Data Submitted (UTC 11): 9/7/2023 6:36:40 PM
First name: Sarah
Last name: Puerner
Organization: Crook County
Title: Exec. Admin Assistant
Comments: September 7, 2023

Jennifer Abernathy, NEPA Planner, Lookout Mountain Ranger District
Ochoco National Forest
3160 NE Third Street
Prineville, OR 97754

Response to Mill Creek Dry Forest Restoration Project # 58081, Draft Environmental Assessment

Crook County thanks you for the opportunity to respond to the Draft Environmental Assessment (EA) for the Mill Creek Dry Forest Restoration project # 58081. Enclosed you will find comments, concerns and general support for Alternative 3 of the draft EA. The Crook County Court is the Board of Commissioners for Crook County, Oregon. In 2017, Crook County adopted its Crook County Natural Resources Policy. The policy, developed with the citizens of Crook County, serves as a guide for the County's interaction with local, state and federal land management agencies in regards to natural resource issues.

In the matter of the Mill Creek Dry Forest Restoration Project, the comments that follow are in support of the adopted Natural Resources Policy. After reviewing the draft EA, Crook County generally supports the selection of Alternative 3 with minor modifications. County recommendations are listed below.

Purpose and need:

Increased resilience to insect, disease, fire and drought

* Support the 6 points on purpose and need. Need to manage for healthy forests, reduced catastrophic wildfire risks and impacts of drought (disease and insect impacts on stressed trees), and the need to reverse the conversion of pine to fir dominated stands.

Generally, and particularly during a period of drying and warmer climate, basal area of ponderosa pine stands should be reduced to 40-60 sq. feet of BA/acre to be healthy and resilient. Targeting a 40-60 BA is also representative of historic natural fire regime conditions on dry ponderosa sites. Ecology and Management of Eastern Oregon Forests. Manual 12, (2018) Pg. 59, table 3.4. Hagmann, R.K., et al. Historical structure and composition of ponderosa pine and mixed-conifer forests in south-central Oregon. Forest Ecol. Manage. (2013). Perpetuating old ponderosa pine. T.E.Kolb et al. Forest Ecology and Management 249(2007) 141-157. A few large older trees per acre with grass understories likely predominated. This would require removal of most of the other competing species, Douglas and white fir. Selected wildlife habitat areas with thicker escape and resting cover conditions should be specifically provided.

Enhance and restore stream channels and riparian areas

* No mention of impacts of increased conifer within riparian zones and impacts (competition) with hardwoods, stream shading and bank stability (addressed to some degree in discussion of public scoping). Increased density of conifer within riparian zones adds to the drying of these habitat types and the instability of the riparian channel,

and inhibits growth and recruitment of riparian vegetation, contributing to channel down cutting and widening and therefore riparian degradation.

In relation to grazing (grazing recommendations are not a part of this project) in some stream reaches, particularly meadows, livestock grazing should be analyzed for riparian impacts and appropriate grazing tools/approaches determined in collaboration with the permittees and management strategies implemented either through the annual operating plans or when the Allotment Management Plans are updated.

Supply Timber and Wood Products
* Agree with this purpose
Align road maintenance levels with travel management plan

* Generally the County opposes road closures but is willing on a case by case basis to accept minor changes when specific data exists to justify road closures.

General statements about impacts on wildlife and erosion are not considered to be justifiable. Road closures must also be justified in the areas of wildfire fighting, maintenance requirements of grazing permits, recreational access/hunting, and handicap access.

While the County understands this is not a grazing EA, the discussion of grazing impacts (pg 25) within the project area on current conditions express the fact that past grazing played a role in existing condition but fails to state how today's grazing practices (USFS 2010) are required to contribute to improvements in future conditions. The way this paragraph is written, the Forest is saying that grazing was a problem and there is nothing we can do about it which is not true.

Working closely with permittees and others, there are numerous approaches to improve range conditions that can work both for livestock production and land health. Where no satisfactory systems are available to protect land health, suitability for livestock grazing should be considered. Opportunities to make minor changes in grazing can be made through the annual operating plans or when the Allotment Management Plans are updated. Changes should be made only when monitoring data supports them.

Role of prescribed fire and impacts to the community:

The County recognizes the value of prescribed fire as a tool for managing forest vegetation. However, the County is concerned that the Forest relies too heavily on prescribed fire for meeting forest management objectives when other tools could accomplish the same outcomes and provide a positive impact to the Community (harvest more board-feet for sale) and reduce the negative impacts (smoke/air quality).

The Forest must coordinate prescribed fire activities with Mill Creek residents and appropriate County and City governments and citizens in order to minimize negative impacts.

The inclusion of thinning and fuels reduction in ALT 3 and 4 for the RHCA's is supported by the County. This must be done in order to meet forest and riparian management objections and desired outcomes.

