjoyment of federal lands shall remain open year round and be maintained as needed.
- There will be no net loss to access to and across the federal lands.
- Crook County will actively work with federal agencies to discuss all road closures and shall seek an alternate route to that site.
- Roads created and/or established for timber harvesting and other forest projects should remain open as unimproved multi-use trails for recreational use.
- To keep all roads open and passable. Disruptions to the travel surface of roads (e.g. tank traps, boulders, berms, or other road surface impediments) are a hazard to road

travel in the case of firefighting, fire evacuation or rescue vehicles, and are an endangerment to the health and well-being of road users.

- All RS 2477 rights-of-way historically and currently used for any natural resource to market must remain open for public access. These include, but are not limited to, forest- to-market, mine-to-market, livestock trail ways, wagon and stage coach roads, access trails to reservoirs, streams, springs and rivers, historic sites of towns, post offices and schools, and other places of historic land uses. The County, working through its citizen committee, will research and provide the appropriate documentation of RS 2477 rights-of-way and historical site roads to the federal agencies as required by federal law. Where appropriate, informational signage shall be installed to explain the significance of the site.

- **Recreational access shall not discriminate in favor of one mode of recreation to the exclusion of others.**

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#### Crop Production Agriculture Position

It is the position of Crook County:

- To take Right To Farm laws, to the extent applicable, into account when coordinating on federal and state land use decisions.
- to support production agriculture and the conscientious use of natural resources necessary for sustaining agricultural enterprise.
- that any private property damage caused by an uncontrolled prescribed burn, other fire suppression efforts, or damage caused by any other government agency action in Crook County, shall be considered justification for compensation by the responsible agency to the private property owner at current market value.

#### Livestock Production and Grazing

Livestock production has customarily been, and continues to be, a significant contributor to the economic stability of Crook County. Livestock production contributes 51 percent of all agricultural sales in Crook County<sup>20</sup> The total reported value of livestock sales produced in Crook County was \$24,426,000.00 in 2012 (OSU Extension Service).

In Crook County, many livestock producers rely on grazing allotments administered by the BLM and the US Forest Service. **The preservation of these permits and the continuation of historic stocking rates are crucial to sustainable livestock production in Crook County. Grazing permittees and lessees possess certain and specific rights granted through the Taylor Grazing Act, Forest Service regulations and the Federal Lands Policy and Management Act which should be enforced and recognized by the federal agencies. These processes and recognitions exist separately and apart from the general public's ability as an "interested public or an "affected interest."** The benefits of managed livestock grazing for fire control, weed control, soil health, plant health, and wildlife habitat enhancement shall be recognized and incorporated into planning documents, NEPA documents, and other environmental studies and analyses<sup>21</sup>. Agencies shall take an interdisciplinary approach to range management, including soliciting input from permittees and lease holders, OSU Extension Service, the Eastern Oregon Agriculture Research Center, and Crook County in determining best approaches to maintaining sustainable use of rangeland resources.

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#### Livestock and Grazing Position

It is the position of Crook County that:

- federal and state grazing allotments and leases shall be managed through working partnerships with allotment holders and lessees, which should include joint monitoring and data collection, joint problem solving, developing adaptive management strategies, and joint development of grazing plans and NEPA alternatives for permit renewal.
- **agencies are to treat permittees and lessees with a commensurate level of participation, involving early notification of proposed actions, cooperative decision making, information gathering, and joint planning on allotments.**

...

- federal and state agencies shall not encourage or facilitate the relinquishment or "buy out" of grazing permits for non-grazing purposes.
- grazing allotments on historic and/or designated grazing lands shall remain in use for substantive livestock grazing.

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### **Special Designation Positions**

It is the position of Crook County:

- that no special designation be introduced in Crook County unless it is firmly endorsed by the local community, and the proposal has been fully coordinated with the County.

....

- **to support the multiple-use character of federal lands for the economic welfare and enjoyment of Crook County citizens and visitors. Crook County therefore opposes the restriction or elimination of customary uses on proposed or existing national monuments.**

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Recreation and Tourism Positions

It is the position of Crook County:

- **that recreational access shall not discriminate in favor of one mode of recreation to the exclusion of others.**
- **that any proposed action that includes, or considers including, any reduction of access of any kind to federal lands, assesses and mitigates the cumulative impact to recreation opportunities.**
- **that recreational activities recognized and supported by state and federal agencies shall include family oriented activities and facilities that are accessible to the general public and not limited to special interest groups.**

## **Lemon Gulch Questions – CCNRAC 4/13/2022**

**Note: While some/most of the cards were identified by name, I did not list them. I will keep the cards and if someone wants their name to be shown I'll do that.**

### **Trail designation, bike specific trails, multiuser trails and user demographics**

Not safe to have mountain bikes on same trails as hikers and horses; shouldn't be allowed.

