

VIA email: objections-pnw-regional-office@usda.gov

September 3, 2020

Regional Forester (Reviewing Officer) Pacific Northwest Regional Office Attn: 1570 Objections P.O. Box 3623 Portland, OR 97208-3623

RE: Walton Lake Restoration Project Objection

Pursuant to 36 C.F.R. § 218.8, the American Forest Resource Council files this objection to the proposed draft decision for the Walton Lake Restoration Project (Walton Lake). District Ranger Slater R. Turner is the responsible official. The Walton Lake project occurs on the Lookout Mountain Ranger District on the Ochoco National Forest.

Objector

American Forest Resource Council 700 NE Multnomah, Suite 320 Portland, Oregon 97232 (503) 222-9505

AFRC is an Oregon nonprofit corporation that represents the forest products industry throughout Oregon, Washington, Idaho, Montana, and California. AFRC represents over 50 forest product businesses and forest landowners. AFRC's mission is to advocate for sustained yield timber harvests on public timberlands throughout the West to enhance forest health and resistance to fire, insects, and disease. We do this by promoting active management to attain productive public forests, protect adjoining private forests, and assure community stability. We work to improve federal and state laws, regulations, policies and decisions regarding access to and management of public forest lands and protection of all forest lands. The Walton Lake project will, if properly implemented, benefit AFRC's members and help ensure a reliable supply of public timber in an area where the commodity is greatly needed.

Objector's Designated Representative

Irene Jerome, Consultant



Reasons for the Objection

The content of this objection below is based upon the prior specific written comments submitted by AFRC in response to the draft EA issued in 2017 and the subsequent revised draft EA issued in March 2020 which are hereby incorporated by reference.

AFRC has consistently supported the proposed work to improve public safety in the Walton Lake Project area from the original onset of the project in 2015. We have been concerned that the Purpose & Need for the project has not been met due to various public comments that do not support the work necessary based on varying ideologies. The Ochoco Land and Resource Management Plan (LMRP) identifies Walton Lake as a "Developed Recreation Area" with the emphasis for management: "Provide safe, healthful, and aesthetic facilities for people to utilize while they are pursuing a variety of recreational experiences within a relatively natural outdoor setting." (LRMP 4-71). The project area boundary is the same as the Developed Recreation MA boundary.

The purpose of the Walton Lake Project is:

- To address concerns about public health and safety within the 218-acre designated recreation area at Walton Lake.
- To address concerns related to resiliency of the legacy ponderosa pine and western larch that are iconic in this recreation area.

There is a need:

- To provide recreationists with a safer environment that minimizes the risk of falling trees in the Walton Lake recreation area.
- To protect the Walton Lake developed recreation area which is identified as critical infrastructure within the Wildland Urban Interface in the Crook County Community Wildfire Protection Plan due to public safety concerns related to the significant number of visitors to the area, particularly throughout the summer and fall when burning conditions are at their most severe.
- To thin overstocked dry mixed conifer stands to address concerns related to forest health, scenic values and public safety within the developed recreation area around Walton Lake.
- To address and prevent spread of laminated root rot which occurs in the moist mixed conifer stands in the planning area.

Resolution Requested

We ask that the Forest Service select and implement Alternative 2 as described in the Draft Record of Decision. If the Forest Service selects a different alternative or combination of alternatives, we ask that the Forest Service work with AFRC to craft a series of mitigation measures that achieve the same effect to adequately provide for public safety adequate and effective forest restoration within the project area boundary.

Request for Resolution Meeting

Pursuant to 36 C.F.R. § 218.11, the objectors request to meet with the reviewing officer to discuss the issues raised in this objection and potential resolution. In the event multiple objections are filed on this decision, AFRC respectfully requests that the resolution meeting be

held with all objectors present. AFRC believes that having all objectors together at one time, though perhaps making for a longer meeting, in the long run will be a more expeditious process to either resolve appeal issues or move the process along. As you know, 36 C.F.R. § 218.11 gives the Reviewing Officer considerable discretion as to the form of resolution meetings. With that in mind, AFRC requests to participate to the maximum extent practicable, and specifically requests to be able to comment on points made by other objectors in the course of the objection resolution meeting.

Thank you for your efforts on this project and your consideration of this objection. AFRC looks forward to our initial resolution meeting. Please contact our representative, Irene Jerome, at the address and phone number shown above, to arrange a date for the resolution meeting.

Sincerely,

Travis Joseph President

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