Blue Mountains Biodiversity Project

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Blue Mountains Biodiversity Project comments on the Revised Environmental Assessment for the Walton Lake Project by Karen Coulter

The Need for an Environmental Impact Statement Instead of an Environmental Assessment:

The Environmental Assessment is acknowledged to be used not only to disclose more analysis but to determine whether preparation of an Environmental Impact Statement should be required.

The revised Environmental Assessment for the Walton Lake project still fails to disclose scientific controversy over the efficacy of standard methods of commercial logging to reduce root rot. This is despite the fact that Ochoco Forest staff members showed a slideshow at a past Ochoco Collaborative group meeting (which I attended) that revealed the environmental impacts and uncertain effectiveness of a Canadian experiment that clearcut a root rot affected area and removed all the stumps and tried to remove all the root systems to clear the soil of root rot fungus. The Forest Service staff conclusion at the presentation was that this was a very expensive procedure with obvious severe environmental impacts. Further there was not yet any evidence from this experiment that proved that root rot could be removed from the soil enough to prevent future root rot infestation in the same site. This presentation by Ochoco Forest staff did not encourage the use of clearcutting and trying to pull out all stumps and root systems, which high quality science not being used by the Forest Service finds would be necessary to try to free the affected area from root rot.

Science that found that logging actually spread root rot was submitted to the Ochoco Forest Service staff by Dr. Chad Hanson, Ph. D. as part of his comments during earlier comment periods for the Walton Lake project and we referenced this high quality science in our Blue Mountains Biodiversity Project comments on the Walton Lake Project. However the Revised EA for Walton Lake still fails to disclose and analyze this science that refutes the efficacy of the planned clearcut-intensity "Sanitation Harvest" that would leave stumps and root systems infected with root rot in place. Thus the Walton Lake proposed action is inconsistent with the foundational purpose and need stated for the project of reducing root rot incidence and thus improving public safety regarding potential falling trees due to root rot.

There are also other significant omissions in the revised Environmental Assessment. These include failure to meet NEPA requirements for full public disclosure by not revealing that the past history of this timber sale includes the Forest Service fully marking the timber sale to be logged, including trees being paint marked to cut or leave, sale unit boundary signs being posted, and flagging to indicate components of the sale such as skid trails—and putting out and executing a contract for selling the sale

to a timber company—all before any final decision on the Walton Lake project. This process is illegal. Full public disclosure is necessary because the timber sale is still all marked to be sold and this could be a motivating factor for the Forest Service to persist in pushing this sale since 2016 despite having already been defeated twice and despite inherent violations of the Forest Plan that would be involved to implement the sale as proposed.

Further, public disclosure of the laid out and marked timber sale is needed because all of the proposed alternatives for the sale except the proposed alternative under the revised EA—including No Action—include maintaining the closure to public entry encompassing the root rot sale units, where the largest old growth fir trees planned for logging are likely marked to cut. Thus the motivation for maintaining the closure to public entry in all offered alternatives may not just be motivated by concerns for public safety, but also by the Forest Service desire to hide the large old growth fir trees marked to cut and all the other evidence of a timber sale ready to be sold in this area and/or Forest Service reluctance to have to re-mark the trees and take down the sale unit boundary signs and flagging. However if the re-marking to eliminate timber sale readiness is not done, then we are left to wonder if the Forest Service is still planning to get this sale logged at some future date regardless of which alternative is chosen for the Walton Lake project.

Further, leaving all the evidence of a timber sale ready to be logged within the Walton Lake area is contrary to Forest Plan Developed Recreation Management Area emphasis on maintaining "a relatively natural outdoor setting" for recreation. For that reason alone, the Forest Service should have fully analyzed and disclosed what the continuance of the public closure would entail in regard to environmental impacts and effects to the recreational experience at Walton Lake. Yet the impacts of leaving a timber sale marked and ready to be logged to the recreational experience and that being a possible reason for maintaining the closure to public entry in all alternatives except the proposed alternative are not disclosed throughout Chapters 1, 2, or the Recreation section of Chapter 3 of the revised EA if not in the entire EA. Of course the closure also means that the public would no longer be allowed to explore that portion of the Walton Lake Developed Recreation area forest setting, which is acknowledged in the Recreation section of Chapter 3 with one sentence: "A public closure that would remain indefinitely is in contrast to providing for the access and enjoyment of recreation within its boundary." (Revised EA on both page 59 and page 60) The threat of an indefinite public entry closure is used to leverage support for the proposed action as the only alternative under which the public closure would be lifted: "There would be a long-term benefit to camping and recreation in the project area because the closure of 35 acres would be lifted" (Revised EA p. 58 in reference to effects of Alternative 2.)

There is the additional unanalyzed issue of substantial fines associated with closure violation (noted in very small print at the bottom of the Walton Lake Project sign at the entrance to the campground.) Would these fines of $1,000 for individual violation of the closure and $10,000 for an organization's violation of the closure still be enforced, and if so, why? Are there other reasons for these fines beyond deterrence to entry regarding public safety? Without full disclosure of realities within the closure and motivations for continuing the closure and whether or not the large fines would still be applied, the public is not fully informed. Due to this lack of disclosure, the public cannot submit fully informed comments on the revised EA regarding any concerns they may have about leaving the timber sale marked to cut, the logging of very large old growth firs within the closure area, the continuance of the closure to public entry, and the associated heavy fines for violation of the closure. Throughout chapters

1 and 2 and the Recreation section of Chapter 3 of the revised EA, I saw no disclosure of the issue of fines for public entry of the closure, only mention that the closures would stay in effect under all alternatives except for the Proposed Action alternative.

Another unanalyzed issue is the EA's failure to consider that leaving the Developed Recreation site in an altered state (the marked and flagged timber sale) and with a public entry closure and associated fines does not represent a true No Action alternative, which is supposed to represent the status quo condition and management of the area prior to the proposed timber sale or other new management currently proposed, according to NEPA.

These are striking omissions for an Environmental Assessment prepared to address the deficiencies of the prior EA. Due to these persistent problems of incomplete public disclosure, inadequate analysis, failure to disclose scientific controversy, and failure to represent the full range of high quality science, the Walton Lake Project should either be cancelled altogether and the signs of prior timber sale marking and flagging fully removed, along with cancellation of the public closure and associated fines, (our preference) or a full Environmental Impact Statement should be prepared with a new 45 day comment period that corrects all of these deficiencies, with much greater outreach to the public for public comment. Greater public outreach should include visible, high profile outreach to recreational visitors' home towns and cities, including Portland and Eugene, and to recreational organizations throughout the state.

The Revised EA also failed to disclose parts of the history of the planned timber sale that make the Forest Service proposal look bad to the public. This includes the timber sale (aka "project") being originally planned as a Categorical Exclusion to rush it through with very little public notice or ability to respond, and that effort being defeated. The Forest Service does not disclose that we had to force them to prepare the original Environmental Assessment, in order to get the Forest Service to more fully disclose potential environmental impacts and give the public more opportunity to comment, file objections, and negotiate with the Forest Service to achieve a more acceptable outcome. Yet that EA was also very deficient in analysis and disclosure of relevant information, which is where the Forest Service account of the background of the project begins. While there is a footnote on EA p. 1 that acknowledges the original decision memo in December 2015, there is no mention of this Decision memo being associated with a Categorical Exclusion, which is designed to speed up implementation of projects with insignificant effects rather than to heavily and extensively commercially log a popular recreation area where the management emphasis is to maintain a relatively natural outdoor setting for recreation, not logging.

The Revised EA also fails to mention that the sign later posted near the campground is very misleading when compared to what is bluntly admitted within the project record to be a 40 acre (now 35 acre) clearcut in the root rot area that would never look the same afterwards. The sign only disclosed that "commercial thinning" would take place and that it would be unnoticeable, omitting the clearcut appearance of planned "Sanitation harvest" that was planned to occur adjacent to the loop road and would be visible from the loop road, the lake, and one of the campgrounds, as well as from the Round Mountain hiking trail segment. The sign includes notice of the associated fines for public closure violation in miniscule type like a foot note below the much larger type of the rest of the sign.

NEPA

Inadequate Analysis:

The Revised EA does not use detailed analysis to disclose the benefits of letting the natural disturbance functions of laminated root rot take place, based on high quality science, such as naturally thinning the forest, providing snags and down logs for wildlife foraging, and contributing carbon and other nutrients to the soil, as well as providing for long-term storage of carbon in the resulting snags, logs, and soil enrichment, which helps reduce the effects of extreme climate change. Such analysis is needed both to provide unbiased analysis of environmental impacts and to prompt the needed disclosure of negative impacts of planned logging to all these ecological benefits derived from root rot natural disturbance of the forest. Fir snags and logs are especially valuable to Pileated woodpeckers and Black bears for foraging for insects because they are soft, decay rapidly, and are a more reliable and readily replenished source of soft snag and log foraging due to firs' susceptibility to root rot and other diseases. However the Revised EA focuses on extolling the benefits of planned logging at the expense of not disclosing the negative impacts. This is contrary to NEPA requirements for full disclosure and detailed analysis that fully informs the public of environmental impacts.

The stand density claimed by the Forest Service to be increasing wildfire risk could easily be mitigated by only small diameter thinning (generally up to only 6-8" dbh) where needed and some prescribed burning in the dry mixed conifer. This would cause little detrimental effect to recreational, scenic, and wildlife values compared to the planned heavy clearcut-style logging of "Sanitation harvest" and the extensive commercial thinning with removal of large trees across much of the rest of the recreation area. Based on our field surveying of all of the proposed sale units, there is no excess density of mature and large trees, as the Walton Lake area has evidently been thinned in the past, as well as having received repeated hazard tree felling over many years. Yet the Revised EA omits this information and thereby avoids considering only noncommercial small tree thinning by hand and prescribed burning as a viable alternative.

We were hard-pressed to find any significant evidence of large fir "crowding" older legacy Ponderosa pine and Western larch as claimed in the Walton Lake project area due to past thinning, past hazard tree felling, and in the case of the root rot area, either heavier past logging or a possible past fire. The majority of the Revised EA portrayal of the existing condition in the Walton Lake area is consistently biased through omissions of relevant information and promotion of the proposed action.

No apparent Climate Change analysis:

The Revised EA also fails to analyze the impacts of the Walton Lake project to climate change and cumulative impacts from extreme climate change to the Walton Lake area when combined with the planned intensive logging of mature and old growth moist forest and extensive logging of large trees, which are clearly contrary to IPCC recommendations for reducing climate change effects as well as contrary to other high quality increasingly calling for protection of mature and large trees from logging to retain needed carbon storage and carbon sequestration.