How will putting in this bike trail stop bikers from using any of the Ochoco Forest?

One of the agency spokesman use the phrase, "mountain bike specific". The presented project report states, "creation of multi—purpose trails

Designed for mountain biking... This negates multi – use right from the beginning. Committee – wouldn't you agree?

*Most trails on the Forest were designed for pack/saddle use, and some for hiking. The design parameters are specific to that type of use; however, other non-motorized uses are allowed on most trails. There currently are no trails on the Ochoco NF that were designed specifically for mountain bike use.*

*The Lemon Gulch trails are proposed to be multiple use and open to mountain bikes, hiking, and trail running. Nationally we use a trail standards system to administer the trail design, development level, and what activity the trail is managed for primarily. In Lemon Gulch the trails would be "managed and designed" for mountain bikes. Different uses have ideal design perimeters and managing for bikes here will allow a consistent design regarding tread width, slope, turning radius, grade reversals, etc. Therefore, the features of the trail will be managed for bikes but will be open to other non motorized activities. This is common and consistent with other trails across the Forest where a trail may be managed for pack and saddle, but open to other uses. This allows for a Forest system that has specific design for maximum enjoyment and safety for unique users while offering multiple use options to all visitors.*

*The intent for this trail system is that equestrian use would be allowed. This is just one project as part of a Forest-wide effort to improve trail opportunities for non-motorized uses including horseback riding, hiking, trail running and mountain biking. Recent projects on the Forest have also increased equestrian trail opportunities near Dry Creek Horse Camp, within the Mill Creek Wilderness, and elsewhere on the Forest.*

*Part of the purpose for designing a mountain bike trail system is to provide a recreation opportunity away from local areas such as Lookout Mountain that are popular with equestrians and hikers. While in some places a shared use trail system can work, in others the increased recreation across the Forest can create or emphasize user conflict. Designing trails for a particular use along with signing so the public knows what to expect can reduce conflicts.*

There are already 10 bike trails in Cook County, we don't need more!!!

If we accept a 19 mile mountain bike trail – what GUARANTEE that in five years it won't be 52 or hundred and 52 mile trails? NO ACTION for LEMON GULCH!!

Why not develop more trails in Deschutes County

Who would be responsible to make sure these bikers don't go off trail and destroy other areas?

*In recent years, mountain biking has been increasing in popularity and overall recreation use is growing on the Ochoco National Forest. The current project is analyzing a range of miles from 19 to 52 miles (plus a no*



*action alternative) for mountain biking based on this need for additional trails and the objectives outlined in the Ochoco Forest Plan. No expansion beyond this scope can occur without another public comment and planning process.*

*An initial request that was presented to the Forest Service in May of last year by Crook County NRAC was to consider the project in phases, rather than all at once. The Forest Service agreed that a phased approach would make sense and we are designing that into the action alternatives. An initial phase would be followed by monitoring to determine if future phases are warranted and if any adjustments are necessary. General presence of Forest Service recreation crews and Field Rangers interacting with visitors as well as fire patrols would increase in the area.*

Chris stated the Lemon Gulch proposal is only 4 to 6%. It is over 3000 acres out of 15,073 which is 20% of the Lemon pasture. It goes from the north end to the south end.

*The trails would be single track non-motorized trails built about 18 inches wide. Although the entire expanse around the greatest number of miles proposed (52 miles of trail) is 3,000 acres, the actual footprint of the trails that would be used is less than 20 acres. The remaining 2,980 acres is open forested space between trails.*

*When one looks at the maximum alternative of 52 miles of trail, the full extent when considering the entire area it encompasses is about 4 to 6% of the Mill Creek Allotment, and 20% of the Lemon Pasture.*

Bicyclists are on day trips, and therefore will not be using our gas stations or hotels/motels, and generally they eat power bars, apples, and bottled water which they bring with them and would not be eating in our restaurants, or purchasing food in our grocery stores. How do you justify that they would significantly contribute to the economy of Crook County and Prineville?

