



VIA Electronic Submission:

<https://cara.ecosystem-management.org/Public//CommentInput?Project=49201>

April 12, 2018

Regional Forester
Attention 1570 OBJECTIONS
Pacific Northwest Region
P.O. Box 3623
Portland, Oregon 97208

Re: Mission Project, Okanogan-Wenatchee National Forest

Pursuant to 36 C.F.R. Part 218, the American Forest Resource Council (“AFRC”) files this objection to the proposed decision for the Mission Project. The responsible official is the Regional Objections Officer. The Mission Project occurs on the Okanogan-Wenatchee National Forest.

Objector

American Forest Resource Council
5100 SW Macadam, Suite 350
Portland, Oregon 97239
(503) 222-9505

AFRC is an Oregon nonprofit corporation that represents the forest products industry throughout Oregon, Washington, Idaho, Montana, and California. AFRC represents over 50 forest product businesses and forest landowners. AFRC’s mission is to advocate for sustained yield timber harvests on public timberlands throughout the West to enhance forest health and resistance to fire, insects, and disease. We do this by promoting active management to attain productive public forests, protect adjoining private forests, and assure community stability. We work to improve federal and state laws, regulations, policies and decisions regarding access to and management of public forest lands and protection of all forest lands. The Mission project will, if properly implemented, benefit AFRC’s members and help ensure a reliable supply of public timber in an area where the commodity is greatly needed.

Objector’s Designated Representative

Matt Comisky
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Olympia, WA 98501
360-352-3910

5100 S.W. Macadam Avenue, Suite 350
Portland, Oregon 97239
Tel. (503) 222-9505 • Fax (503) 222-3255

Reasons for the Objection

The content of this objection below is based upon the prior specific written comments submitted by AFRC for scoping on June 16, 2016 and February 17, 2017 in response to the draft EA which are hereby incorporated by reference. Many of the recommendations and requests for change in that document were not incorporated into the Draft Record of Decision, thus prompting this objection.

- 1. Treatment of Only a Portion of the Mission Project Area.** AFRC has commented twice regarding our disappointment that the Forest Service is only considering commercial harvest on 1,952 acres (3.9%) of the 50,200-acre project area. We believe there is more opportunity for treatments during this entry. In the project area, 60% of the land is designated as Matrix. Further, 10,979 acres (30% of the project area) is in Management Area 14-Matrix. The goal in MA-14 is intensive management for the timber and range resources using both even-aged and uneven-aged silvicultural practices.
- 2. The Forest is Not Adequately Addressing Forest Health Issues.** As stated in the planning document, MA25-19F specifies that stands with high level of dwarf mistletoe or root rot shall receive the highest priority for silvicultural treatment. In addition, there are 12,486 acres within Management Area 25 that have range and forest improvement as its goal. Despite this clear direction, the Forest is only planning to treat 3,566 acres in this category, most of which is non-commercial. To accomplish these goals, AFRC suggested that regeneration harvests could be carried out on these acres rather than thinning from below while leaving all trees 25" and larger. Regeneration harvests will not only reduce fuel loading and remove heavily diseased stands, it also will provide for early seral stages of vegetation that is needed for elk and deer herds in the area.
- 3. Not Adequately Treating LSR and Riparian Areas.** There are 2,445 acres of LSR that should be treated to promote the development of older stand characteristics. However, the Forest Service's proposal would only treat 116 of those acres. Riparian Areas make up 5,837 acres in the project area. Riparian areas were particularly devastated during the past series of wildfires and need treatment. AFRC strongly encouraged the Forest to significantly increase the acres to be commercially treated when developing the final project in these areas. This is not only the right thing to do for the Forest, but is also a more efficient use of the Forest Service's resources, which is consistent with the Chief's direction to increase *pace and scale* of forest management activities. It has also been documented that most of the wood that naturally recruits to streams comes from within the first 65 feet of the stream channel (Murphy and Koski, 1989; McDade et al. 1990. Johnson et al. 2011). If this is where the LWD is coming from then thinning in this region would likely accelerate its creation. Treatments also protect riparian stands from catastrophic wildfire loss, setting back LWD for decades. We encourage the Forest to design riparian thinning treatments on this project in ways that foster positive changes to large wood supplies that would result in measurable changes.

AFRC has not seen the Forest Service thin stands to minimum densities in LSR lands thus far on other projects on the Forest and, unfortunately, this trend looks as if it may continue in the Mission Restoration Project. Heavier thinnings will create better fuel breaks in case of wildfire, create better forage conditions for the northern spotted owl, and improve deer survival on their winter range. Additionally, this will greatly improve the economics of the project and provide more dollars for restoration activities. The Forest Service and Oregon State University are in the process of completing a 20-year study on the effects of a variety of thinning intensities implemented on the Siuslaw National Forest to achieve the type of structural diversity that you are trying to achieve in this project. This 20-year study found that individual tree growth was greater in the heavily thinned stands and that the abundance and diversity of understory increased with increased thinning intensity. Results also indicated that canopies closed at a relatively high rate following thinning.

4. AFRC Does Not Believe the Forest is Effectively Addressing Fuels Reduction Needs.

AFRC questions the effectiveness of your proposed fuels reduction efforts. The chart below shows the amount of crown fire risk that will remain once treatments have been completed. Sixty-one percent of the Buttermilk watershed and 34% of the Libby watershed will still be in either moderate or high risk to crown fires. This level of risk could be greatly reduced by doing more mechanical thinning across the landscape.

