



Via: <http://cara.ecosystem-management.org/Public/CommentInput?project=47019>

March 18, 2020

Slater R. Turner, District Ranger
Ochoco National Forest
3160 NE 3rd St
Prineville, OR 97754

Dear Mr. Turner:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to provide comments on the Walton Lake Restoration Project (Walton Lake) Environmental Assessment Revised (EA revised).

The American Forest Resource Council (AFRC) is a regional trade association whose purpose is to advocate for sustained yield timber harvests on public timberlands throughout the West to enhance forest health and resistance to fire, insects, and disease. We do this by promoting active management to attain productive public forests, protect adjoining private forests, and assure community stability. We work to improve federal and state laws, regulations, policies and decisions regarding access to and management of public forest lands and protection of all forest lands. AFRC represents over 50 forest product businesses and forest landowners throughout the West. Many of our members have their operations in communities adjacent to the Ochoco National Forest, and the management on these lands ultimately dictates not only the viability of their businesses, but also the economic health of the communities themselves. The state of Oregon forest sector employs approximately 61,000 people, with AFRC's membership directly and indirectly constituting a large percentage of those jobs. Rural communities, such as the ones affected by this project, are particularly sensitive to the forest product sector in that more than 50% of all manufacturing jobs are in wood manufacturing.

Purpose and Need – Public Safety

AFRC has supported the proposed work to improve public safety in the Walton Lake Project area from the original onset of the project in 2015 and appreciates the expanded Purpose & Need in the EA revised. AFRC suggests that Forest Service resource specialists and public affairs specialists work to create a one or two page summary of the Walton Lake project that

frames the proposal in common language. The *primary purpose* of the Walton Lake project is public safety. The public safety aspect is why the treatments are being considered. There are certainly quite a number of ancillary benefits that will benefit the Walton Lake area, however it is unlikely that these treatments would be implemented in the absence of the overriding need for public safety. Creating a summary for wide public dissemination with appropriate graphics and language that focus on the positive recreation aspects with minimal scientific jargon would be helpful. A review of the 2019 scoping comments on Walton Lake reveals that less informed stakeholders do not understand why entering the area every year to remove a few trees for safety is no longer a viable alternative. Any options that would require removing only a few trees every year, inspecting the roots of all the trees every year, and limiting the scope of the laminated root rot removal within the developed recreation area are not feasible from both an operational and economic standpoint.

Purpose and Need – Community Wildfire Protection Plan

The Walton Lake developed recreation area is identified as critical infrastructure within the Wildland Urban Interface in the Crook County Community Wildfire Protection Plan due to public safety concerns related to the significant number of visitors to the area, particularly throughout the summer and fall when burning conditions are at their most severe. The Walton Lake Campground and Day Use Area were evacuated in the summer of 2014 due to public safety concerns related to multiple wildfires in the vicinity. Implementing the No Action Alternative, or any of the three alternatives above, is not viable due to these critical safety concerns in the Walton Lake Project area.

Purpose and Need – Forest Plan Amendments

Since the Walton Lake Project area is entirely within Ochoco National Forest Land and Resource Management Plan (LRMP) Management Area MA-13, Developed Recreation, and the emphasis within MA-13 is to “provide safe, healthful, and aesthetic facilities for people to utilize while they are pursuing a variety of recreational experiences within a relatively natural outdoor setting” the treatments proposed are appropriate. MA-13 also directs that “timber activities may be used for safety and visual enhancement” and timber harvest may be used within developed site areas for the purpose of “maintaining safe and attractive recreational sites,” and within the visual influence area of developed sites to “meet visual quality objectives and maintain healthy stands.” In addition, the LRMP indicates that within developed recreation areas, ponderosa pine should be managed to encourage “large trees and open park-like stands,” while mixed conifer should be managed to provide a mix of species and maintain western larch; views of scenic features such as aspen stands should be provided.

The use of four site-specific Forest Plan amendments to implement the Walton Lake Project is both legal and appropriate as described under the Purpose & Need. The National Forest Management Act authorizes the Forest Service to amend a Forest Plan in “any manner whatsoever.” 16 U.S.C. § 1604(f)(4). The need for the forest plan amendments is to 1) remove trees that are equal to or greater than 21 inches at diameter breast height (dbh), 2) conduct sanitation operations within late and old structure (LOS), and 3) create regeneration units larger than may be visible to the casual observer that is tied to both public safety and the best available

science. Without the use of these site-specific forest plan amendments this project will not achieve its public safety or forest health goals.

Alternatives

AFRC recommends that a fifth alternative, Alternative 5, be prepared that would permanently close the Walton Lake recreation area to the public for an indefinite time. The effects to the County, to the recreating community and to the natural resources of the area should be analyzed.

AFRC fully supports Alternative 2 the Proposed Action. This alternative best meets the Purpose & Need and is the most cost effective use of the public's money for the public's benefit. Alternatives 3 and 4 would provide some benefit but do not adequately meet the safety need. Signing and closures in the heavily infected laminated root rot areas do not protect the public that recreates in these areas. Signing most likely does not remove the Forest Service's liability, especially since the Agency is well aware of the existing safety issues. Further, the trees infected with laminated root rot will continue to decay and fall over and create increased fuel loads with the associated hazards.

Please feel free to contact me if I can assist you in any way with moving forward on the implementation of Walton Lake. The need for public safety is critical.

Sincerely,



Irene K. Jerome
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