



Via email: [objections-pnw-regional-office@fs.fed.us](mailto:objections-pnw-regional-office@fs.fed.us)

September 3, 2019

Regional Forester  
Objection Reviewing Officer, Pacific Northwest Region  
USDA Forest Service  
Attn. 1570 Objections  
PO Box 3623  
Portland, OR 97208-3623

Re: Black Mountain Vegetation Management Project Objection

Dear Objection Reviewing Officer:

Pursuant to 36 C.F.R. Part 218, the American Forest Resource Council (AFRC) files this objection to the proposed decision for Black Mountain Vegetation Management Project (Black Mountain). The responsible official is Shane Jeffries, Forest Supervisor. Black Mountain occurs on the Paulina District in Crook and Wheeler Counties on the Ochoco National Forest (ONF).

**Objector**

American Forest Resource Council  
700 N.E. Multnomah, Suite 320  
Portland, Oregon 97232  
(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 Black Mountain 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

Irene Jerome

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

## Reasons for the Objection

The content of this objection below is based upon AFRC's previously submitted specific written comments regarding the proposed project that AFRC provided during scoping and in response to the draft EA which are hereby incorporated by reference.

AFRC provides the following specific descriptions of those aspects of the proposed project addressed by its objection, its issues with the project, and its suggested remedies that would resolve the objection:

- 1. Failure to incorporate the need for economic viability and support for local forest products infrastructure into the purpose and need.** AFRC gave prior specific written comments on the proposed project that relate to this objection point in the scoping, comments letter dated May 12, 2017 and EIS comments dated January 28, 2019. AFRC objects to the failure to add **economic viability and support to the local infrastructure** to the Black Mountain purpose and need. AFRC requested during scoping that the ONF modify the purpose and need by adding **"economic viability & support to the local infrastructure."** Supporting local industry and providing useful raw materials to maintain a robust manufacturing sector should be a principal objective of any project proposed on NFS lands. In the Black Mountain Draft Environmental Assessment (DEA) the purpose and need is presented on page 5. The purpose and need has not been modified to include **"economic viability & support to the local infrastructure."** Maintaining the forest products industry and providing raw materials to the local infrastructure should be a primary driver of the purpose and be identified as a critical "need," on any project that removes commercial material regardless of the primary purpose. The forest products industry provides both the vehicle and many of the funds to help reduce the fuels in wildland urban interface areas as well as providing essential support to local economies. Milling and processing infrastructure costs millions of dollars and is very difficult to get back once it is lost. The ONF must better recognize the importance of the local forest products infrastructure by emphasizing the role industry plays in fuels reduction and potential removal to provide some economic return.
- 2. Requirement for diameter limits.** AFRC objects to any type of arbitrary diameter limits for any species including juniper, grand fir, Douglas-fir and ponderosa pine. Resource professionals must have the latitude to make site specific decisions on the ground in order to adequately meet the purpose and need of the project. The following statement occurs on page 7 of the DEIS: "Based on the results of additional field analysis, updated LiDAR and GIS mapping information, and comments and recommendations received from the public, several modifications have been made to the proposed action

since it was scoped in 2017. Notable modifications include removal of harvest of young trees >21 inches in diameter and the associated Forest Plan amendment.” Leaving out the selective harvest of greater than 21” shade tolerant trees in specific circumstances where they imperil old legacy pine trees does not meet the Black Mountain purpose and need to move the existing condition of these areas toward historic conditions in dry forests in the project area (historic range of variability) and does not follow best available science regarding dry forest restoration. Further, leaving grand fir in these stands, regardless of where it is located, retains the seed source and ensures that this species will continue to re-establish in the understory.

3. **Reduction in Commercial Thinning Acres.** AFRC categorically objects to any reduction of commercial thinning acres in these projects. In a description of the modifications to the initial proposed action page 7 of the DEIS states “Minor modifications include reduction of acres of commercial thinning;” specifically, the Black Mountain planning area contains 29,299 acres of General Forest as defined by the Ochoco Land and Resource Management Plan (LRMP) as areas that “are managed to produce timber and forage while meeting the Forest-wide standards and guidelines for all resources. In ponderosa pine stands, management will emphasize production of high value (quality) timber.” Originally, Alternative 2 proposed to implement commercial thinning on 4,645 acres with an additional 442 acres of commercial removal of excess trees in riparian areas. The Black Mountain planning area is 34,013 acres so commercial thinning would have been implemented on approximately 15 percent of the planning area. This is not acceptable.
4. **RHCA Treatments.** AFRC objects to the elimination of commercial treatments in the RHCA.
5. **Roads.** AFRC objects to permanent road decommissioning where the future access benefits of the road outweigh the potential resource risk. Road infrastructure is extremely important, and expensive to construct. It may be necessary to utilize these roads again in the future. With the roadbed already in place the costs of re-opening are reduced. Seasonal closures or other measures to close roads that are utilized rather than “decommissioning” should be considered if possible. Furthermore, we would like the Forest Service to provide clear rationale as to why certain roads are proposed for decommissioning. This rationale should include an explanation as to how the Forest determined that the potential resource risk of the road in question outweighs the future access needs that the road provides. This access includes not only vegetation management but also fire suppression and recreation.

## **Resolution Requested**

AFRC requests that the ONF modify the Black Mountain proposed action by: 1) revising the purpose and need to clearly articulate the critical nature of retaining the current forest industry infrastructure by adding “**economic viability & support to the local infrastructure**” to the purpose and need of the project, 2) by removing all diameter limits, 3) by including the

442 acres of commercial thinning as originally proposed in Alternative 2 and 4) by eliminating any permanent road decommissioning.

### **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 objection 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 the Black Mountain project and for your consideration of this objection. AFRC looks forward to our initial resolution meeting. Please contact our representative, Irene Jerome, at the address and phone number shown above, to arrange a date for the resolution meeting.

Sincerely,

A handwritten signature in black ink, appearing to read "Travis Joseph". The signature is written in a cursive, flowing style with a large initial "T".

Travis Joseph  
President