Purpose and Need:

NFMA

Violation of Forest Plan Management Area standards and guidelines:

The proposed actions would violate the Forest Plan by failing to emphasize recreational aesthetics and to maintain the requisite "relatively natural outdoor setting" rather than a conspicuously heavily and extensively logged outdoor setting. Evidence of logging of mature and large trees (and their absence) would be evident throughout most of the Walton Lake area, including areas visible from the lake, both campgrounds, the day use area, and the loop road around the lake.

The Forest Management Area emphasis for Walton Lake does not call for "a healthy stand of vegetation" but for a "relatively natural outdoor setting." Extensive and intensive logging planned within the Developed Recreation area would conflict with the need to maintain a relatively natural outdoor setting for recreation.

Long-term management objectives of the Developed Recreation Management Area are being fabricated out of thin air, as the Forest Plan does not call for logging to be emphasized (or visible) or for long-term artificial conversion of the natural mature and old growth moist mixed conifer stand to a dry Ponderosa pine/Western larch seedling replanted clearcut (which would become a maintained even-age plantation.)

Re: purpose # 2 (on Revised EA p. 11), the dry mixed conifer stands appear to be healthy now. The only higher density is small patches of small trees that could be noncommercially thinned by hand with little impairment of scenic and recreational values. However higher density of small trees is not consistent across the area and where it does exist in small patches, these currently provide screening for campsites, hiding cover for wildlife, and a desired recreational attribute of variable tree sizes and variable tree density, as well as tree species diversity.

The improvement of "survivability of large trees into the future" is not attained by logging existing large trees and mature trees that would otherwise grow into large trees. This is an obvious conflict between the proposed actions and Forest Plan goals.

The apparent after thought of "enhancing" hardwood species is the only restoration component of the Walton Lake Project, which is evidently included so as to be able to call the timber sale a "Restoration" project. Calling this plan for Walton Lake a "restoration" project does not pass the giggle test for authenticity. Enhancing hardwood species could be accomplished simply by planting them where there is a deficit and non-commercially thinning only small trees (up to 6-8" dbh) where needed to increase sun access where riparian hardwoods would naturally grow. No commercial logging is needed. There are already nice areas of hardwoods; this is hardly a noticeable "need" at all.

NEPA

Inconsistency of proposed management actions with the stated Purpose and Need:

The proposed actions in sale units 2, 3, and 4 (the root rot area) are inconsistent with the stated "need" to "curb" the laminated root rot infestation, as logging and ground disturbance will spread the root rot. The root rot will not be significantly reduced since there is no plan to remove stumps and root systems and soil already infected with root rot. Further, the planned artificial tree species conversion to timber industry-preferred Ponderosa pine and Western larch to eliminate fir "host" trees susceptible to root rot is not likely to be successful.

Not disclosed or analyzed in the Revised EA are multiple problems with the proposal to convert the existing mature and old growth moist mixed conifer stand to a virtually clearcut re-planted dry conifer stand: First, this is a naturally moist mixed conifer stand due to geological, hydrological, and topographic conditions that will not be changed. This moist mixed conifer stand is situated on a North aspect slope facing the rising moisture from Walton Lake and near tributary streams and seasonally wet areas. The soils are largely ashy, which contributes to moisture retention. Fir will inevitably grow back into the stand and the Ponderosa pine may not do very well, as this is an inappropriate site for Ponderosa pine except on the drier edges and ridgeline where they already exist.

Likewise, the drier mixed conifer area has South and West aspect slopes and more clay soil. However it is evident that the drier mixed conifer also has historic old growth Douglas fir (and some large old growth fir stumps), so logging of large firs is not warranted.

Second, commercial logging (and leaving stumps and root systems of the fir "host" tree species logged in the ground) will not prevent firs from growing back. Third, the Forest Service would be increasing the risk of wild fire in the Walton Lake area by drying out the root rot stand site by removing shade-contributing firs (most of the trees); reducing overall moisture retention by removing shade and down wood; increasing wind speeds through the stand, which increases fire intensity; and by reducing greatly the number of mature and large more fire resistant trees.

NFMA

<u>The Forest Plan Amendments are not site-specific or unique and are being driven by the Proposed Action to allow for violations of the Forest Plan:</u>

The supposedly benign intent of the Forest Service to protect public safety, maintain "forest health", and reduce wildfire "risk" in accordance with the Forest Plan is highly suspect when they deem four Forest Plan amendments to be necessary to implement their Proposed Action alternative. Apparently the cart is driving the horse, as the Forest Service's desired alternative is driving the presumed "need" to amend the Forest Plan in four different ways. Instead the Forest Plan should be guiding the Forest Service in how to manage this specially designated Developed Recreation Area and spurring the development of alternatives that avoid violations of the Forest Plan and other applicable laws.

How is it that all laminated root rot "host species" (all fir) are now considered necessary to remove, including large trees? The Revised EA states the following: "The forested vegetation and understory are key components of the recreational experience at Walton Lake. Large old trees, often referred to as legacy trees, are particularly important to the character of the site." (EA p. 54) The reality is that laminated root disease has likely always (for millennia) been in the moist mixed conifer forest, which includes within the Walton Lake area as well as the moist mixed conifer forest across the rest of the Ochoco National Forest. Removing large old trees, as planned for sale units 2, 3, and 4 would remove trees "particularly important to the character of the site." The forested vegetation and understory would no longer look as natural or beautiful after planned logging though they are "key components of the recreational experience at Walton Lake."

Grand fir is not "young" up to 21" dbh, as characterized in the Revised EA, but is likely at least mature and mostly 80 to 100 years old, based on the coring of Grand firs not much greater than 21" dbh in the Wolf timber sale on the Ochoco National Forest which were mostly 100 to 130+ years old. Logging all

root rot host trees, including those over 21" dbh, would also involve logging old growth Grand fir and Douglas fir (which are not specifically protected in sale units 2, 3, and 4) and more fire-resistant large fir trees, including Douglas fir, which is more fire resistant than Grand fir. Nothing has changed since the Eastside Screens were enacted in 1995 except a lot more logging, as well as wildfires. There is still a big regional deficit in large trees and needed large tree structure across Eastern Oregon and the Ochoco National Forest due to past over-logging of large and old trees and continued incremental reduction in large trees through hazard tree felling and other large tree logging that was not stopped.

Basal area reduction desires (Revised EA p. 12) are hardly a sufficient argument for violating the Eastside Screens and the Forest Plan. There is nothing unique or site-specific about the Forest Service desire for basal area reduction, which appears in almost every current and recent timber sale proposal across the Ochoco National Forest and other Eastern and Central Oregon National Forests.

Why is legitimate immediate hazard tree removal suddenly not considered sufficient, even though it has been successfully used by the Forest Service in the Walton Lake area and throughout the rest of the Ochoco National Forest? Could it be that this is due to direction from a shift of the U.S. government politics to extreme right wing extraction mode and orders for much higher timber sale volumes? This is still an old growth and large tree timber sale gift to the timber industry under the guise of "addressing" root rot. Thus the haste in trying first to ram the sale through with a CE and the lack of disclosure to the public of clearcutting acknowledged in the project record and of the science that finds logging to spread root rot, not reduce it. This would also help explain the disingenuous misleading of the public on the sale's information sign by the campground entrance and the Forest Service pushing this timber sale in a popular recreation area despite years of public opposition blocking it. Funding was already poured into marking the sale, which has been already granted to a logging company before the final decision, which is illegal.

<u>Failure to use High Quality Science:</u>

On the Malheur National Forest, in contrast, the largest known Armillaria root rot area is now being excluded from logging (which was proposed in the past) and promoted as a Forest visitor destination, based on high quality science and scientific interest in the site. I personally met a family from Europe last summer who were traveling and camping in a recreational vehicle and looking for the Armillaria root rot area nearby as one of their recreational and science interest destinations.

The full range of high quality science does not dictate the need or efficacy of removing all host tree species in order to "address" root rot. This is actually a novel strategy that has not necessarily proven itself. The proposed action would not include removing all the root rot-affected stumps, root systems, and soil, so it would likely spread root rot through the soil rather than reducing its incidence.

<u>These are not really site-specific or unique Forest Plan amendments, as the root rot situation described is not unique to the Walton Lake area, but common throughout the Ochoco National Forest in moist mixed conifer forest</u>. Both laminated root disease and trees competing with each other for water, nutrients, or sunlight are natural parts of the forest ecosystem and widespread across the entire Ochoco National Forest, as well as other Eastern and Central Oregon National Forests. The Forest Service's perception that younger and large firs are causing competition stress for older Ponderosa pine and Western larch, increasing the risk of individual old Ponderosa pine and Western larch dying due to insects, drought, or wildfire is repeatedly used as a justification for commercially logging large fir in

multiple timber sales (e.g. the Wolf sale on the Ochoco National Forest, and, at first, the Black Mountain sale on the Ochoco National Forest—see the Black Mountain sale's Final Decision rationale for not using a Forest Plan amendment to violate the Eastside Screens prohibition on logging large trees.

The use of Forest Plan amendments to allow logging of large trees and LOS (old growth) forest is an increasing trend of growing ecological impact significance across Eastern Oregon forests, as the number of such proposed Forest Plan amendments has been increasing over time and the number of acres over which large trees would be logged has been increasing as well. This is especially evident as a trend on the Malheur National Forest. However Blue Mountains Biodiversity Project/League of Wilderness Defenders stopped at least 7,000 large trees from being logged in the Snow Basin timber sale on the Wallowa-Whitman National Forest through successful litigation challenging this use of so-called "site-specific" Forest Plan amendments.

Logging large trees has significant negative impacts to wildlife and fish habitat, recreational and scenic values, attainment of Riparian Management Objectives, soil nutrient cycling, and, critically, to the storage and sequestration of carbon in larger live trees, snags, logs, and soils, which is vital to reducing the effects of extreme climate change.

As the Revised EA notes: "Forest Service staff have indicated witnessing visitor use well away from the campground in the forested stands around the developed site. It is evident that, based on the indicated visitor use patterns, Forest Service concerns related to public safety are within the whole Developed Recreation Management Area and extend beyond the developed campground and the access road into the surrounding forest." (Revised EA p. 54) The rest of the moist mixed conifer forest surrounding the Walton Lake Developed Recreation area and throughout the rest of the Ochoco National Forest also has scattered small root rot pockets similar to those within the Walton Lake area. Recreational visitors have used dispersed campsites in these areas and otherwise use moist mixed conifer forest for dispersed hunting, hiking, horseback riding, snowmobiling, ATV riding, wildlife and wildflower viewing and photography, and special events such as solar eclipse viewing. Felling of legitimate immediate hazard trees is considered sufficient by both the Forest Service and the public for providing safer conditions for the vast majority of recreational use on the Ochoco National Forest and other National Forests. This is also true for the vast majority of campgrounds and other developed recreation areas on the National Forests, including those on the Ochoco National Forest.

