

**Janet Hutchison, Chairperson
Ochoco Forest Restoration Collaborative (OFRC)
439 SW First Place
Prineville, OR 97754**

September 5, 2023

**Jennifer Abernathy, NEPS Planner, Lookout Mountain Ranger District
Ochoco National Forest
3601 NE Third Street
Prineville, OR 97754**

Dear Ms. Abernathy:

OFRC appreciates the opportunity to respond to the Mill Creek Dry Forest Restoration Project Draft Environmental Assessment (EA) project number 58051. This project is located on the Ochoco National Forest within the Lookout Mountain Ranger District. The below comments are in response to the above analysis.

Issue No. 1. On page 2, states the Purpose and Need for Action. We support the six points on this purpose and need, the increased resilience to insect, disease, fire, and drought.

Issue No. 2. On page 14, under Alternatives and Project Design not Considered in Detail, first paragraph, "The Id Team considered including an alternative that would only remove large grand fir trees in the circumstances described in Ochoco Forest Collaborative's Dry Forest Recommendations....Because the Pacific Northwest Region undertook an effort to update large and old tree guidance, the Forest incorporated that into Alternatives 3 and 4 rather than the collaborative's guidance."

Suggested Remedy: The Dry Forest Recommendations were completed in January of 2017 and does not reflect the guidance and regulations in the Eastside Screens which allows for removal of trees 21" and above. Implementing Eastside Screens would enable some of the recommendations in the Dry Forest Recommendations. Specifically, on page 1 it states, "The reduction and removal of some of the overabundant grand fir and Douglas fir (both fire – and drought – intolerant species), while maintaining older, fire- tolerant and drought – tolerant tree species like ponderosa pine." On page 9 it states, "Use restoration treatments to shift species composition to ponderosa pine dominance and reduce western juniper prevalence..." On page 10 it states, "Use restoration treatments to shift species composition to ponderosa pine dominance and reduce Douglas-fir and grand fir prevalence..." We support utilizing the Eastside Screens.

Issue No. 3. On page 25 & 47, under Cumulative Effects All Action Alternatives, it states, "The Lemon Gulch Trails Environmental Assessment is currently in the planning stages." It also repeats the same four paragraphs under this heading.

Suggested Remedy: The Lemon Gulch Trails Environmental Assessment is not currently in the planning stage, it has been completed. Discussion should be around the decisions made in the Decision document. Also is there something in regulations that does not allow you to make reference on page 47 to page 25?

Issue No. 4. On page 25, 33, 37, & 46, under Cumulative Effects Action Alternatives, it states, "The Lemon Gulch Trails Environmental Assessment is currently in the planning stages." It also repeats the same four paragraphs under this heading,

Suggested Remedy: Same as the previous comment.

Issue No. 5. On page 35, under Common to all Action Alternatives, third paragraph states, "Reducing the abundance of grand fir would reduce the future impact of fir engraver, which is highly interactive with drought-stressed trees."

Comment: This adheres to the OFRC Dry Forest Restoration Recommendations.

Issue No. 6. On page 173, under Effects Common to All Action Alternatives, states, "These treatments will also improve conditions for riparian hardwood growth where they historically occurred and in greater diversity and abundance."

Comment: This adheres to recommendations in the OFRC Riparian Zones of Agreement.

Issue No. 7. On page 225, under Alternatives 2, 3, and 4, it states, "Increased availability of space, light, and nutrients would increase forage quantity and may increase forage quality.... Grazing management practices would be expected to improve with the increase of accessibility for herding cattle because of the removal of trees that would open dense tree stands."

Comment: This adheres to recommendations in the OFRC Dry Forest Recommendations.

Issue No. 8. On page 238, under Alternative Comparison, second paragraph, states, "Alternative 3 will have the most economic impact overall."

Comment: This adheres to the OFRC Values Categories for Dry Forest Recommendation Process.

OFRC generally supports Alternative 3 of the draft EA. The reasons for this support are as follows:

- This alternative reduces insect and disease risk to the greatest degree of all alternatives.
- This alternative moves closest towards range of LOS-related desired future conditions, and
- Additionally, the removal of these specific trees would transition the species composition toward more fir-tolerance.

Sincerely,



Janet Hutchison

OFRC, Chairperson