Low Crown Fire Risk

Buttermilk = 39% (increased 7%)

Libby = 65% (increased 12%)

Moderate Crown Fire Risk

Buttermilk = 23% (decreased 4%)

Libby = 21% (decreased 11%)

High Crown Fire Risk

Buttermilk = 38% (decreased 3%)

Libby = 14% (decreased 2%)

5. The Forest is Arbitrarily Limiting Harvest of Larger Trees Thus Reducing Needed Revenues for Restoration.

Harvest treatments call for leaving trees over 25" dbh. This criterion is not part of the Northwest Forest Plan and should not be part of this project. Many of the forest health problems identified such as dwarf mistletoe and Douglas-fir bark beetles require the larger "host" trees to be removed. AFRC recommended harvesting more of the larger trees to return more dollars for stumpage and for completing the restoration work that currently won't be funded to improve forest health. By arbitrarily limiting diameter of trees that may be removed, you are likely to need to thin unevenly in smaller stands to achieve fuels goals.

The two tables below show the value of the timber to be harvested compared to the amount of planned restoration work needed in the project. Receipts from timber sales will yield \$310,000 while restoration needs are \$2,110,000 under Alternative 2. The Forest should look at commercially treating more of the project area to increase the available funds for restoration.

Figure 5: Resource Indicators and Measures for the Proposed Action.

Resource Element	Resource Indicator (Quantify if possible)	Measure (Quantify if possible)	Proposed Action
Viability	Costs directly related to the Timber Sale	Dollars (in millions)	0.31

Cumulative Effects

There are no cumulative effects related to the financial aspects of the project since costs and benefits are shown over a multi-year basis.

Conclusion

It appears that this Timber Sale would be viable and have a moderate impact that could potentially contribute \$310,000 to Non-Timber Sale Projects.

Figure 2: Potential Non-Timber Sale Project Costs (in millions).

List of Non-Timber Sale Project Costs	Alternative 2	Alternative 3
Plantation Thin, Wetland Thin, and Post & Pole Thin	0.96	0.96
LFR Thin including machine piling	0.02	0.02
Road Closing/ Decommissioning Projects	0.35	0.58
Beaver Habitat Enhancement	0.01	0.01
Rock Armoring	NA	0.12
Culvert upsizing for non-fish passage	0.12	0.12
Culvert upsizing for fish passage	0.64	0.64
Coarse Woody Debris Enhancement	0.01	0.01
Total	2.11	2.46

6. The Forest Didn’t Adequately Assess Treating More Acres on Steeper Slopes.

AFRC recommended in our comments that in an effort to improve project economics, the use of tractor logging in as much of the project area as possible should be considered. Improvements in ground skidding techniques such as the ability to operate on steeper slopes with lower ground pressures make this mode of harvesting very economical and leaves a light footprint on the land. AFRC suggests requesting a site-specific Forest Plan Amendment for using ground-based equipment on slopes over 35%. We also suggest the soil scientists look at current studies where this type of equipment has been used and the damage to the resource is minimal. While a cursory study was done by looking at one project, and the results found were not satisfactory, the Forest should more thoroughly assess this option for specific areas within the Project area.

Resolution Requested

To resolve this objection, the following actions will need to occur.

1. Significantly increase the mechanical treatment acres in both matrix and LSR lands and increase thinnings in the riparian areas. This will support the existing forest products infrastructure and reduce wildfire risk in sensitive areas.
2. More stands with dwarf mistletoe and root rot disease need to be treated to accomplish the stated goals in the EA of improving forest health.
3. The Forest should use regeneration harvests in matrix lands rather than thinning from below.
4. The Forest should remove diameter limits on stands to be thinned. The Forest should thin to wider spacings in the LSR lands to accomplish silvicultural goals, improve wildlife habitat and reduce fuel loadings.
5. Treat more acres in the project to remove surface fuels in order to restore and maintain a resilient, fire-adapted ecosystem, and to provide for safe and effective wildfire response.
6. More acres and volume need to be harvested to collect receipts for the restoration work needed in the project area. The Mission project as currently planned will only yield about 15% of needed restoration funding.
7. Treat more acres on steeper ground for volume needs and for fuels reduction. The Forest should have analyzed the use of other logging methods to accomplish this goal.

Request for Resolution Meeting

Pursuant to 36 C.F.R. § 218.11, the objectors request a meeting with the reviewing officer to discuss the issues raised in this objection and potential resolution.

In the event multiple objections are filed on this decision, AFRC respectfully requests that the resolution meeting be held as soon as possible with all objectors present. AFRC believes that having all objectors together at one time, though perhaps making for a longer meeting, in the long run will be a more expeditious process to either resolve appeal issues or move the process along. As you know, 36 C.F.R. § 218.11 gives the Reviewing Officer considerable discretion as to the form of resolution meetings. With that in mind, AFRC requests to participate to the maximum extent practicable, and specifically requests to be able to comment on points made by other objectors in the course of the objection resolution meeting.

Thank you for your efforts on this project and your consideration of this objection. AFRC looks forward to our initial resolution meeting. Please contact our representative, Matt Comisky, at the address and phone number shown above, to arrange a date for the resolution meeting.

Sincerely,



Travis Joseph
President