Two of the Forest Plan amendments are proposed because the project area boundary is the same as the Developed Recreation MA boundary and the management emphasis of maintaining a relatively natural outdoor setting applies to the entire area. The Revised EA clarifies that the MA includes the developed site and a visual influence area that surrounds each site. "The current visual quality objective for the Developed Recreation Management Area (MA-F13) and Forest Road 22 Visual Corridor (MA-F26) is "retention," which means that human activities should not be evident to the casual forest visitor. (LRMP 4-192 and glossary). The LRMP also states that timber activities will normally not be visually evident…." (Revised EA p. 28) The Revised EA goes on to admit: "The amendment [#3, Change in Visual Quality Objective] would change the visual quality objective in the units treated for laminated root rot to the Modification standard for approximately ten years." (Revised EA, p. 28) What a euphemism for an unsightly clearcut: "Modified."

There is a small type footnote on the Revise EA p. 13 that reveals the following, which formerly was buried in the project file and not disclosed in scoping or the prior EA: "Sanitation harvest is a

silvicultural term for a type of treatment for the purpose of stopping or reducing actual or anticipated spread of insects and disease. In this case it is considered regeneration [the Forest Service euphemism for clearcutting] that results in an even-aged stand, similar to a shelterwood, [a form of clearcutting] where overstory trees are left but there aren't enough immediately following harvest to consider it an uneven-aged stand and reforestation will occur." This definition identifying "Sanitation Harvest" as clearcutting still does not appear in the main body of the EA—at least not in Chapters 1 and 2, where alternatives and associated management actions are described.

In reality, the lasting extreme degradation to visual quality for recreation would last well beyond 10 to 15 years because the area would be transformed from relatively natural mature and old growth moist mixed conifer forest with a variety of tree species to a clearcut slowly regenerating with planted seedlings of only Ponderosa pine and Western larch. These would then become a maintained, even-aged plantation that would likely be planned for logging in the future. Plantations are much more sterile biologically and uninteresting visually than natural forest. Ponderosa pine plantations in clearcuts in the midst of moist mixed conifer forest are often sickly, readily subject to bark beetle infestations, and visually starkly out of place. This is my experience through field surveying in natural moist mixed conifer forest and finding artificially converted pine plantations planted on clearcuts there on the Umatilla and Malheur National Forests. The practice of converting natural moist mixed conifer forest to pine and larch plantations through clearcutting and replanting is grossly outdated. The Forest Service elsewhere is now focusing on diversifying even age sickly Ponderosa pine plantations in the midst of moist mixed conifer forests, such as with the Glass timber sale on the Umatilla National Forest.

The Forest Service proposed action is being used to justify Forest Plan amendments and defacto violations of the Forest Plan rather than the Forest Plan determining a more appropriate alternative for the Walton Lake area, which could include a real No Action alternative (back to the status quo before any timber sale planning for the Walton Lake Project took place) with continued immediate hazard tree identification and felling each year, or adding to that just the use of warning signs around the affected root rot areas, which are being used now (including the last few summers since 2015) to keep the campgrounds and other facilities open at Walton Lake, apparently with no overriding safety concerns—at our suggestion.

NFMA requires adherence to the Forest Plan or else revision of the entire Forest Plan for general changes such as changes in overall conditions (which could include increased wildfire concerns.) Root rot is forest-wide in moist mixed conifer and could affect dispersed recreationists across the Forest. NEPA requires the Forest Plan and other legal constraints to be recognized to drive development of a full range of alternatives, not for the Forest Service proposed action to limit the range of alternatives, as the narrowly defined purpose and need does in the Revised EA. The purpose and need statement is basically a description of the proposed alternative, just stated as the rationales behind the proposed action alternative.

The recitation of "Forest Health" MA standards and guidelines "that apply to the entire Developed Recreation MA" appears to be an attempt to distract from the Developed Recreation MA emphasis (priority) under the Forest Plan. If this emphasis did not override the Forest Service's proposed actions, the Forest Service would see no need to use Forest Plan amendments to override Management Area goals. The "Forest Health" standard or guideline (4-153) also reflects the Ochoco Forest Plan being outdated and no longer based on high quality science in its direction to "use all methods to prevent or

suppress insect and disease attacks", as high quality science now recognizes the need for such natural disturbances to be allowed to function to naturally thin the forest, create snags and logs for wildlife, and create habitat niches for a variety of species, as well as for creating the variable density with skips and gaps that the Forest Service seeks to emulate with commercial thinning. Full suppression of insects and disease is no longer seen as desirable for ecological functioning, and certainly not by "all methods".

The Revised EA, p. 5, quotes the "Harvesting Scheduling" standard or guideline (unspecified as to which applies) as: "Harvest only for the purpose of maintaining safe and attractive recreational sites. No scheduled timber harvest." Yet the Walton Lake sale rationale includes "addressing root rot" then proposes commercial logging that resembles clearcutting and would not maintain "attractive recreation sites". Commercial logging and removal of large fir trees in sale units 1 and 5 would also greatly degrade the attractiveness of the recreational setting. The "Reforestation" standard or guideline (4-213) states: "Rely primarily on natural regeneration", which the root rot clearcutting and re-planting would violate. "Harvest" standards and guidelines (4-213 and 4-215) limits "Regeneration Cuts" (i.e. clearcut openings) to 2-5 acres, which would clearly be violated with a 35 acre clearcut "Sanitation Harvest" in the root rot area. It's hardly trust-building for the Forest Service not to have revealed these Management Area restrictions in past scoping and the prior EA.

The Forest Service admits in the Revised EA that: "Outside of recreation special use areas, the Walton Lake project is subject to direction in the Screens [Eastside Screens] because implementation may involve some form of timber sales." (Revised EA p. 6) The recreation special use area in this case would be the developed site portion of the Developed Recreation Management Area under special use permit by the campground concessionaire (EA p. 6), yet logging large trees and old growth forest would still be completely contrary to maintaining a "relatively natural outdoor setting" and maintaining "attractive recreational sites" as required by Management Area standards and guidelines. As the Revised EA states on p. 6, "—the Eastside Screens are still in effect for timber sale planning on the Ochoco National Forest and contain guidelines for management of timber sales." This should lead to the Forest Service meeting the Eastside Screens requirements by not logging trees equal to or over 21" dbh and by not logging Late and Old Structure (old growth) habitat, rather than using bogus Forest Plan amendments to violate the Eastside Screens and the Forest Plan. NEPA requirements for full disclosure and in depth analysis of relevant issues and conflicts is intended to <u>prevent</u> violations of the Forest Plan and other applicable laws, not enable them.

<u>Public Involvement:</u>

The Ochoco Forest Restoration Collaborative is not reflective of the full spectrum of values held by the public at large, as suggested on p. 8 of the Revised EA. Most members of the collaborative representing environmental protection groups have long since left the collaborative group, including Blue Mountains Biodiversity Project. The group now is primarily composed of people supportive of (and often benefiting from) the extraction of natural resources from the National Forest and the economic returns from logging. This does not reflect regional and national public majorities who oppose commercial logging on National Forests. The Ochoco collaborative group is no longer working toward common ground with the full range of public interests though the collaborative group process original mission statements required working toward common ground among a full range of different public interests.

The Revised EA presents a very negatively biased portrayal of the No Action alternative : "The No Action alternative provides a display of trade-offs of allowing forest health issues to go untreated across

the entire Developed Recreation Management Area." (EA p. 10) This omits the role of immediate hazard tree assessment and felling every year for public safety regarding forest health issues and the continued use of root rot hazard tree warning signs. There is also the high likelihood that non-commercial size thinning and prescribed burning in the dry mixed conifer area would not be met with much opposition as a small project after the No Action alternative is chosen, as long as it is decoupled from a commercial timber sale and other management proposed currently, such as the public closure. Small tree thinning done by hand and prescribed burning only in the dry mixed conifer area should be enough to address any Forest Service anxiety about wildfire risk and tree competition, given that there is not really any excess density of mature and large trees. The Walton Lake area actually does not look like it is suffering from any significant forest health problem. Further, this negative portrayal of the No Action alternative omits all the positive outcomes of leaving the Walton Lake area the way it is, which is beautiful, as visitors currently enjoy it. The Walton Lake area currently does have a relatively natural outdoor setting and high quality scenic, recreational, and wildlife values that would be destroyed or greatly degraded by the proposed heavy and extensive commercial logging, "fuel" reduction, and "temporary" road building.

NEPA

<u>Alternatives or Project Design Not Analyzed in Detail by the Forest Service:</u>

Alternatives were proposed by the public that were precluded by the Forest Service from detailed analysis due to assumptions based on an overly narrow purpose and need for the project that predetermines both the intensity and extent of logging. The failure of the Revised EA to disclose and consider the high quality science presented by Chad Hanson, Ph. D. in comments submitted during earlier comment periods on the Walton Lake sale and referenced in Blue Mountains Biodiversity Project comments (confirming that logging is known to spread root rot) enables the Forest Service to preclude other more logical and reasonable alternatives for addressing the root rot issue.

The first alternative listed that was rejected for in-depth analysis (logging smaller patches of root disease areas), rather than being rejected because logging is known to spread root rot, is rejected on the narrow basis that "this would leave infested untreated areas between group openings [mini clearcuts] and this does not follow recommended management guidelines to curb impacts of the disease." (Revised EA p. 30) These "recommended management guidelines" adopted by the Forest Service are the only approach the Forest Service is considering valid for the proposed action and so the rejection of this alternative for detailed analysis is thus predetermined by the proposed action.

The second public alternative listed that was denied in-depth analysis is to survey and remove root disease trees annually. The rationale for rejecting the reasonable normal practice of identifying and felling immediate hazard trees (as is already done at Walton Lake every year) is here rejected due to lack of economic value for the timber industry, which is possibly the real driving motivation behind this sale: "this approach would extend the amount of time to reestablish a new healthy stand of rot-resistant species; falling a few trees each year would not provide the ability to economically remove the trees for salvage or timber value and they would become fuel on the forest floor…." (Revised EA p. 30) This means that the Forest Service is precluding public alternatives as unreasonable if they "extend the amount of time" to convert the moist mixed conifer mature and old growth stand artificially to "rot resistant" species through clearcutting and replanting (the proposed action) and if the alternative would not "economically remove the trees for salvage or timber value", which is not stated as a primary

purpose for this sale, and if the alternative allows the felled trees to become "fuel" on the forest floor. The Forest Service could not have invented a more arbitrarily narrow purpose and need to preclude all other alternatives if they tried. Yet this rationale for precluding the alternative is not actually based on the stated purpose and need for the sale but on the management parameters of the proposed action. Further, mature, large, and old growth logs on the forest floor are not just "fuel" but important components of wildlife habitat and sinks for carbon storage and sequestration, as well as crucial for soil nutrient cycling and recreational aesthetics. Large logs are at a deficit compared to historic conditions across the Walton Lake area due to past logging.