*Mountain bike visitation nationally have shown to bring positive economic impact to local restaurants, lodging and shops among others. Here in Prineville, outdoor recreation as a whole is an important part of the Crook County economy. This is recognized by the County's Natural Resource Plan. Crook County Natural Resources Policy (2019, Revision 13), "[r]ecreation and tourism contribute significantly to the economy and culture of Crook County." The policy goes on to state: "It is the position of Crook County that it supports the accessibility, improvement, maintenance and development of motorized and non-motorized trails to facilitate recreation and access to natural resources for residents and visitors." This project would provide a recreation opportunity for local residents and continue to contribute to that sector of the local economy.*

If trail is approved, who will pay for it?

*With our partners, individual volunteers, youth crews, and Forest Service crew, more miles of trail are being maintained across the Forest faster than ever before. The Lemon Gulch trails would be adopted by Ochoco Trails and Central Oregon Trail Alliance to ensure they receive annual and adequate maintenance.*

What's doing with exclusive routes for bikes? Does anyone realize that Deschutes Forest ran all permittees out and now the fire problem is increased from underbrush?

To the USFS: what is your current recreation agenda for the Ochoco National Forest? Does it compare to the Deschutes national Forest with limited to no grazing permits? (Example: Bob Hershey's old grazing permit that no longer exists) quote – Ray Sessler.

*The Ochoco National Forest Plan was created specific to this Forest and not to the Deschutes NF. As a multiple use agency, the trail proposal would not exclude grazing allotments.*

*The Ochoco National Forest recognizes that Crook County (and other counties overlapping the Forest) have different recreation niches.*

*Our sustainable recreation strategy recognizes the unique dispersed recreation niche on the Ochoco. This includes camping, hunting, fishing, trail use, and other activities. Simultaneously we also have developed recreation sites beloved by the community such as Walton Lake and other local campgrounds. A new trail system adds to those niches and creates new opportunities for users without changing the historic niches on the Forest. Adding any new recreation amenities does not translate into adjacent rapid growth. Through other examples across the West, the State, and in Central Oregon there is room for multiple uses on the landscape. There is room on the Ochoco National Forest for recreational trails and supporting permitted grazing for a portion of the year that supports private ranching and family farms.*

### **Process, Collaboration, and Involvement timing**

When did FS plus COTA bring it to the CC in our advisory board for input and approval which is required by CCNR plan?

*Ochoco Trails made a presentation at a Crook County work session in January 2019. They then made a presentation to the CCNRAC in May of 2019 and asked those present to participate in the group. The Forest Service has been updating the County Commissioners and the CCNRAC on the progress of the planning. Although, we will continue to work with local leaders and put a high value on working together within communities to consider new projects like those proposed by local user groups.*

This project should be put up for a vote by the public, why can't we do that?

*There is no process for public voting on management actions on National Forest System lands. The project proposal is following the process set forth in the National Environmental Policy Act (NEPA) to review the environmental effects of the proposal and includes public involvement. The NEPA process is required by law and is our established process for analyzing effects on proposed federal actions.*

What does collaboration in Forest Service terms define?

Have you validated their claims of multi—users involvement? With Ochoco trails, Gray Butte grazing Association – not collaborating O H A – not supportive permittees – not notified/involved stakeholder wildlife groups not backing. Chris needs to check groups or individuals that initially supported trails. Still do not understand who does EA.

*Initially, there were several groups involved in both the development of the project as well as providing technical guidance. Trail user groups worked together facilitated by Ochoco Trails and held a public meeting at the Crook County Library for this proposal as well as many other proposals across the Ochoco National Forest and Crooked River National Grassland. The Forest Service has also worked with Oregon Department of Fish and Wildlife to review potential trail locations and the potential effects to wildlife. There is no set definition for collaboration specific to the Forest Service.*

*In some cases, groups or individuals participated by providing information or input.*

*As with most other Forest Service project proposals, the Forest Service prepares the environmental assessment (EA) and makes the final decision. There will be an opportunity for the public to comment on the draft EA when it is released in early Summer.*

Who/what disciplines are on the team that is conducting the analysis? How was this team chosen? Was there a public involvement professional involved, was a public involvement plan developed to actively involve the community?

Has the interdisciplinary team considered the high speed of the MTB of excess 35 mph?

Why is there no engineer on the trail FS team of specialists, given the slopes?

Why have there been no public meetings to display the bike trail proposal to the community and seek our input...

Especially when you realize the mistake of not including ranching permittees and neighbors? I don't understand why you have made no effort to involve the community, considering after three trips through town didn't have one person in favor.

