Date submitted (UTC-11): 3/16/2020 2:23:40 PM First name: Asante Last name: Riverwind Organization: GaiaKi Title: Ecological Consultant Comments: March 16, 2020 Slater Turner, District Ranger, 3160 NE Third Street, Prineville, Oregon, 97754 Cc: Beth Peer, Ochoco National Forest, (541) 416-6463. http://cara.ecosystem-management.org/Public/CommentInput?project=47019.

Public Comments on the Proposed Walton Lake Management Project and related proposed actions

The proposed actions of the Walton Lake management project are of significant concern to many of us who treasure both this specific project area, and the greater Ochoco National Forest ecosystems of which it is an inextricable critically important component. The following notes some of my specific concerns:

1. The Forest Service is once again misusing the guise of so-called 'public safety' and mischaracterized 'hazard' trees as a pretentious excuse to attempt logging in the Walton Lake recreation area. This thinly disguised logging project is being proposed despite the fact that the Forest Service is already capable of taking necessary action to remedy situations that actually have real 'hazard' trees present. The Forest Service has maintained public safety in the area for decades by annually inspecting for and removing true hazard trees. The USFS still offers no explanation; scientific, ecological, or even economic; why it has instead chosen to unnecessarily expand the scope of such activities into a full-on logging project.

2. In this unwarranted project, the Forest Service egregiously proposes the ecologically devastating logging of large mature and old growth trees; clearcutting (called "Sanitation Harvest" for this sale); logging of popular recreation sites; and use of Forest Plan amendments to enable violations of Forest Plan standards and guidelines that serve to protect wildlife habitat and recreational values.

3. The proposed actions involving heavy logging to reduce root rot are inconsistent with the purpose and need to increase public safety and maintain a natural outdoor setting for recreation. Credible, abundant scientific research clearly concludes that commercial logging will not address perceived root rot issues, as such processes are natural and essential components of the forest. Furthermore, the resulting logging would be an unnatural repugnant clearcut in an otherwise beautifully treasured recreation area.

4. The Walton Lake proposed project area provides essential habitat for a wide range of wildlife species, including pileated woodpeckers, northern flickers, pygmy and flammulated owls, and a wide range of migratory and native songbirds (all of which would be harmed by the proposed removal of large trees which currently provide habitat for nesting and snags and logs for foraging); black bears (who forage in large logs and snags); elk, deer, and wild horses who use the forest for thermal and hiding cover when coming to drink at the lake; a variety of songbirds that would be harmed by removal of shrubs and denser forest; and potential predators such as marten, who need abundant down logs for winter foraging under snow and Gray wolves, who need hiding cover to protect themselves from people shooting them (as well as cover for effective hunting).
5. Based upon the preponderance of ecological science, and my long familiarity of the greater area, it is clear that the entire project as proposed must be dropped. If for some rationale the agency feels it is necessary to proceed with a management project in this location, federal environmental policy laws are explicitly clear that such can only be legally done by initiating a full-scale Environmental Impact Statement public process. Such a

process must notify and solicit public comment with widespread public outreach that includes the hometowns and cities of recreational visitors, especially those within the greater accessible region, including Portland and Eugene.

6. The proposed logging and related management actions at Walton Lake would irretrievably harm the recreational enjoyment of many people who seasonally frequent the area.

7. Given the current comment period on the proposed management actions, based upon credible ecological science and site-specific first-hand knowledge, my recommendation is the No Action alternative, modified to end the public closure on the root rot areas, and to re-mark the cancelled timber sale that is already marked to cut within the closure and in other sale units by blacking out all markings for cut or leave trees and removing all flagging and unit boundary signs. Retention of the warning signs around the root rot areas are a reasonable part of the No Action alternative that could be used. There is no need to log mature and large trees in the Walton Lake area. The Forest Service already identifies and fells legitimate hazard trees that could threaten

public safety in the recreational use area every year. This would not change regardless of the outcome of this sale.

In conclusion, I look forward to reviewing your responsible response to public comments on this proposed project, and sincerely and emphatically request the project as proposed be dropped in its entirety. For Wild Wondrous Nature!,

Asante Riverwind GaiaKi