Similarly, the Forest Service rejection of the fourth public alternative listed (using small diameter thinning less than 21" dbh, which could actually be commercial thinning of fully mature trees throughout the project area or in the different vegetation types/treatment areas) states that: "Removal of all grand fir and Douglas fir (including greater than 21" dbh) in Units 2, 3, and 4 is needed to control laminated root rot in manner [sic] that is consistent with the purpose and need for the project and high quality science." (Revised EA p. 30) This would limit viable action alternatives to those that include clearcutting, including of large and old trees, in units 2, 3, and 4 and replanting with "root rot resistant" tree species, namely timber industry preferred Ponderosa pine and Western larch—in other words only the proposed action would be considered a viable alternative. Ironically, this would exclude Forest Service offered action alternatives 3 and 4 from detailed analysis and consideration, even though these are presented as viable action alternatives in the Revised EA. This reveals that alternatives 3 and 4 have already been rejected out of hand, judging by the Forest Service response to this public offered alternative. Again, the Forest Service is predetermining the outcome rather than seriously considering the full range of high quality science and reasonable alternatives suggested by the public.

From our point of view, the Forest Service then actually seems to make the case for merely continuing to conduct annual immediate hazard tree assessments instead of "addressing overall forest health." The last listed alternative precluded from in-depth analysis, even though it has worked so far, for decades, is described as follows: "Some commenters suggested that the Forest Service already has the means of addressing forest health issues, including root disease issues, with existing hazard tree guidance. Routine maintenance of recreation sites includes annual assessment and felling of hazard trees. The Forest Service conducts annual hazard tree inspections in the campground and day use site at Walton Lake. This allows the Forest Service to address *identifiable* hazards each year….Hazard tree policy is intended to allow the identification and removal of immediate hazards in these areas but does not provide a tool for addressing more extensive forest health issues such as bark beetle risk from competition or diffuse root diseases. Annual hazard tree identification and falling would occur under any of the alternatives…." (Revised EA p. 31) Sounds good to us. Hazard tree policy does not address bark beetle infestations and diffuse root diseases because it's impossible to fully stop them and not ecologically desirable to do so. These are the forest's natural methods of self-thinning, creating variable density openings and patchy density, and providing habitat niches for all the species that evolved with natural disturbances (but not with logging and tree plantations.) Clearcutting and replanting with inappropriate tree species for the site characteristics is repeating past mistakes, not a brilliant solution. Further, trying to eliminate potential hazard trees before they actually present an immediate hazard can be used as a rationale to cut down the whole forest, or in this case, clearcut and convert moist mixed conifer forest into a Ponderosa pine/Western larch timber sale plantation and log additional mature and large trees in one of the most popular relatively natural recreation areas on the Ochoco National Forest.

NFMA, wildlife viability

Concerns regarding negative impacts to wildlife diversity in the Walton Lake project area:

Wildlife species evolved with these natural disturbances and are dependent on them for habitat niche creation. Examples of this are woodpecker species moving in to bark beetle infested areas to forage and find snags for nesting. It's critical to recognize that woodpeckers and other birds are the main predators keeping insect epidemics in check, so it is very important to make sure that sufficient evolving habitat from disturbances is available to them to ensure their population viability. Woodpeckers in the Walton Lake project area include Pileated woodpeckers and Northern Flickers, who also require large trees, and in the case of Pileated woodpeckers, decaying fir snags and logs, especially Grand fir. Root rot areas become productive foraging grounds for Pileated woodpeckers and Black bears. Fallen logs provide denning hollows for species like woodrats and other small mammals, which provide prey for American marten. Large fir snags provide denning cavities for Sensitive-listed Pacific fisher or nesting platforms for Great Grey owls, who prefer broken topped large old growth Grand fir. Yet the proposed action and the two other action alternatives would eliminate habitat for all of these species and many more due to proposed clearcutting, conversion of mature and old growth moist mixed conifer forest to Ponderosa pine/Western larch seedlings and future even-aged plantation, and logging removal of large fir trees.

We are also concerned by potential negative effects through removal of hiding cover for deer, elk, and wild horses coming to the lake to drink and the need for a buffered natural setting for a great variety of songbirds and water birds, as well as muskrat, aquatic garter snakes, and other aquatic and riparian species associated with Walton Lake.

Walton Lake is currently a natural outdoor setting with natural disturbances, biodiversity, and flourishing ecological relationships and should not be converted to a clearcut that would become a long-term sterile plantation, and to existing mature and old growth forest with stumps instead of existing large live firs.

Comments on Chapter 3—Environmental Consequences of the Revised Environmental Assessment for the Walton Lake "Restoration" Project

Soils analysis section:

We are very concerned that the lack of structural development of the deep ash soils throughout the project area "makes them susceptible to erosion when erosion water is channeled on compacted soil surfaces such as skid roads, water bar outlets, or road drainage structures and directed as overland flow." (See Revised EA p. 120 with reference to Ash Soil Guidelines for OR/WA 1985.)

It is not clear that existing detrimental soil disturbance in the proposed sale units has been added to the detrimental soil compaction percentage of each sale unit that would be affected in Table 25. On page 120 the analysis acknowledges that "all proposed treatment blocks are estimated to have less than 5% existing detrimental disturbance." Yet the percentage of existing detrimental soil disturbance is not specified for each sale unit.

We are especially concerned by the much higher potential for detrimental soil impacts from logging skid trails, landings, and "temporary" roads in sale units 1, 2, 3, and 4. (See Table 25, Revised EA p. 121.)

The 16 to 17% detrimental soil compaction figures for these sale units are based on the assumption that all project design criteria (PDCs) and Best Management Practices (BMPs) are applied and are 100% successful. PDCs and BMPs are not always applied as planned and are not always completely effective. For instance, consider the following from the soil effects analysis on Revised EA pages 121-122:

"Temporary roads created in Units 1 thru (sic) 4 would be compacted to detrimental levels from haul traffic and would contribute to this total unless surfaces were tilled to alleviate these conditions….Tillage is recommended where soil depths are appropriate and funds are available." This means that soil tillage (subsoiling) may not occur if funding is not available. Other PDCs may also not be implemented if funding is not available or if a contractor neglects to implement a project design criteria or follow a Best Management Practice.

The percentage of soil compaction per sale unit estimates in Table 25 also do not take into account all the soil disturbance between (or outside of) skid trails, landings, and "temporary" roads. This is recognized on Revised EA p. 122: "Additional compaction of the soil is likely to occur within treatment units 1 thru (sic) 5 from off trail traffic of machine harvesting equipment used to cut and bunch commercial material onto skid trails throughout the units….An increase in detrimental compaction of less than 5% of the unit area could be incurred from this activity." Yet an increase of only 4% detrimental soil compaction would be enough to cause sale units 2, 3, and 4 to exceed the Forest Plan standard for detrimental soil impacts, and a 5% increase would be enough to cause sale unit 1 to exceed the Forest Plan standard, based on Table 25.

The soil analysis also identifies another additional source of detrimental soil disturbance:

"Impacts from feller bunchers to cut and bunch material would also occur from within the designated safety corridor along road 2220. Treatments along road 2220 would be localized but would result in areas of detrimental soil disturbance due to the physical number of trees to be processed and the logistics of cutting and accumulating material at the base of a slope within this corridor….As a result, additional amounts of detrimental soil disturbance from off trail traffic of feller bunchers are estimated to be less than 2% of Treatment Units 2, 3, and 4 from harvesting and accumulating operations off skid trails and outside the RHCA boundaries." (Revised EA p. 122)

This is apparently another up to "less than 2%" estimated additional increase in detrimental soil impacts above the percentages of detrimental soil compaction by sale unit in Table 25. These additional amounts of predicted detrimental soil disturbance add up to potentially exceed the Forest Plan standard of allowing for no more than 20% of an area to have detrimental soil impacts.

The methodology behind assumptions that off trail detrimental soil disturbance would be "less than 5%" from off trail traffic of machine harvesting equipment used to cut and bunch material onto skid trails and "less than 2%" for apparently additional impacts from off trail feller bunchers along road 2220 is not disclosed. Nor is the exact percentage of these additional off trail detrimental soil impacts for each sale unit calculated. Instead these seem to be rough estimates which could be exceeded. Even if the combined additional soil disturbance is only 5% for sale units 2, 3, and 4, this is enough additional soil disturbance to violate the Forest Plan standard.

Detrimental soil disturbance would be especially severe in sale units 2, 3, and 4 where clearcutting (aka "regeneration…like a shelterwood") is planned to remove all firs, which are the vast majority of the

trees for that area. It is very unlikely that detrimental soil impacts would be limited to 17% of the sale unit areas, given the very heavy logging and associated log and slash removal planned.

Compaction is not the only detrimental soil impact that would be caused. The high level of compaction in all of the commercial sale units (including unit 5) of combined .4 acre to 1.3 acres of skid trails for each sale unit, 1 to 3 acres of landings for each sale unit, plus .1 to .3 acres of "temporary" road compaction per sale unit for units 1, 2, 3, and 4 would just be the starting point for further detrimental soil impacts of erosion and sediment travel when water is channeled on these compacted surfaces. Displacement of easily displaced ash soil would first displace the organic top horizon layer (Horizon A), which is also not taken into account throughout the sale units in Table 25. All of these detrimental soil impacts not accounted for in Table 25 combined means that detrimental soil impacts are likely to exceed the Forest Plan standard for detrimental soil impacts. It's noteworthy that no assurance is given in the soil effects analysis that Forest Plan standards for detrimental soil impacts will not be exceeded.

The soil effects analysis clarifies that detrimental soil impacts are not limited to compaction (which is the only form of detrimental soil impact in Table 25):

"Direct effects to the soil resource as a result of proposed ground-based mechanical harvest and yarding activities would include detrimental disturbance of mineral soil in the form of compaction, displacement or puddling. Indirect effects could include erosion losses from disturbed sites as a result of mechanical traffic and compaction." (Revised EA p. 121, 1st par. under "Alternative 2")

Grapple pile burning on skid trails is not a "negligible" effect, as burning of grapple piles often burns intensely, reducing the area to bare, sterilized mineral soils that would be very slow to recover from loss of the organic soil horizon (Horizon A).

