

Janet Hutchison, Chairperson
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Prineville, OR 97754

November 29, 2023

Beth Peer, NEPA Coordinator
Ochoco National Forest
3601 NE Third Street
Prineville, OR 97754

Dear Beth:

OFRC appreciates the opportunity to respond to the North Fork Crooked River Forest Resilience Project Draft Environmental Assessment. This project is located in the Ochoco National Forest within the Paulina Ranger District. The below comments are in response to the above analysis.

Specific objectives of Alternatives Two and Three that OFRC supports are:

- Decrease tree density, maintain ponderosa pines, and create open stand conditions where lacking.
- Maintain large, old trees and related values connected with wildlife habitat throughout the planning area.
- Reduce hazardous fuels and the risk of uncharacteristic wildfires.
- Improve or maintain riparian habitat conservation areas.
- Provide wood products to the public.
- Reduce open road density.

Thinning Treatments:

The OFRC's Dry Forest general recommendations are to reduce true fir populations, and to maintain ponderosa pine populations in Dry Forest habitats in the Ochoco National Forest. For this reason, this project objective aligns with this existing document.

Maintaining Large Old Trees:

We support the general treatment guidelines of thinning trees from below, removing the smallest and least fire resilient trees first until the desired density is achieved, removing grand fir before ponderosa pine. For this reason, this project aligns with our Dry Forest recommendations.

Reducing Hazardous Fuels:

This project supports the Dry Forest Recommendations for the Forest Service to embark on projects that improve community safety and resiliency. It also supports our Riparian Zones of Agreement by reintroduction of fire into riparian areas as one of the many tools available to restore riparian areas.

Riparian Habitat Conservation:

This project's draft EA addresses several factors related to the OFRC's Riparian Zones of Agreement:

- *OFRC supports activities that suppress the encroachment of conifers in Riparian Conservation areas to promote the natural regeneration of hardwood habitat and a variety of shrub species native to the forest.*
- *We agree that a priority objective for riparian restoration should be reducing peak high flows and incisions in our streambanks. The overabundance of conifers in our riparian landscape has directly amplified this issue.*
- *In the short term the harvest activity would reduce coarse woody debris on the project however, in the long-term harvest activities are expected to produce sufficient coarse woody debris material to restore RHCA's. In our Riparian ZOA's we support a minimum desired woody debris of 20 pieces per mile but in the long term we would like to see an elevated target of up to 80 pieces per mile.*

Wood Products to the Public:

In OFRC's Dry Forest Recommendations we support fiscally responsible forest projects that have economic benefits for the local community. Both alternatives presented in the project provide financial opportunities, which we support.

Reduce open road density:

As a part of the OFRC's Riparian ZOA's we believe that the Ochoco National Forest should conduct analysis at the project level to determine what roads are causing aquatic resource damage. The forest should undertake an analysis at the project level to determine what roads are causing aquatic resource damage and propose road treatments (rerouting and alternative access) and stream realignment to address the adverse effects of those road segments. In general, we support the reduction in density of roads to support riparian restoration, but we would like some additional analysis on how the proposed alternatives would impact the riparian areas.

The two main differences in Alternatives Two and Three in the environmental assessment are:

1. Alternative two proposes to remove some young grand fir over 21" DBH in some LOS in the project site whereas alternative three would only remove trees under 21" DBH.
2. Alternative two proposes to pursue commercial and non-commercial thinning in RHCA's whereas, alternative three would only involve non-commercial thinning in RHCA's.

The Forest Service states that there are site specific locations where the desired density range for future conditions is unachievable without removing trees over 21" DBH, which tend to be within late old structure stands. The OFRC generally supports the forest service cutting some young grand fir trees over 21" DBH to achieve desired future conditions of the project site. The forest composition of the Ochoco National Forest has changed over the last century to a less resilient landscape and so to achieve the desired future conditions outlined by the Dry Forest Recommendations and the Eastside Screens comments, we support the removal of these trees.

The Forest Service states that alternative two would provide significantly greater economic and employment benefits compared to alternative three. The OFRC generally supports thinning in RHCA's as proposed in this EA for alternative two. The OFRC is supportive of sustainable forest management practices that create economic benefits for local communities, and we feel that implementing commercial thinning in conjunction with non-commercial thinning would make this project economically viable.

For the above reasons, OFRC generally supports Alternative 2 of the draft EA for the North Fork Crooked River Forest Resilience Project. However, we would like further clarification on the impacts of roads within riparian areas for this project.

Sincerely,



Janet Hutchison

OFRC, Chairperson