With the addition of biomass treatment facilities in Prineville, this will enable more economically positive conversion and also improved carbon reduction/utilization. Additionally, there could be markets for smaller Douglas fir depending on timing of contracts, the plan must be able to take advantage of this.

The County supports the Forest in adopting a forest amendment which would allow appropriate and currently accepted ground-based harvest techniques on slopes > 35%. The County believes the Forest is wasting time and energy evaluating helicopter and high-lead logging systems.

These systems are not economically feasible in stands of such low timber volume. Analyzing such systems on the premise that they are available to help achieve forest management goals potentially requires tools that just are not available. Well established, cost effective winch-assist logging and winch-assist cut-to-length systems could be more appropriate for steep slopes and the County encourages the forest to evaluate them. The Forest should do a Forest plan amendment to address this.

The County is surprised to see the mention of Lemon Gulch Trails EA in the document (pg. 25, 33, 226) since this review and no decision notice were issued in April, 2023.

The County acknowledges that there is a significant amount of fir that is dying within the Ochoco National Forest, including the Mill Creek Area. This rapid die-off requires that the Forest act quickly and that its actions cover the greatest amount of area within the scope of approved EA and Decision Notices.

The County supports the scope of Alternative 3 with the allowance of the removal of >21" trees (emphasis on Fir types but not exclude pine if needed to meet stand requirements) and emphasizes the need to adopt current technologies/practices of timber harvest on steep slopes and eliminate analysis of harvest systems that are not viable or economically available at this time. Only 25 trees 21" diameter/acre equates to 60 sq. feet of BA, a reasonable maximum stocking level for most dry pine stands.

The County supports the control of non-native invasive plants and is supportive of actions proposed within the Mill Creek Vegetation Management Plan. The EA emphasizes the role of grazing livestock (pg. 96) as vectors for non-native invasive plants.

The EA fails to mention that wildlife also serve the same role as vectors with seeds or plant parts in hair, hoofs or manure. Monitoring wildlife migration routes and habitats for non-native plant movement followed by implementation of control measures should be emphasized by the Forest. Major emphasis should be place on invasive annual grasses such as Ventenata, Medusahead rye and cheatgrass as these species can contribute greatly to the initiation and spread of wildfire.

Hydrology and Aquatic Species:

The County supports the assumptions of water yield but notices the Equivalent Harvest Area (EHA) assessment (pg. 163) appears to fail to measure or at least state the benefits of additional soil water infiltration associated with decreasing tree (and tree canopy) density. Improved soil/water infiltration increases soil water volume and movement. The result is increased ground water and soil water contribution to stream flow, resulting in longer periods of stream flow with increased volumes of water.

Mill Creek is a major stream, contributing to storage in Ochoco Reservoir. Flows into and storage of water in this reservoir have been impacted by long term drought and landscape changes above the reservoir. Water storage in Ochoco Reservoir is critical to the economic stability of the County providing water for irrigated agriculture and recreational opportunities (fishing and boating). The increased water storage captured in healthy watersheds can also increase the time period for stream flow during late summer fall?

As noted on pg. 169, Alt 3 does generate the highest EHA index values. The County strongly encourages the Forest to increase long term water yield monitoring as a method to help determine if project outcomes are/have been met.

Range

The County supports the assumptions of forest management proposed in Alt's 2,3 and 4 in regards to the positive

responses to understory vegetation including grasses (livestock forage).

The EA fails to mention that increases in forage production will not lead to increases in permitted AUMs. The County assumes that the Forest and the permittees will take advantage of this benefit through the use of existing AUM's and the grazing schedule developed annually to implement the AMP's for each allotment within the planning area. Benefits to the healthy plant communities include reduced risk of invasive plant introduction and productivity and improved benefits to RHCA recovery rates due to improved distribution and timing issues.

Economics

The County appreciates the recognition of this plan on jobs and economic activity in the region. Not only does a sustained yield offering by the Forest support existing jobs, but it also generates interest in forestry careers by the younger generation. This is the pool of individuals that is necessary for future of the industry and the management of our forests, public and private.

It would be good to include the economics of biomass offerings. This is an emerging industry, utilizing a different product that what has been offered in the past from public lands. The City of Prineville is currently studying the opportunities to construct and operate a biomass utilization facility that could be a new addition to Crook County's economic activity. This facility, if constructed will add jobs not only at its location but additional jobs in the woods.

In closing, Crook County thanks you again for the opportunity to comment on the draft EA, Mill Creek Dry Forest Restoration Project. In general, the County supports the selection of Alternative 3 with minor modifications. Our input here includes those suggested modifications for the Final EA and Decision Notice. If you have any questions about our input, please do not hesitate to contact Tim Deboodt, Coordinator, Crook County Natural Resources.

Sincerely,