INFISH Buffer violations:

There should be no trees over 12" dbh removed from RHCAs (we support only small conifer thinning up to 9"dbh) and these should not be removed with heavy equipment, but by hand only. We are opposed to any feller buncher or heavy equipment use within the RHCAs. What does "minimal and localized" mean in actual practice? INFISH standards are not being met if the "No Logging" buffers would be violated. Class 3 stream channels should have at least a 100 foot buffer, not 50 feet, and Class 4 stream channels should have at least 50 foot buffers, not only 25 feet. (See Revised EA p. 122, 3rd full paragraph.)

We are concerned that soil productivity would not be maintained "over 80% or more of each unit." (Revised EA p. 122) As described above, detrimental soil impacts would not just be limited to "harvest system infrastructure" (i.e. skid trails, landings, and "temporary" roads.) The soil effects analysis acknowledges the following effects to soil productivity from soil compaction alone (not including displacement and loss of the top organic soil horizon layer):

"Detrimental compaction of mineral soil reduces porosity, decreases infiltration rates and can result in less water, air and nutrient availability to vegetative roots within the soil profile. Increased bulk density can also affect tree root growth and mycorrhizal symbiosis with roots by increasing mechanical resistance within the mineral soil profile." (Revised EA p. 122, 3rd to last paragraph)

The soil effects analysis also raises concerns regarding detrimental displacement of soils directly causing loss of soil productivity:

"*Detrimental Displacement:* Described as the removal of greater than 50% of the A horizon material over an area greater than 100 square feet. Side hill traffic by harvest or skidding machinery under very dry conditions, multiple turns over the same piece of ground, or temporary road construction have the potential to displace the mineral A horizon over a large enough area to meet this criteria in Blocks 1 and 3. Displaced soils can have reduced productivity due to the loss of A horizon material and are often channelized and loosened so that they are more susceptible to erosion." (Revised EA p. 123, with one corrected word: "than" was changed to "that" in the last sentence.)

We are concerned that detrimental soil displacement could take place in Blocks 1 and 3 (sale units 1, 2, 3, 4, and 5.) We are also concerned that displaced soils can have reduced productivity not favorable to forest health or biodiversity. Displaced soils are often channelized and loosened so that they are more susceptible to erosion. The soil effects analysis warns of the following foreseeable soil displacement and loss of the organic top soil:

"Areas designated for commercial machine thinning within treatment units 1 thru (sic) 5 will have machine traffic from feller bunchers and skidders capable of displacing surface soil from side hill travel or maneuvers to or along skid trails. Slopes within these units are variable but combine with deeper ash soils to be conducive to this process….Displacement of soil will occur to create approximately 1,400 feet of temporary roads to access landings in treatment units 3 and 4. These temporary roads would contour along 20 to 25% slopes where the uphill side of the road bed would be gouged enough to displace the A horizon." (Revised EA p. 123, the first two bullet points)

There is no guarantee that such displacement of soil would be limited to less than 100 square feet, especially not when uphill slopes of 20-25% are being "gouged enough to displace the A horizon." PDCs may be designed with the intention of mitigating these impacts but there is no guarantee that they will be effective in doing so.

Further, the soil effects analysis identifies potential for erosion impacts to soil:

"*Erosion:* …. The proposed activities could indirectly cause erosion to occur as the result of compaction, displacement and/or exposure of mineral soil to wind and overland flow during rain storms. The removal or mixing of surface organics with mineral soil could also make areas of the soil resource susceptible to erosion." (Revised EA p. 123)

The effects of potential erosion are also not taken into account in Table 25.

The soil effects analysis also raises the potential impact of reduced infiltration and sediment transport off site:

"Reduced infiltration can indirectly affect the soil resource by increasing overland flow energies and volumes during rain fall events to levels capable of detaching mineral soil and transporting it off site. Skid trails located on slopes are the most susceptible areas for this to occur following the proposed activities." (Revised EA p. 122, 2nd to last paragraph)

We remain concerned after reading the analysis that reduced infiltration of water into the soil will increase overland flow energy and volume during rain fall to levels capable of detaching mineral soil and

transporting it off site into streams, wetlands, and ultimately the lake. Feller buncher impacts to RHCAs are alluded to in the analysis. Logging adjacent to RHCAs would be very heavy with lots of detrimental compaction surfaces for overland flow in units 2, 3, and 4. There would be excessive soil disturbance and removal of stabilizing trees in these sale units which would resemble a highly disturbed clearcut after logging. The RHCA buffers are identified as being less than INFISH requires for Class 3 and 4 stream channels. INFISH buffers are based on solid science. We are concerned by potential impacts to fish and other aquatic organisms in the streams and the lake due to excess fine sediment loading. Rainfall also now tends to be more intense and heavier when it occurs due to climate change, increasing the potential for overland flows. There would be little plant cover left to slow these flows—especially in sale units 2, 3, and 4. Plant cover would also be reduced in sale units 1 and 5.

Inadequate Cumulative Effects analysis:

The soil analysis does not lead to the conclusion that proposed activities would not increase soil disturbance above Forest Plan thresholds for maintaining soil productivity in units 1 through 5 and thus does not justify the conclusion that there would be no cumulative effects to soils within the sale units. The existence of cumulative effects to soils are also not dependent on exceeding thresholds for soil productivity due to the proposed management actions. This is an evasion to avoid doing cumulative effects analysis for soils in the project area. Cumulative effects from past logging, hazard tree removal, and past road construction in the sale units (which are still evident, based on our field surveying and Revised EA mention of this evidence) are thus not being considered in combination with planned logging, road building, and other impacts of proposed management actions. (See Revised EA p. 124 under "Cumulative effects".)

The general "Cumulative Actions" section is a joke. It is not adequate cumulative effects analysis under NEPA as it is merely a listing of past management actions in the area with no detailed analysis of their combined cumulative effects on specific resources or values in the Walton Lake area. For instance, adjacent Canyon timber sale logging detracted from scenic and recreational values on the east side of the lake, and now the Walton lake project proposed logging on the south, southeast, and west sides of the lake would further degrade the recreational and scenic values that the Management Area designation for Developed Recreation was designed to protect. This means that now the relatively natural outdoor setting, scenic quality, and recreational setting aesthetics all around the lake would be compromised. (See Revised EA pages 32 and 33.)

Geology effects analysis section:

The geology effects analysis bolsters our concerns about the high potential for detrimental soil impacts from the proposed timber sale:

"The entire planning area is underlain by dormant landslide terrain. When there is a change in the ground water flow through the unstable terrain on slopes >20%, the potential is increased for slope movement. Rapid shallow debris flows and deeper rotational slides can result, altering the vegetation potential and possibly releasing sediment into the stream systems, depending on proximity to the riparian areas."

"For all the units in the action alternative, primary concern from a mass wasting standpoint is for those units on dormant landslide terrain. Mapped landslide debris underlies all the commercial units and

other proposed activities for 175 acres. Landslide terrain tends to develop unusual subsurface drainage patterns. The intensity and style of management activity on landslide terrain, in the vicinity of seeps and springs, could potentially change the drainage pattern, possibly increasing the risk for instability."

"The more intensive treatments in units 2, 3, and 4 have the potential to reduce the evapotranspiration which leaves more groundwater in the slope." (all excerpts from Revised EA geology effects analysis on p. 133)

Forested Vegetation effects analysis section:

As the Forest Service points out on the Revised EA p. 33, the majority of the surrounding tree species' seed source in the moist mixed conifer area is from fir species. What they don't mention is that this seed source is already in the soil and would likely remain in the soil after all the clearcutting and replanting, providing for laminated root disease host tree species to grow back into the area.

Even the drier mixed conifer sale units are admitted to be not that dry—instead they are Grand fir plant associations and have old growth of various species, including Douglas fir and Grand fir. There are also old large fir stumps in sale unit 1 from past logging. The stands in sale units 1 and 5 were already noncommercially thinned only 10 years ago (Revised EA p. 33) and really don't look unnaturally dense. Sale unit 1 also has a lot of evidence of past hazard tree removal, as noted in the Revised EA, p. 33. The perceived "need" for commercial thinning and even for non-commercial small tree thinning in sale units 1 and 5 is dubious at best.

Obviously 50 trees >/= 21" dbh do not have to be removed over the two commercial thinning sale units (1 and 5) for density reduction when commercial thinning is estimated to remove 1,770 trees. Removing so many mature and large trees would have a major negative impact to visual quality, recreational aesthetics (which include highly valuing large trees and not wanting to recreate in logging sites), wildlife habitat, and existing carbon storage and sequestration in the area to reduce climate change effects. Sale units 1 and 5 would no longer have the high visual retention quality, scenic value, or the appearance of a "relatively natural outdoor setting", all of which are required by the Developed Recreation Management Area standards and guidelines. 1,770 is an astoundingly high number of trees to remove from only 43 acres; this would not look like just a "commercial thin" at all. The sites would be wide open and look completely altered, with no natural forest appeal or sense of place for those visitors who had seen the areas before the logging. Sense of place is also a landscape character value that the Management Area designation seeks to preserve. Density is already variable across sale units 1 and 5, which both have both small and large openings. We are opposed to the proposed "commercial thinning" in sale units 1 and 5 as unnecessary and ecologically and recreationally destructive. We are not opposed to small tree thinning by hand only up to 8 to 9 " dbh around the old growth Ponderosa pine and Western larch although we also don't see much need for it.

We are strongly opposed to any density reduction targeting late seral mature and large Grand fir and Douglas fir. The Walton Lake sale proposed action would remove 521 fir trees larger than or equal to 21" dbh from sale units 2, 3, and 4. This is a huge and shocking planned elimination of large and old growth firs from such a small area as 35 acres. This high abundance of large and old growth fir points to the significance of this area for wildlife and recreational enjoyment. No wonder the Forest Service doesn't want the public to violate the closure and see the marking to cut on so many large and old growth firs. This also confirms our suspicions that this is indeed an old growth/large tree timber grab

that would be very lucrative for the timber industry. Such an old growth timber sale would be highly unlikely to take place without all the misleading information and omissions regarding what is really being planned to the public and hiding of what would take place on the ground behind a public closure with hefty fines for its violation.