The information keeps changing – Forest Service and other reporting agencies gave the public one picture and the OTSG present something much different – why? Why no communication with the public? Tribal involvement? Any fact checking of the “collaboration”?

*The Forest followed requirements of the National Environmental Policy Act (NEPA) for scoping with the public when the proposed action was developed, which included mailing lists and Forest public information releases. Tribal notification was also completed following our process with local Tribes. Public meetings are not a requirement for Forest Service projects. Regular updates and information have been, and will continue, to be provided to the County Court and CENRAC. For those interested in hearing about public comment periods on proposals, please sign up for the Ochoco National Forest NEPA mailing list on our website:*

*<https://www.fs.usda.gov/projects/ochoco/landmanagement/projects>*

*The Forest Service is currently conducting an analysis of the potential effects from the proposed trails system. The effects will be disclosed in an environmental assessment (EA). Professional expertise, including engineering, is available to design the project to specific standards. Agency trails professionals have the expertise to design trail systems taking into consideration slope, soil types, hydrology, etc using established design criteria and standards. As needed, specialists consult across resources for professional expertise in areas such as engineering and other affected specialties including water quality, sensitive plants, wildlife habitat, and soils.*

The Bend Bulletin – publication of record – why not Central Oregonian because FS actions affect Cook County NOT Deschutes County. Fish and wildlife reports (comments) not mentioned or included. Terms “proposed” trails Slater speaks/approves of trails?

*The Bend Bulletin has been the paper of record for a few decades. Per federal regulation we publish legal notices when there is an official 30-day public comment on an environmental assessment. The Bend Bulletin has large circulation in central Oregon including in Prineville. The Forest Service will publish a legal notice in the Central Oregonian newspaper in addition to the Bend Bulletin when the 30-day public comment period commences.*

*The Forest Service is conducting an environmental analysis of the proposed trail system and will document anticipated effects to fish and wildlife habitats among other resources. See graphic of the status of the NEPA process. Following the release of the environmental assessment, the Forest Service considers comments,*

*updates analysis as necessary, and issues a draft Decision Notice. The public has an opportunity to seek administrative review of the draft Decision Notice. Once that review is complete, a final Decision Notice is issued.*

Why was the range of alternatives turned into Slater without permittee input on it? Salt grounds were not taken into consideration or water and trails used for livestock.

Why were the salt grounds, water developments, and the grazing patterns not considered? And why was the range alternative handed in without permittee input?

*The Forest used information provided by the permittees to our Range Specialists in developing the range of alternatives. The range of alternatives being analyzed variously reduce the amount of trails and trail density in proximity to range uses and infrastructure. The Forest is looking at alternate trailhead ideas and has identified some alternate trail routes that would avoid areas more heavily used for livestock. We hope that the permittees will review and comment on these options when the EA is presented.*

Is the pause over? We haven't been notified as you said you would. When was the public notified of the pause start and the pause ending? Why did the pause happen? We don't see any of that on your website – and we haven't seen our comments addressed.

*The County, through their Natural Resource Advisory Committee requested that the Forest pause the process to allow greater opportunity for public involvement. This was also made clear to affected permittees by the District Ranger and Forest Supervisor in individual meetings. To help clarify information, a FAQ was created in order to help the public understand where we are in the process. The Environmental Assessment (EA) which will have the environmental analysis is being worked on by resource specialists. Comments and concerns pertinent to the environmental review that we've received to date will be addressed in the EA.*

### **Need, Project Specifics, and Effects Analysis**

Why the decision to pick this particular FS area (9 mi.<sup>2</sup> in Mill creek watershed drainage area – bad decision for multiple reasons)?

*More information on this topic will be provided in the environmental assessment, to be released in early summer. The project location provides a combination of appropriate terrain and proximity to town, and accounts for forest-wide objectives for big game habitat.*

What hard data has been compiled to even show a need?

*The need for this project comes from the trail management objectives in the Forest Plan as well as the increase of recreational use and trail user conflicts as observed by Forest Service employees and local user groups.*

*Forest managers anticipate continued recreational visitation to increase in Central Oregon. User created systems do not consider all impacts and potential unintended outcomes and typically come at the expense of many natural resources. Providing trail systems through an analysis process when the need is growing*

*allows them to be placed on the landscape after weighing all concerns such as range, wildlife, botany, aquatics and fisheries, etc.*

Thank the Forest Service for attending meeting in person. Does anyone here believe that choosing the 19 mile alternative would substantially mitigate traffic or impact on the ecology of the area? FIRE – Extreme danger now and predicted for future. Is it wise to increase probability of wildfires in Lemon Gulch and the Millcreek watershed?

