



Via: <https://www.fs.usda.gov/project/?project=49749>

October 4, 2019

Tom Montoya
Wallowa Whitman Forest Supervisor
1550 Dewey Ave
Baker City, OR 97814

Re: Two Eagle 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 Two Eagle Vegetation Management Project (Two Eagle). The responsible official is Bill Gamble, District Ranger. Two Eagle occurs on the La Grande District in Baker County on the Wallowa Whitman National Forest (WWNF).

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 Two Eagle 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
408 SE Hillcrest Rd
John Day, OR 97845
(541) 620-4466
ijerome@amforest.org

Reasons for the Objection

The content of this objection below is based upon AFRC's previously submitted 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. Requirement for diameter limits

AFRC objects to any type of arbitrary diameter limits for any species 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. Leaving out the selective harvest of greater than 21" shade tolerant trees in specific circumstances such as where they imperil old legacy western larch, Douglas-fir and ponderosa pine trees does not meet the Two Eagle purpose and need to move the existing condition of these areas toward historic conditions in dry forests and cool moist forests in the project area (historic range of variability) and does not follow best available science regarding dry and moist 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. While there may be a deficit of "large" trees across the landscape, leaving these grand fir trees in stands where they jeopardize present and future legacy trees defeats the purpose.

2. Reduction in Commercial Thinning Acres

AFRC categorically objects to any reduction of commercial thinning acres in these projects.

3. RHCA Treatments

AFRC objects to the lack of commercial treatments in the RHCAs. The complete prohibition of "commercial" logging in RHCAs is arbitrary and limits resource professionals' ability to utilize best available science and best management practices on the ground.

4. 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. Future access needs include not only vegetation management but also fire suppression and recreation.

Resolution Requested

AFRC requests that the WWNF modify the Two Eagle proposed action by: 1) removing all diameter limits to allow for adequately meeting the purpose and need, 2) maintaining the acres of commercial thinning as proposed in Alternative 2 Modified, 3) including commercial harvest in RHCAs and 4) providing viable alternatives to 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 Two Eagle 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 stylized with a cursive script.

Travis Joseph
President