This is outrageous—a total of about 571 large (including many old growth) trees would be eliminated from a very popular recreation area. Old growth associated wildlife are using the moist mixed conifer habitat in these sale units, including Pileated woodpecker, Northern Flicker, and possible marten. The retention of large trees is more important than ever for preserving carbon storage and sequestration in the face of extreme climate change, the biggest global crisis of our time. Yet all these values and conflicting Forest Plan standards, guidelines, and goals are just being tossed aside in order to increase timber sale volume and enable an old growth/large tree timber sale grab for industry profit. Only about one in six large trees would be retained overall, with a biodiversity reduction through eliminating all the fir and huge canopy gaps where all or most of the mature and large trees were fir. Apparently all the snags would be removed, as well as most logs, so habitat for old growth, large tree, and density-associated wild life species would be eliminated throughout the 35 acres. The EA figures showing visual representations based on models of what the sale units would look like understate the devastation, both by still showing standing snags and by failing to show the big gaps with no trees left.

Based on our field surveying and the Figures # 10-13 on Revised EA pages 37-38, planned commercial thinning with or without removal of large trees would have a disastrous effect on the existing relatively natural outdoor setting for recreation, converting it to a logging site in appearance. The effects of very heavy intensive logging in sale units 2, 3, and 4 would make that area unrecognizable from the green mature and old growth fir dominant forest with small openings that it is today. The setting of this area is currently appealing from the loop road and from within the stands, except, notably, for a few logged areas from the past that removed all or most of the large trees. We experienced great delight in finding so many old growth firs and some very large old growth firs up to about 67" dbh within the stands in sale units 2, 3, and 4. We have photographs of many of these large old growth firs that would be destroyed.

These old growth firs are legacy trees that the Forest Service would ordinarily be honest enough to call that and protect them from logging—or so we thought. Being in the presence of these big old growth firs is just as special as being near legacy old growth Ponderosa pines and Western larch or any other big old growth tree. There is a peace, longevity, and artistry about them that is irreplaceable and key to the recreational value of the Walton Lake area. If the old growth and large trees are cut down and/or the clearcut of the proposed action or alternative 3 is implemented, I would never want to come back to the Walton Lake area for recreation. It would be far too painful and sad. The sense of place would be gone. The vast majority of people seeking natural outdoor settings for recreation like Walton Lake do not want such areas logged at all, let alone clearcut or large trees removed. If current logging plans go forward, recreational use of Walton Lake can be expected to plummet. Most of the recreationists who regularly visit Walton Lake for birding, hiking, cross country skiing, family gatherings, or relaxing might never come again, as the enjoyment would be gone. Most newcomers would not return.

Why are the required LOS numbers of large trees per acre set so high compared to other Forests? For the Malheur National Forest, stands are considered LOS if they have 10 large trees per acre. This policy of 15 to 20 large trees per acre being required leaves stands with fewer large trees per acre out of

consideration in analysis and for future or current old growth development. This encourages more large tree structure to be logged despite the large regional deficit in large trees due to past overlogging and current continued incremental reductions, as proposed in the Walton Lake sale and unfortunately executed in the Wolf sale on the Ochoco.

A "root disease climax community" is a natural potential (but not inevitable) successional state, not a terrible or unnatural situation. The Forest Service is planning to bring about a worse condition in sale units 2, 3, and 4 by unnaturally clearcutting and artificially replanting only timber industry preferred tree species. This would end up being a much more open scene of devastation with even fewer and more scattered large trees and far less biodiversity than what could result from the climax community.

In the moist mixed conifer old growth area large and old growth trees would be reduced from more than 20 per acre to only 3 per acre, all snags would be felled, and most logs would be removed, so the entire 35 acres of LOS (and old growth) would be eliminated. Alternative 3 would replicate the same devastation, just on a smaller scale.

Inadequate Cumulative effects analysis:

Compared to historic (pre-European) conditions, the headwaters Ochoco Creek watershed definitely does have a deficit of LOS, as much of the area (including the Canyon sale area, which we field surveyed) has been converted into even-age younger-mature Ponderosa pine plantations. We are referring to that deficit in large trees, the historical obvious deficit from past extensive logging of large trees and old growth forest, not modeling of theoretical HRV for different forest types of LOS. The Walton Lake logging under alternatives 2 and 3 would definitely contribute negative impacts to the overall loss of large tree structure and old growth forest on the District, the Ochoco National Forest, and the region.

The time frame for cumulative effects to LOS on the Forest scale starting at 1995 (when the Eastside Screens went into effect) is very convenient for failing to disclose all the prior timber sales on the Forest that eliminated large trees (LOS) and old growth through logging. This is very biased analysis apparently designed to make cumulative effects to large trees and old growth on the Forest magically disappear.

Considering that only one other timber sale removed large trees greater than or equal to 21" dbh (since 1995, through Forest Plan amendment, over our protests), at 384-768 large trees removed (shouldn't the Forest Service know how many?) , the additional removal of 571 large trees through the Walton Lake timber grab is a significant increase in the loss of large tree structure. This is especially true considering the small acreage involved at Walton Lake, which intensifies the effects of the loss for scenic and recreational values in the relatively secluded lake area.

Fuels effects analysis section:

Figures 16-19, photos portraying current down wood in sale unit 3, look good and healthy for wildlife habitat and soil nutrient cycling, not like excessive down wood (aka "fuels"). These are also patchy "pockets" of blow down shown, not continuous stretches of heavy down wood being consistent across the stands. I don't remember excessive down wood in these stands; they were easy to walk through, with variable density and variable down wood levels.

Figures 17, 18, and 19 show what looks like good marten winter foraging conditions, which means these areas are also good small mammal habitat, which are prey species for many predators, including

marten, coyotes, bobcats, owls, Northern goshawks and Coopers hawks, and any dispersing Canada lynx or Grey wolves. Down wood is not just "fuel". Wildlife species of many kinds need large logs, and some species need abundant down logs. Down logs are also crucial for soil nutrient cycling and carbon storage and sequestration, as well as for a great diversity of micro-fauna necessary to the functioning of the ecosystem.

The "relatively natural outdoor setting" desired for the Recreational Management Area is not natural without down logs and at least some snags. This is ridiculous tunnel vision to reduce down wood to only "fuel" considerations. Large logs also store moisture and are less likely to burn.

The biggest fire risk around Walton Lake is likely the still un-burned piles of slash from the adjacent Canyon timber sale. If the Forest Service is really that concerned about fire risk, why haven't these many dry slash piles been removed before yet another fire season? Why not deal with that instead of pretending that the Walton Lake area (which is much moister than the surrounding heavily logged area) really needs much, if any "fuel treatment". Non-commercial thinning by hand of only small trees up to 8-9" dbh and prescribed burning only in the drier mixed conifer should be sufficient to reduce fire risk and tree competition in the Walton Lake project area. This is especially true since the dry mixed conifer was just non-commercially thinned only 10 years ago, and since mature and large hazard trees have been systematically removed from the area in addition to the removal of mature and large trees from the area from past logging, which can be seen in parts of the block encompassing sale units 2, 3, and 4 as well as in the drier mixed conifer sale units 1 and 5. There is no excess density of fully mature and large trees in the Walton Lake area, based on our field surveying.

As the Forest Service should know, decreasing canopy cover, or crown bulk density, is the <u>least</u> effective way to reduce wildfire risk. A lot of mature and large tree crowns have already been removed from the Walton Lake area through repeated hazard tree removal and past logging.

The Canyon Fuels and Vegetation Management Project (2010) reduction of "fuels" and moderation of the risk of wild fire entering the Walton Lake Developed Recreation Area from the outside should be weighed against the perceived need to substantially reduce down wood and live trees in the Walton Lake area. A lot of the work has already been done—without completely destroying the recreational and scenic quality of Walton Lake, which the proposed new timber sale would do. Yet all the "fuel" reduction all around Walton Lake is now not considered enough, even though a lot of it was planned to help reduce fire risk to the Walton Lake area. We negotiated the Canyon timber sale in good faith with Ochoco staff, yet now there does not seem to be any good faith on the part of the Forest Service with the way the Walton Lake sale was planned and presented in such a misleading way to the public. There's still time to reverse course and save the natural character and recreational appeal of Walton Lake—without destroying it.

<u>Recreation effects analysis section:</u>

The analysis states the following: "The forested vegetation and understory are key components of the recreational experience at Walton Lake. Large old trees, often referred to as legacy trees, are particularly important to the character of the site." (Revised EA p. 54) Then why is the Forest Service planning to remove so many large and old trees, or any large trees at all? People value large trees, not just old trees, as do wildlife. Large trees are also more valuable than small trees for carbon storage and sequestration to slow climate change, for soil nutrient cycling, for wildlife habitat niches for many

species, for good riparian conditions for fish, and for recreational and scenic values. Logging large and old trees is in direct contradiction to this analysis admission of their importance to the recreational experience and the character of the Walton lake recreational site. Logging large and old trees is in complete conflict with Forest Plan goals to protect and increase them and with management area direction for the Walton Lake recreational site.

Likewise turning the relatively natural outdoor setting and natural character of the Walton Lake area into a logging site (which would be very obvious across the entire area) is completely antithetical to the recreational values of the area and to the management direction for the site. It is clear that even if no large trees were logged, the intensive and extensive logging impacts of the proposed timber sale would greatly degrade the character and recreational values of the Walton lake area. Planned clearcutting and logging of large trees would completely destroy these values and ensure that hardly anyone would want to go there for recreation, defeating the purpose of the Developed Recreation area management designation. Why sacrifice long-term benefits (including yearly economic income) from a very popular recreation site with lots of recreational use for a one time gift to the timber industry, which would entail irrevocable destruction of existing natural and recreational values?

Destroying the Walton Lake area by logging it is also completely unnecessary:

"Developed recreation areas demand the highest degree of public safety. To ensure this level of public safety, the Forest Service has a policy to mitigate hazard trees in these sites on an annual basis prior to them opening. The Ochoco National Forest has been felling hazard trees annually at Walton Lake for many years….Approximately 10-20 hazard trees that range between 10" and 40" DBH are felled each year in the developed site area." So? What's wrong with that as the method of ensuring public safety? No one is trying to stop the Forest Service from felling legitimate immediate hazard trees. The greater public and recreational visitors to Walton Lake are not clamoring for it to be logged, nor for it to be clearcut or have the large and old fir trees removed. The public generally accepts hazard tree felling as a sufficient way to ensure public safety in recreational areas and across the rest of the Forest.

Obviously hazard tree felling alone is sufficient for public safety or the campgrounds and Walton lake facilities in general would not have been kept open over the past few summers with only hazard tree felling to ensure safety. The Forest Service added root rot falling tree hazard signs, at our suggestion. However our suggestion was to substitute warning signs for the timber sale and to prevent any perceived need to close down the Walton Lake area to public access. We oppose the unnecessary public closure and the associated draconian fines. These are now being used as a form of black mail to force the acceptance of the proposed action.

