



**VIA Email:** objections-pnw-colville@usda.gov

September 18, 2019

Forest Supervisor  
Objection Reviewing Officer  
Colville National Forest Supervisor's Office  
Attn: Objections  
765 South Main  
Colville, WA 99114

Re: Boulder Park Ecological Restoration Project

Pursuant to 36 C.F.R. Part 218, the American Forest Resource Council ("AFRC") files this objection to the proposed decision for Boulder Park Ecological Restoration Project. The responsible official is Rodney Smoldon, Forest Supervisor. The Boulder Park Ecological Restoration Project occurs on the Colville National Forest.

**Objector**

American Forest Resource Council  
700 NE Multnomah St., 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 Boulder Park Ecological Restoration 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**

Tom Partin

[REDACTED]

[REDACTED]

503-704-4644  
[tpartin@amforest.org](mailto:tpartin@amforest.org)

### **Reasons for the Objection**

The content of this objection below is based upon the prior specific written comments submitted by AFRC. We provided written input during the scoping period on May 11, 2018 and again during the Draft EA comment period on April 9, 2019. AFRC appreciates and supports many aspects of the Draft Decision Notice, however, not all of our input has been included or analyzed in the final Plan. AFRC has been actively involved in the NEPA process on this project since its inception and would like to continue this involvement through the project's implementation. Included in this process is the objection resolution phase and since the Decision is only a draft, potential exists for project design modifications to be made prior to a final Decision Notice.

- 1) AFRC supported the action for mechanically treating 10,000-12,000 acres within the 26,247 acres of Forest Service lands that was outlined in the scoping document. Our comment was actually “AFRC supports treating the largest footprint of at least 12,000 acres to improve forest health, reduce wildfire risk, enhance water quality and quantity, and to improve the other resources listed above.” Unfortunately, the proposed action now calls for only mechanically treating 9,010 acres.**

In the Draft EA, AFRC encouraged the Forest to maximize the commercial volume being removed from these 26,247 acres. We pointed out that for every one million board feet of timber harvested approximately 12 jobs are created. Several milling facilities have left communities surrounding the Colville National Forest in recent years due to the lack of adequate log supply including the sawmill in Republic. Further, the sawmill in Usk has been working at reduced shifts and this project could help that facility build to two shifts. It should be noted that projects like Boulder Park Ecological Restoration Project could help maintain the existing milling facilities that depend on wood from the Forest and will also help support the existing logging infrastructure.

AFRC has several members that depend on timber from the Colville National Forest for their resource needs. The timber products provided by the Forest Service are crucial to the health of our membership within this operating area. Without the raw material sold by the Forest Service these mills would be unable to produce the amount of wood products that the citizens of this country demand. Without this material, our members would also be unable to run their mills at capacities that keep their employees working, which is crucial to the health of the communities that they operate in.

- 2) The Forest opted to use group selection on only 50 acres to remove all trees in groups up to five acres in size. AFRC believes the Forest has missed an opportunity to further improve forest health by reestablishing healthy stands and to provide much needed early seral habitat for big game species.**

In our Draft EA comments, we suggested a broader use of this harvest method in order to create early seral habit for big game species such as deer and elk. The Forest has an

abundance of cover, but lacking forage, this system could help with creating more forage. AFRC encouraged the Forest to treat more acres using the group selection method.

**3) AFRC supports the road plan of reducing the amount of system roads in the project area by 14 miles. However, we are very concerned that a total of 25 miles of road will be decommissioned. (See chart below)**

**Table 3. Proposed road and trail management activities designed to move toward a more sustainable road system and improve watershed condition**

Proposed Road Work	Length (miles)	Description
Build new system roads	11	Roads constructed for project activities would be closed and hydrologically stabilized for future land management activities. Roads would be closed using a variety of methods (e.g., gating, berthing, rock placement).
Build new temporary roads and restore the area after use.	13	Construct temporary roads to access project activities. Restore the area after project activities are complete using any or all of the following actions <ul style="list-style-type: none"> <li>• recontouring the existing road bed to match the adjacent topography,</li> <li>• removing culverts or other stream channel crossing structures,</li> <li>• seeding or planting trees or both,</li> <li>• soil decompaction, and</li> <li>• placement of down woody material or rocks</li> </ul>
Close existing open roads	12	Close to public (motorized) use with gates or other means. For those roads which access NFS lands only, replace gates with earthen berms / boulders installed on the road entrance, post-project. This action would reduce the high road densities in the project area, thereby reducing road maintenance costs and improving seclusion for big game and other wildlife.
Decommission existing roads	25	Remove from the National Forest System 22 miles of roads currently closed and 3 miles currently open using the same methods as described above under build new temporary roads.
Net change in <b>open</b> road miles	-14	Change in forest system road miles open for highway-legal vehicle use.

AFRC asked the Forest to look at closing more roads than the 12 miles currently planned rather than decommissioning the roads. Closing roads is much cheaper because it uses gates or other means. For those roads which access NFS lands only, replace gates with earthen berms/boulders installed on the road entrance. By using this technique, it allows for a road to be used at a later time for land management, fire access or recreation. Decommissioning roads requires recontouring of the road prism, soil decompaction, and placement of down woody material or rocks which is very expensive.

Further, AFRC pointed out that there is a huge opportunity to use retained receipts or K-V funds from the harvest of timber from this project to improve many of the other resources that have been mentioned including the installation of new culverts or possible road relocation to prevent potential road failures or stream sedimentation. There will be a need for thousands of acres of precommercial thinnings, prescribed burnings, and other treatments as

well that could be funded by these timber receipts. AFRC does not think these receipts should be heavily weighted to road decommissioning.

### **Resolution Requested**

- 1) AFRC requests that the Forest reanalyze ALL potential areas that can and need to be treated. We do not believe the Forest has done an adequate job of detailing why the treatment acres have dropped from a possible high of 12,000 acres down to 9,010 acres. By removing nearly 3,000 acres of possible harvest, we feel the Forest has lost an opportunity for improving forest health and reducing the threat of wildfire, sawmills in the area have lost a potential source for raw materials, and surrounding communities and counties will face a potential employment reduction.
- 2) AFRC requests the Forest reanalyze and broaden the use of group selection in this project. AFRC believes the Forest has missed an opportunity to further improve forest health by reestablishing healthy stands and to provide much needed early seral habitat for big game species.
- 3) AFRC asked the Forest to consider closing more roads rather than decommissioning roads. Closing roads is much cheaper than decommissioning roads, and AFRC believes the potential costs for decommissioning can be better spent on improving other resources.

### **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, Tom Partin, at the address and phone number shown above, to arrange a date for the resolution meeting.

Sincerely,



Travis Joseph  
President