*Non-motorized trails are generally not a source of human caused wildfire. Human caused fires from recreationists are more typically from sources such as abandoned campfires, discarded cigarettes, and dragging of vehicles tow chains. General presence of Forest Service recreation crews and Field Rangers interacting with visitors as well as fire patrols could increase in the area.*

Why isn't the current proposal an EIS especially given the current Oregon Wild recreation proposal?

*This project proposal is not connected or related to Oregon Wild's proposal to create a National Recreation Area within the Ochoco National Forest. The Lemon Gulch trails project is being documented with an Environmental Assessment which is used to determine if an Environmental Impact Statement is warranted.*

### **Project feasibility and management**

Who is going to manage this area?

With the density of trails and intensity of proposed use on the trails, why has there not been a recreation management plan? Including fee systems to pay for unfunded mandates? At skull Hollow meeting Forest Service and BLM indicated no funds for toilet paper.

*The area would still be under management of the Ochoco National Forest. The Forest follows the Ochoco National Forest plan for guiding direction on project proposals. As with other trail areas, the Lemon Gulch trails would be adopted by Ochoco Trails and Central Oregon Trail Alliance to ensure they receive annual and adequate maintenance.*

Have you ever heard of Mount Emily recreation area and reached out to them about all the good and bad that come with the non-motorized trails? Do they have grazing? How well does or did it or didn't it work out? Traffic disturbance to property owners next to Mount Emily recreation area. <https://www.meetmera.org/blank-q17v5>

*The Mount Emily recreation area includes a greater level of recreation development including 90 miles of both motorized and non-motorized trails, a free campground, and archery range. That recreation area includes more development and is not comparable in scale to the 52 miles or less of non-motorized trails and small parking areas proposed in the Lemon Gulch project.*

What are (or have you done) to evaluate the long-term impacts that the Lemon Gulch project will the project have on the long-term future of the Prineville community? (I.e., the impact that Mount bachelor had on the Bend Metropolitan mess)? "If you invite them, they will come over and many who come will stay and they will change your WORLD!! Has there been any investigation into the "impact" this would have on the town of Prineville?

*The potential for a new trail project to impact the Prineville Community will be assessed in the EA. Public input on this project varies from strong support for additional non-motorized recreation opportunities to community members who are concerned that it could increase traffic or bring in folks from outside the area.*

*As the community of Prineville and Central Oregon as a whole grows, the Forest Service aims to proactively manage resources in light of this population growth and provide for recreational opportunities for growing populations as a result. Crook County continues to be one of the fastest growing counties in Oregon and as federal land stewards, we address current needs and also aim to be ready for the increase of recreationists.*

*A ski area such as Mt Bachelor is far more highly developed than this proposed trail system and cannot be assessed as comparable recreation projects. The proposed Lemon Gulch trails are about 18 inches wide which does not compare to downhill ski runs that are often over 50 feet wide and involve clearing all the timber and removing the canopy, require vastly more erosion control, annual mowing of grasses, have scenic value impacts, etc. Western ski areas also include multiple chair lifts, very large paved and gravel parking areas accommodating 4000-4500 vehicles (Bachelor), regularly use explosives and artillery for avalanche control, shops, require large flush wastewater systems, have lodges and restaurants, see daily snowcat grooming, and more. None of these amenities are proposed at Lemon Gulch.*

### **Other Comments/Questions**

I'm a hunter. I'm prohibited from using motorized means to recover game. I have a weak heart, missing alone, arthritis, 69 years old. I can barely walk uphill. If I can't use my pickup to recover game, why can bikes destroy 52 miles of habitat?

*This project is reviewing non-motorized trails on the Forest. Motorized vehicles have different impacts to the land and are governed by additional rules that limit travel off designated roads and trails.*

Why wasn't the reason that this area only considered for helicopter logging 50 years ago – that was not a flippant decision?

*This comment seems to be referring to the last vegetation management entry into the Mill Watershed for thinning and fuels reduction. The Mill Project EIS was completed 23 years ago in 1999. At the time the Forest considered using helicopter logging to reach some units because of their location on steep slopes; however, those units were not implemented because they were not economically viable. The Forest Service is concurrently working on an environmental analysis for thinning and fuels reduction in the Mill watershed. Subscribe to the mailing list on our website if you are interested in receiving project updates:*

*<https://www.fs.usda.gov/projects/ochoco/landmanagement/projects>*