The public closure does seem to be much more about ensuring that the public does not see the marking to cut of the already laid out and marked clearcut timber sale within the closure than it is about public safety. Recreationists would certainly not enjoy seeing the marking to cut of at least 521 large trees, which are likely mostly old growth trees, within the closure area, unless they happen to be timber industry workers standing to benefit from the logging economically. Recreational visitors are far more likely to be killed in a traffic accident on their way to or from Walton Lake than to be seriously injured or killed by a falling tree, and they know that. The Forest Service must know that too. People know they are taking risks when they enter a natural forest and they choose to go there anyway. With such existing intensive hazard tree felling, the Walton Lake area is already a lot safer for the public than

most of the rest of the Ochoco National Forest. The Forest Service must know that too. A completely safe forest would no longer be a natural forest or a relatively natural recreational forest setting.

The recreational effects analysis acknowledges that the closure would continue under the No Action alternative but fails to disclose the already marked timber sale units within the closure and the large fines associated with violating the closure. This failure to disclose relevant existing conditions does not seem accidental.

It is simply not true that the No Action alternative would not meet the objectives of the Forest Plan; in fact it has long been meeting the objectives of the Forest Plan and continues to be meeting them better than any of the three logging alternatives would. It is also not true that the No Action alternative would not meet the objectives of the Forest Plan "because no steps would be taken to address the continuing hazard of diseased trees in the greater Developed Recreation Management Area" as this ignores the yearly successful hazard tree felling. Clearcutting and large and mature tree removal is also not needed in order to address "the increase of bark beetles and wildfire risk" that is the perpetual Forest Service justification used for virtually every current and recent timber sale, often, as in this case, with little regard to actual conditions. There are other ways to address the density and "fuels" associated with bark beetles and wildfire risk at Walton Lake, assuming for a moment that it is actually a real problem. First, there's already been a lot of "fuel" reduction and commercial thinning all around the lake. The Developed Recreation area is also surrounded by relatively wide paved roads which serve as fuel breaks. Since there is no real excess density of mature and large trees, we are suggesting that non-commercial small tree thinning by hand and prescribed burning just in the drier mixed conifer forest should be sufficient or to just leave the area alone, as would be the case with a true No Action alternative.

Here's the blackmail being used by the Forest Service to force acceptance of the proposed action in the description of effects of alternative 2:

"There would be a long-term benefit to camping and recreation in the project area because the closure of 35 acres would be lifted and potential for delayed openings, emergency closures or potential full expanded closure area due to hazard trees would be minimized by controlling the LRR infestation. Several campgrounds and parks in the Pacific Northwest have had to close due to hazards related to LRR infestation." (Revised EA, p. 58)

The Forest Service could lift the public closure right now. There is no legal requirement or real necessity for a public closure. The warning signs posted warn of the hazard. Most people will never notice the ominous hefty fines for closure violation since they are in miniscule print at the bottom of the sign about the Walton Lake project and the root rot situation. This means that people are going into the closure area anyway. We have seen recreationists enter and exit the closure to use the Round Mountain hiking trail segment.

Attaching the closure to the No Action alternative nullifies it being a legitimate No Action alternative. Attaching the closure to all the action alternatives means that there is an inadequate range of alternatives as none avoid the closure. There is absolutely no guarantee, and not even much likelihood, that the proposed virtual clearcutting and conversion of the clearcut into a Ponderosa pine/Western larch seedling plantation would "control" the Laminated Root rot infestation at all. See our arguments regarding this in other sections of these comments.

With regard to the implied threat that "(s)everal campgrounds and parks in the Pacific Northwest have had to close due to hazards related to LRR infestation" (Revised EA p. 58), there can't be many of these compared to the great number of campgrounds and parks that have not done this. I haven't heard of any campgrounds or parks in the Pacific Northwest closed due to Laminated Root Rot. On the Malheur National Forest, the large Armillaria root rot infestation area is now advertised as a tourist attraction and recreationists and scientists go there to see it, with no public closure.

Theoretical long-term benefits can not be used to justify or offset very foreseeable potential immediate and short-term impacts, such as the Developed Recreation site being so altered and ugly from logging that recreational visitation goes way down—for decades. Most people who used to come to recreate at Walton Lake on a regular basis will likely no longer come at all. This is an obvious example of why theoretical long-term benefits make no difference for justifying the proposed action (or even logging at all) when the immediate impacts could be so devastating to recreational use, scenic views, sense of place, ecological integrity, the naturalness of the recreational setting, the peace and calm of being away from being immersed in industrial settings all the time, etc. The list could go on and on.

The negative impacts of virtual clearcutting and logging large trees would not be short-term, but last far longer than 10-15 years. Those impacts would persist for more than a century, as the missing large trees would not be replaced for at least that long, if ever, and the clearcut converted into a plantation of young trees of different species would be irrevocably altered and unnatural.

It is completely disingenuous for the Forest Service to claim that: "Alternative 2 is consistent with the goals and objectives for the Developed Recreation Management Area because in the long term, the activities will provide for a safe, healthful, and aesthetically pleasing facility." (Revised EA p. 58) How would the proposed action, Alternative 2, possibly meet the goals and objectives for the Developed Recreation Management Area now or for decades? It won't. There is absolutely no guarantee that these objectives would be met in the long-term, as logging tends to beget more logging, especially when a mature and old growth relatively natural stand is converted into an even-age, timber industry preferred tree species plantation.

All species of large trees are "socially valuable", not just the Ponderosa pine singled out for this designation on Revised EA p. 59.

Contrary to the Forest Service assertion to the contrary on Revised EA p. 59, alternatives 3 and 4, while not our choice, would actually meet Management Area objectives better for a Developed Recreation area than the proposed action. The No Action alternative would meet those Management Area objectives better still, based on retaining the primary emphasis on a natural outdoor setting, which is what recreationists seek in coming to Walton Lake.

There is only one sentence in the inadequate cumulative effects analysis for alternatives 3 and 4 regarding the public closure, which wields the closure as a threat if the proposed alternative is not chosen and does not disclose the fines for violation of the closure or the already fully marked timber sale within the closure:

"A public closure that would remain indefinitely is in contrast for the access and enjoyment of recreation within its boundary."

The threat is reiterated in different words for direct and indirect effects analysis for both alternatives 3 and 4. For alternative 3: "The untreated acres (about 21 acres) will remain a public endangerment and closure by Forest Order would continue. These acres would be off limits to the public and could only be appreciated from a distance when walking the road." (Revised EA p. 59) For alternative 4: "Those untreated acres are a public endangerment and is (sic) in contrast to the safety requirements and expectations as defined in Forest Service standards and guidelines for managing Developed Recreation Areas. Under Alternative 4, the area of LRR infestation within the Developed Recreation Management Area would continue to be closed to the public for the foreseeable future. These acres would be off limits to the public by Forest Order." (Revised EA p. 60)

So when did the Forest Service standards and guidelines for managing Developed Recreation Management Areas change? They have not changed since these standards and guidelines are embedded in the Forest Plan. Only the Forest Service perceptions (or more precisely, justifications for logging a popular recreation site with significant old growth forest) changed. <u>There is no real justification for legitimate immediate hazard tree felling not being sufficient for public safety, because that is what the Forest Service is currently doing for public safety in accordance with the Forest Plan, and at Walton Lake for decades, including during the last few summers since this timber sale was first proposed.</u>

In comparing alternative 4 to alternative 3, the Forest Service states the following:

"Unlike Alternative 3, this alternative has no added benefit of safety buffering along the entrance or loop roads which is necessary to keep open and maintain the facility." (Revised EA p. 60) This is incredibly duplicitous, as the whole Walton Lake Recreation Area has been open for decades and for summers since this timber sale was first proposed without this "added benefit of safety buffering along the entrance or loop roads which is necessary to keep open and maintain the facility." If this safety buffering is necessary to keep the facility opened and maintained, why has it been open without this safety buffering for decades, and for summers since the Walton Lake project was first proposed? There seems to be a pandemic of dishonesty spreading from the White House. Fortunately the Forest Service still has a chance to assert its integrity by scrapping this Walton Lake timber sale.

<u>Scenic Quality effects section:</u>

The Scenic Attractiveness of a landscape designation of "Typical" for the Walton Lake area does not account for why so many people go there for recreation.

"Walton Lake is the most visited recreation facility in [the] Ochoco National Forest, receiving 15,718 visitors in 2018. Visitation has been increasing by 3-5% annually….Walton Lake generates the most combined revenue for camping and day use on the Forest, providing the highest level of facility development and services available…..Visitors come to Walton Lake to enjoy [an} idyllic lake setting, the fishing opportunities, and surrounding scenery….Day use is primarily focused on the lake as a destination for fishing, water play, picnics and short walks around the area which may include hiking the established trail or venturing into the adjacent area for bird watching, mushroom picking, walking dogs or other interests….Campers enjoy all the benefits of day use activities plus the added convenience of

having more leisure time at the site which can be used to explore beyond the lake to adjacent areas on the forest." (Revised EA, all on page 53, with some commas added for clarity)

Clearly the Walton Lake recreational experience is scenic enough, relaxing enough, and has enough natural setting diversity to attract the most visitation for any recreational site on the Ochoco National Forest. This hardly rates as just "Typical." "Typical" for most people could be a parking lot outside a box store, a view of a cattle pasture with cows (for rural local visitors), an obviously logged site or an even-age tree plantation on a National Forest. The latter logging outcomes would typify the resulting degradation from planned logging at Walton Lake, not the current condition. The "Typical" designation ignores all the natural values that make Walton Lake an attractive recreation destination. "Typical" seems like a purposeful diminishing of the natural setting attractiveness, which includes large and old growth trees (many of which are now planned to be eliminated), the lake itself, the associated birds and wildlife, wild flowers, interesting and secluded topography, and memorable recreational experiences based on this natural setting.

The "Typical" designation is also a broad brush approach that ignores the difference between staying only in the most developed campground (but still having a nice view of the lake, perhaps enjoying fishing and watching the kids experience Nature) and more sustained and attentive Nature observation, such as my experiences at Walton Lake of observing and photographing a muskrat foraging on the edge of the lake close by and watching an aquatic garter snake eating a crayfish. I have never before or since had the opportunity to see an aquatic garter snake eating a crayfish or watch an unperturbed muskrat nibbling riparian plants at close range. These experiences make the Walton Lake special to me. Swimming in the lake with a friend, feeling immersed in natural beauty all around us also has made Walton Lake memorable and special to me. Many people coming to Walton Lake have such experiences interacting with Nature there. People are not just coming to Walton Lake for the developed facilities, but for the natural outdoor setting, which forms the backbone of protective Management Area designation for Walton Lake that would be violated through planned heavy logging, extensive commercial thinning, and removal of many large and old growth trees.

