

Janet Hutchison, Chairperson  
Ochoco Forest Restoration Collaborative (OFRC)



April 9, 2024,  
Jennifer Abernathy, NEPA Planner,  
Lookout Mountain and Paulina Ranger districts  
Ochoco National Forest  
3601 NE Third St.  
Prineville, Oregon 97754

Dear Ms. Abernathy,

Ochoco Forest Restoration Collaborative appreciates the opportunity to respond to the Corral Flat Endurance Trails Project Draft Environmental Assessment (EA). This project is located on the Ochoco National Forest within the Lookout Mountain and Paulina Ranger districts. The below comments are in response to the above analysis.

- Chapter 2, Proposed Action, 1<sup>st</sup> paragraph, 2<sup>nd</sup> sentence, "...berms, tanks traps – should be tank, delete the s..."
- Chapter 2, Proposed Action, 1<sup>st</sup> paragraph, 6<sup>th</sup> sentence, "...overall goals in – should be goal, delete the s..."
- Chapter 3, Environmental Consequences, 2<sup>nd</sup> paragraph, 1<sup>st</sup> sentence, "...in the Final Environmental Impact Statement – needs to add (FEIS), ..."
- Chapter 3, Recreation, Trail Miles, Existing Condition, 2<sup>nd</sup> paragraph, 2<sup>nd</sup> sentence, "...that would add trails – should be trail, delete the s, ..."

- Chapter 3, Wildlife, Potential for adverse change in amount of suitability of habitat, 4<sup>th</sup> paragraph, 1<sup>st</sup> sentence, "...headwaters of Ochoco creek – Creek needs to be capitalized..."
- Chapter 3, Botany, 1<sup>st</sup> paragraph, last sentence, "...on these species is – should be are..."
- Chapter 3, Botany, Issues Addressed, 1<sup>st</sup> Issue, "...Riparian Habitats/Wet Meadows/GDEs – what does GDEs stand for..."
- Chapter 3, Invasive Plants, Methodology, 6<sup>th</sup> sentence, "...plant species is – should be are..."
- Chapter 3, Invasive Plants, Existing Condition, 2<sup>nd</sup> paragraph, 4<sup>th</sup> sentence, "NFS – what does NFS stand for..."
- Chapter 3, Environmental Consequences, **Cumulative Effects Consideration**, Table 3: What is your definition of fuels management under Spears Vegetation Management Project, Canyon Fuels and Vegetation Management Project, and Howard Elliot Johnson Fuels and Vegetation Management Project. Does this include prescribed burn? Also, under Reasonably Foreseeable Future Projects: there is no mention of prescribed burns. So, are none occurring in this project area in the future?
- Chapter 3, Hydrology and Aquatic Species, **Environmental Consequences**, 2<sup>nd</sup> paragraph, 3<sup>rd</sup> sentence, states, "Due to the high level of consistent use, there is a high level of existing disturbance and potential stream and riparian area effects within a majority of the project area." Additionally in Chapter 3, Hydrology and Aquatic Species, **Direct and Indirect Effects of the Proposed Action**, 2<sup>nd</sup> paragraph, 1<sup>st</sup> sentence, states, "There are a total of 53 trail crossings on RHCA areas, with up to 17 sites not associated with existing Forest Service system roads (Figure 7)." *In OFRC's Riparian Zones of Agreement, under Recommendations for Riparian Areas, under number 8, Recreation, 2<sup>nd</sup> sentence states, "We recommend that planning and projects pertaining to trails, campgrounds, and dispersed camping seek to minimize and mitigate recreation impact on Riparian Habitat Conservation Areas (RHCAs)." How do you plan to minimize and mitigate recreation impacts on RHCAs?*

- Due to lack of clarity in the maps provided we were unable to confirm whether the road closures proposed were all designated closed by previous NEPA documents. We ask that the forest service perform their due diligence to ensure that all physical road closures proposed in this project were designated closed previously in order to uphold the agency's multiple use mission.

We acknowledge that there will be some short-term impacts to riparian zones due to project actions but weighing the short-term impacts to the long-term environmental benefits, we feel these impacts are merited. The collaborative asks that the forest service do their due diligence to mitigate these impacts to RHCAs.

Sincerely,

A handwritten signature in cursive script that reads "Janet Hutchison". The signature is written in dark ink and is positioned above the printed name.

Janet Hutchison,

OFRC Chairperson