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Comments: RIGHT off the bat, you can't log Walton Lake now, as things stand, March 18th, 2020 in the middle of a global pandemic. And the reason is that wildlife viruses are jumping to human beings all over the world and one of the reasons is that humans are destroying habitats. Wildlife biologists know this, health experts know it, and increasingly the public knows it. And there are plenty of people to call upon to testify or to cite in a court going forward. Kate Jones, a US ecologist, says "We are researching how species in degraded habitats are likely to carry more viruses which can infect humans," she says. "Simpler systems get an amplification effect. Destroy landscapes, and the species you are left with are the ones humans get the diseases from." US Forests are included and Lyme Disease is the prime example.

<https://www.theguardian.com/environment/2020/mar/18/tip-of-the-iceberg-is-our-destruction-of-nature-responsible-for-covid-19-aoe>

I am a former Forest Service employee and I know that some of you in the wildlife shops know this about viruses.

In fact, ALL EMPLOYEES KNEW NOT TO LOG frequently-visited pristine areas OFFICIAL OR NOT. They used to be called in my day TLPAs, Tiny, Little, Pretty, Areas. The public comes to the forest campsites to view wildlife, be in wild nature on their own risk, and to be among big trees. They do not come expecting all the trees cut in the name of their safety from falling trees and wildlife scant because of no cover. Yes, a lot of downed trees blocks travel and can threaten hikers and campers. But this should not be used as an excuse to log.

Its time to stop destroying forest habitat and pretending its healthy for our forests, even good employment for our loggers, or prudent for avoiding litigation over an epidemic falling trees (which this project will NOT fix by logging old growth-in fact your own forest health report supports thinning of susceptible species, not logging. Also, citing lack of evidence for climate-change factors in Oregon and Washington forests does not seem to rule out evidence elsewhere. MORE LITERATURE REVIEW IS NEEDED THAN HAS BEEN DONE). Your botany report does not support the project at all and conveys yet more risk of invasive species and diseases if the action is taken. Don't expect to get away with nil consideration of the impacts of the action.

The timber sale is being conducted under the premise of addressing public safety by removing trees affected by root disease. But in fact, for most of the trees being logged, this will not be true, since the approach is to remove ALL trees in the 35-acre cutting areas (AKA clear-cutting). The expressed rationale to the sale is to log entire species, if they are "susceptible" to root disease. In fact, the method is labelled "Sanitation harvest" to falsely, and corruptly, imply this action will remove the disease for any length of time, and that this alleged accomplishment is worth destroying the recreation and wildlife values of the old growth stands around the lake. IF YOU WANT TO DO SOMETHING ABOUT ROOT ROT, First do no harm to functioning forest ecosystems and avoid disturbing and spreading spores with unneeded logging projects! Then, scale down to thinning and planting projects to manage species replacement. That's called management, it is targeted to the problem.

It might be argued that something needs to be done to address the unproven assumption there is a threat to the public. However, the agency is already free, without a logging project, to identify and remove diseased "hazard" trees using whatever informal identification or assessment criteria is available to most of its field staff. Since it cannot use this positive ID method fast enough to supply timber companies profits, it moves to justify cutting ALL FIR trees as 'susceptible'. In fact, it has so far done so waiving an acceptable Environmental Impact Statement (EIS) or producing a sham, inadequate, and shoddy EIS lacking a no-action or other alternatives; an full-range-of-options, acceptable EIS is the bog-level requirement for any action on the scale of this project.

I oppose the project because it would log most of the trees in the area using false rationales. In fact, their goal is primarily to commercially log and liquidate healthy trees.

There is also the misleading term "treat fuels" and "enhance hardwoods". A good reason for judicial thinning and planting. These nice goals do not here refer to the goal of reducing fuels alone; they are justifications and rationales for wholesale clear-cutting of all of the targeted fir species while making it sound like the agency is reducing deadfall or fire threat, when primarily it replaces fire-resistant disperse-species old-growth mixed species with logging slash and replanted monoculture seedlings of the same age.

Large and old trees signal, and offer, positive disease- and fire- resistant advantages to what the agency proposes to leave in place of what was once a fundamentally disease- and fire-resistant full ecosystem: disturbed soil, piles of strewn, then piled, infected dead slash and files of vulnerable seedlings all of the 'non-susceptible' species. Congratulations, lasting root rot and no intact mature ecosystem canopy and resilience left to fight it. You've just destroyed an American legacy in the name of nice-sounding goals and salvaged a lot of good timber for economic use! But the American families that value an old-growth forest won't live to see another one in its place at Walton Lake.

More proof of the radical departure of the agency from its policies are seen in that the agency must amend its own Forest Plan standards and guidelines in order to what would otherwise be violations; AKA BAD POLICIES. In fact, the project is only likely to disturb soils, root integrity and prominent recreation values to leave in its place unproven, un-sanitary plantations, and to top it all off it would be repellent, ugly and off-putting to the public. Does the agency propose to alienate the public from a prominent recreation site that the agency itself has advertised for "the best known location on the Ochoco National Forest due to the serene setting among old growth ponderosa pine and mountain meadows."

([https://www.fs.usda.gov/wps/portal/fsinternet/cs/recarea?ss=110607&navtype=BROWSEBYSUBJECT&cid=FSE\\_003738&navid=11024000000000&pnavid=11000000000000&recid=38766&actid=29&type=recarea&pname=Walton%20Lake%20Campground](https://www.fs.usda.gov/wps/portal/fsinternet/cs/recarea?ss=110607&navtype=BROWSEBYSUBJECT&cid=FSE_003738&navid=11024000000000&pnavid=11000000000000&recid=38766&actid=29&type=recarea&pname=Walton%20Lake%20Campground))

Further, the wildlife-supporting values, which are always also recreation values, would be destroyed for the lifetimes of visitors. The wildlife using the trees for habitat include pileated woodpeckers and northern flickers: there is ample researching showing that large trees are their best habitat and that lesser-diameters endanger them! During the present wildlife extinction crisis and consequent wildlife disease crisis, wild areas MUST be preserved as disease buffers and genetic refuges. a diverse and dense forest also offers optimal songbird cover; many of these are endangered by the habitat loss this misguided project would inflict on them. The public would see this agency damage over and over again and feel despair over the recent corruption and stupidity of the agency. Does the Forest Service want the public's wrath toward them? This is an election year and better administration guidance and field culture will be assessed for value to the voting public. When prominent, beloved campgrounds are destroyed for false justifications the year before, there will be an impulse for reform that will inflict upon the agency examinations of its larger plans and policies for wild lands.

Other animals visiting the area as feeding habitat include bears, elk, deer, the endangered marten and wolves. They also need cover to survive and this also is the mandate and priority of the agency to protect! Those who enjoy the the symbolism of larger animals in the wild NOT BEING endangered or extinguished in favor of human greed will vividly remember the loss of their favorite family campgrounds. This is a no-brainer as far as protection from logging: THAT IS WHY OLD GROWTH EXISTS THERE, it is testament to the good faith of the agency in the past that it has not been liquidated. When it is cut, the loss of that good faith from the agency will be exposed as a sham, a corruption, and reform will gather popular support from the public, to remove the corrupted agency officials and mandate wild lands protections over pretenses and pandering to the logging industry.