The Revised EA defines "Landscape Character" as follows:

"Landscape character is an overall visual and cultural impression of landscape attributes—the physical appearance and cultural context of a landscape that gives it a "sense of place" (USFS 1995d). Landscape character includes all elements that contribute to the identity of a place or ecosystem including aesthetics (perceivable sights, sounds, smells, tastes, and physical contacts); social context (community, cultural, economic, historic, recreational, and spiritual); and biophysical aspects (land, water, vegetation, atmosphere, climate, wildlife)." (Revised EA p. 63)

It is this sense of place that would be lost with the logging removal of so many trees, which equate to more intact forest canopy, shade, associated wildlife, the sound of the wind through the trees, a natural appearance, physical contact with a relatively natural forest, associated plants, etc.. This would result not only from the proposed action and alternative 3 virtual clearcutting, but also through the planned intensity of the commercial thinning. Sense of place would be destroyed also with the removal of large and old growth trees, which resonate with people as artistically beautiful, a reminder that there is a world beyond people with living beings that have experienced more than a century of life in that place, and spiritual solace that is found in the presence of large and old trees. Sense of place associating Walton Lake with treasured recreational memories is also lost if the birds seen before no longer come

there, if the lake and streams are choked with logging sediment, and if naturally appearing green, shady, diverse moist mixed conifer forest is replaced with a clearcut artificially planted with seedlings of only two species and appears for decades thereafter as a young, potentially sickly, even-age stand that is maintained as a timber plantation.

The commercial logging alternatives proposed for Walton Lake would all destroy the sense of place associated with the recreational area. Even swimming in the lake would not be the same without the beautiful backdrop of old growth and large fir canopy where the virtual clearcut would take place, which is visible from the lake. Exploring the Walton lake recreational area would not be the same with fresh stumps all over the landscape, missing large trees, and signs of heavy equipment ground disturbance throughout the area, all of which is planned to result from logging alternative 2 and 3, and to a lesser extent, but still very evident, with the commercial thinning planned for alternative 4, even without the clearcutting and logging of large trees. Nature education for kids would not as rewarding and inspirational with a recreational setting that is highly altered by logging.

The Revised EA claims that the current condition of the forested parts of Walton Lake are quite different from historic conditions. Regardless of whether this is accurate, recreational visitors come for the forest setting in its current condition, including historic features such as old growth trees, more intact moist mixed conifer canopy (which is naturally denser and shadier), and what are still very open views immediately around the lake which are likely very close to the presumed historical condition. The areas only slated for non-commercial thinning are only planned for that because they are already open with large and old growth Ponderosa pine and some Western larch and already include big meadows and riparian hardwoods. It is actually not completely true that the Walton Lake area is "quite different" from historical conditions. The area still has greatly varying tree density except for parts of the moist mixed conifer where the overstory larger and old trees were logged out in the past—which is planned for repetition now and would further move the forest away from its historical condition.

The historic condition in the moist mixed conifer area south of the lake was old growth and mature mixed conifer on a moist site with a north aspect slope that currently still includes a lot of old growth historic fir and large fir that would replace the old growth over time—except that they are planned for removal. Even this denser moist mixed conifer forest still has numerous small openings and is self-thinning, thanks to natural disturbances, including the laminated root disease. The moist mixed conifer area (which encompasses sale units 2, 3, and 4) retains greater moisture to support more firs based on exposure to moisture off the lake, streams and seasonally wet areas, a north aspect slope that helps retain snow pack moisture, and ash soils that retains moisture much more than clay soils. After all, this area, despite now being delineated at only 35 acres, still has a great number of old growth and large firs—at least 521 of them, which are planned for elimination. So the planned virtual clearcutting would move the moist mixed conifer forest away from its historic condition.

The Revised EA complains that: "The historic mosaic pattern of patches of trees, individual trees, and openings has been replaced with dense, continuous stands of trees." First, the moist mixed conifer area, as stated above, would naturally and historically be denser, but now has more dense continuous stands of trees where the overstory was logged out in the past, not so much where the existing old growth and large firs now exist and not in the small clearings created by the root disease. Yet the logging proposed would eliminate the remaining overstory large and old fir that create and maintain natural variability and replace that with a monotonous even age stand of different tree species. Second,

the EA statement about replacement of patches of trees, individual trees, and openings with dense continuous stands of trees is simply not true on the ground in the drier mixed conifer commercial thinning sale units. These stands are highly variable, with large and small openings, patches of trees, and individual large trees. We know this because we thoroughly field surveyed all the proposed sale units.

Further, the drier mixed conifer sale unit areas are not that dry. Within sale unit 1 there is a prominent stream drainage, a boggy area, a landslide slump area, all within the "dry" mixed conifer area, which has a relatively moist Grand fir plant association. Unit 5 is adjacent to a riparian drainage and faces the lake. These sale units are drier than the moist mixed conifer area slated for virtual clearcutting but sale unit 1 in particular still has a good mix of tree species reflecting the moister slope aspects, drainages, proximity to water, and ashy soil occurrence. These include large and old growth Douglas fir and Grand fir as well as large and old growth Ponderosa pine in drier areas and large and old growth Western larch. The topography of sale unit 1 is relatively complex. There is also ample evidence of past logging of large firs in sale unit 1, including a lot of large fir stumps from apparent hazard tree removal near Forest Service road 22.

Inadequate analysis:

So the claimed "quite different" existing condition from historic conditions is overstated, with no recognition of the many nuanced conditions on the ground, including topography, the presence of ash soils, moister plant associations, evidence of historic old growth fir, riparian moisture access and retention, and the effects of past logging. Changes from the historic condition that do exist are not just from wild fire suppression but also largely from the effects of past overstory removal logging, past commercial thinning and continuous hazard tree removal of mature and large firs. More accurate in-depth analysis based on site-specific conditions on the ground would have revealed what I just described above rather than obscuring these place-based nuances and the effects of past logging, apparently in order to justify more commercial logging.

Past commercial removal of overstory mature and large trees, including hazard tree logging, contributed greatly to the in-growth of young dense fir in sale units 2, 3, and 4, where this logging occurred. This is an important disclosure for the EA to include, since the rationale for further logging of mature and large trees up to clearcutting intensity is partially based on the EA's claim that the dense younger firs are from wild fire suppression, with no mention of the effects of past logging contributing to this condition. The "risk" of wild fire based on these conditions is then used to justify logging that would reproduce dense young stand conditions, increasing flammability by removing more fire resistant large trees and overstory canopy that otherwise limits the density of younger trees based on access to sunlight.

Planned commercial-size logging threatens loss of "the natural features of an intact landscape" (Revised EA p. 66) that makes the Walton Lake area special and attractive for recreation.

Why is "Sanitation Harvest" virtual clearcutting not included in the list of management activities having potential to negatively affect landscape character and scenic integrity? (See REA p. 66)

The analysis of the No Action alternative for scenic quality is another biased analysis of this alternative since No Action would not inevitably result in loss of the large fir trees, many of which are not even

infected by the laminated root rot. The assumption of continued root rot spread, while finally admitted to be slow, over many years, fails to account for disturbances such as wild fire and changing climatic conditions. The "root disease climax community" is also not inevitable and would also not be the end of the world. (See my further comments on this in the recreation section.)

Most of the legacy old growth Ponderosa pines around Walton Lake appear to be healthy and not particularly stressed except for a minority surrounded closely by small trees (i.e. up to 8-9" dbh). We care about the legacy old and large fir, not just about legacy Ponderosa pines. The legacy Ponderosa pines are declared as threatened by competition from "fast-growing understory trees" (most of which are small, not mature or large) and bark beetle, seemingly to force acceptance for mature and large fir logging over No Action.

Alternative 2 is described in a highly biased pro-logging way for effects to scenic quality, failing to admit that the "Sanitation Harvest" would look like (and be like) a clearcut, a stark and visually jarring departure from the current green mature and old growth fir forest there.

The effects analysis for visual quality effects to the moist mixed conifer area that would be clearcut fails to take into account the transformation of diverse mature and old growth moist mixed conifer forest to a virtually sterile clearcut planted with seedlings of only two tree species. This represents a loss of sense of place regarding the landscape character. This logging transformation would be enough to drive most recreationists away from Walton Lake and keep them away for many years or permanently. Sense of place is very important for the desire to return to a treasured recreational area associated with fond memories of past experiences there in the original, relatively natural forest setting. Yet despite the description of landscape character as a sense of place, this loss is not considered at all in the Revised EA analysis.

Changing the Visual Quality objective and Scenic Integrity level from Retention/High to Modification/Low defeats the purpose of the Forest Plan granting the Walton Lake area the protective standards and guidelines for management associated with the Developed Recreation Management Area emphasis, standards and guidelines.

The Forest Service and timber industry workers are the only ones who see a forest as "over-stocked", not most recreationists. The forest is not a grocery store shelf designed purely for extraction.

"Healthy" is not the public perception equivalent of visually attractive or a natural outdoor setting. Extensive obvious commercial logging planned also for large fir removal in sale units 1 and 5 should not still be considered retention of visual quality and high scenic integrity compared to the original conditions of the stands being rated that way. (See Revised EA p. 69 , 2nd par.) Extensive commercial logging creates far more open stands littered with stumps, skid trails, and other ground disturbance and missing many mature and large trees, reducing shading and the feeling of the stand being a natural forest. These logging effects would be visible from the campgrounds, the day use area, the lake, and parts of the loop road.

Ten years (actually much longer) of change from retention of visual quality and high scenic integrity to (heavy) "modification" of visual quality and low scenic integrity for 35 acres in a small popular recreation area is a significant negative effect to the recreational appeal and scenic integrity of the Walton Lake

area that should not be allowed and should not justify use of Forest Plan amendments in order to effectively violate Forest Plan management area standards and guidelines.

Inadequate cumulative effects analysis:

Actually cumulative effects to landscape character and scenery are not limited to Forest Plan amendments. This is inadequate cumulative effects analysis since Walton Lake logging degradation of landscape character and scenery are cumulative with the visible adjacent logging of the Canyon timber sale, increased development of the Walton Lake Developed Recreation area over time, evident hazard tree felling every year, and the effects of past logging within the Developed Recreation area and around the Walton lake area, along with livestock impacts in the larger setting around Walton Lake. More and more impacts to visual quality and scenic integrity can be expected to lead to less and less recreational enjoyment and use over time.

Clearcutting, reforestation with planted seedlings and the resulting even-aged plantation have visual degradation impacts that last for many decades, not just the alleged "short term of up to 10 years." (Revised EA p. 69, under "Alternative 3") These long-term impacts result in a loss of sense of place.

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