



December 18, 2019

Forest Supervisor  
Objection Reviewing Officer  
Okanogan-Wenatchee National Forest  
Attn: Appeals and Objection  
215 Melody Lane  
Wenatchee, Washington 98801

Re: Little Crow Restoration Project

Pursuant to 36 C.F.R. Part 218, the American Forest Resource Council (AFRC) files this objection to the proposed decision for Little Crow Restoration Project. The responsible official is Forest Supervisor Kristin Bail. The Little Crow Restoration project occurs on the Okanogan-Wenatchee National Forest.

**Objector**

American Forest Resource Council  
700 NE Multnomah, Suite 320  
Portland, OR 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 Little Crow 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]  
[REDACTED]  
[REDACTED]

## 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 December 6, 2016, and again during the combined scoping and comment period with the proposed Northwest Forest Plan amendment on November 28, 2018. AFRC appreciates and supports many aspects of the Decision Notice & Finding of No Significant Impact for the Little Crow Restoration Project, however, not all of our input has been included or analyzed in the final Environmental Assessment. 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 Notice is only a draft, potential exists for project design modifications to be made prior to a final Decision Notice.

- 1) As we pointed out in both of our previous comment, many of the stands in the project area are at risk of uncharacteristically large wildfires and attack from insects and disease. AFRC suggested that the Forest should commercially treat as many acres as possible within the 56,936-acre project area to fireproof these stands and make them more resilient to insect and disease outbreaks. Also, AFRC believes that more work could be done to enhance the habitat for the northern spotted owl (NSO), white-headed woodpecker, three-toed woodpecker and black-backed woodpecker. For example, Table 2-2 in the combined scoping and comment period with the proposed Northwest Forest Plan amendment lists the maximum potential commercial treatable acres to enhance large and old growth development is 10,081 acres, however the proposed action is planning to treat 6,500 acres. For the northern spotted owl, there is the potential to treat and enhance 6,317 acres. The same opportunities for additional treatment acres apply to other species enhancement. Yet in the Final Decision (Alternative 3), only 9,030 acres are planned for commercial harvest.

Over the past several years many Forest Service projects have been scaled back in scope to a reduced level of treatment acres due to perceived effects to the NSO, including thinning treatments designed to improve owl habitat. In our comments we encouraged the Okanogan-Wenatchee National Forest to consider a recently published study conducted by NCASI when assessing treatment areas and their potential affects to owls.

*Larry L. Irwin, Dennis F. Rock, Suzanne C. Rock, Craig Loehle, Paul Van Deusen. 2015. Forest ecosystem restoration: Initial response of spotted owls to partial harvesting*

Among other findings, this study concluded that partial-harvest forestry, primarily commercial thinning, has the potential to improve foraging habitats for spotted owls. The treatments being proposed will likely affect NSO habitat to some degree. Often this level of effect is quantified by the amount of forest canopy that remains following thinning treatments. AFRC has general concerns with how the Forest has been measuring these effects to NSO habitat, specifically regarding canopy cover/closure. AFRC previously submitted the document titled 'NSO Canopy Condition' as an addendum to these

comments for consideration in how the treatments on this project are designed and how this design affects the NSO. We again urge you to review that study.

- 2) AFRC asked that one final assessment be given before the final decision to decommission 32 miles of system road is made. The Forest has invested millions of dollars in its road system and AFRC would prefer to see roads closed by gating or by berms rather than by decommissioning or obliteration. If access is needed in the future for fire, or harvest, those roads could be reactivated. AFRC believes that in many cases only earthen barriers, gates, or waterbars will be needed to provide desired results without the expensive re-contouring measures.
- 3) AFRC requested that the economics section of the project analysis could be strengthened by highlighting the importance of maintaining the local logging and milling infrastructure which will actually be implementing treatments on the ground. The volume of timber removed from this project will create many jobs in rural communities within the bounds of the Okanogan-Wenatchee National Forest and outside of the Forest's boundaries. For every million board feet of timber harvested approximately 12 jobs are created. Several milling facilities have left communities surrounding the Okanogan-Wenatchee National Forest in recent years due to lack of adequate log supply. It should be noted that projects like the Little Crow will help maintain those milling facilities still in place that depend on wood from the Forest and will also help support the existing logging infrastructure.
- 4) AFRC suggested that in those areas being treated for fire resiliency and for enhancement of large and old tree development that thinning be conducted to significantly reduce the basal area in the stands thus reducing crown closure. Since this project area will probably not be entered for at least another two decades, the stands should be thinned to a spacing that will provide for maximum growth and forest health for that time period. We see no commitment in the Final Record of Decision that this will be accomplished. We remain very concerned that heavy stand densities will remain after harvest since the same criteria as listed below was used in the harvesting criteria for the Huck Sale which was initially in the Little Crow Project and underran significantly. The Huck project not only did not remove the needed volume per acre, it underran in volume by nearly 50 percent.

*“Commercial treatments within the Little Crow project area will remove trees greater than seven inches diameter breast height (DBH) and no greater than 25 inches DBH; no greater than 20 inches DBH in Late Successional Reserve (LSR) and Managed Late Successional Area (MLSA). Commercial harvest methods are intended to enhance the development of old and large trees and accelerate the development of late successional and old growth forest ecosystems. Commercial harvest methods may include variable density thinning, free thinning, group selection cutting, shelterwood or seed tree, or reserve cutting”*

### **Resolution Requested**

- 1) AFRC requests that the Forest should commercially treat more acres within the 56,936-acre project area to fireproof these stands and make them more resilient to insect and disease outbreaks. This would be substantially more than the current proposal of 9,030

acres for commercial harvest. AFRC believes that more work could be done to enhance habitat for the northern spotted owl, white-headed woodpecker, three-toed woodpecker and black-backed woodpecker with these treatments.

- 2) AFRC requests the Forest consider shifting proposed road decommissioning mileage to road closure mileage by using earthen barriers, gates, and waterbars rather than requiring expensive re-contouring measures.
- 3) AFRC requests the Forest include a discussion of the economic importance of maintaining the local logging and milling infrastructure which will implement treatments on the ground. The volume of timber removed from this project will create many jobs in rural communities within the bounds of the Okanogan-Wenatchee National Forest and outside of the Forest's boundaries.
- 4) AFRC requests that thinning in those areas being treated for fire resiliency and for enhancement of large and old tree development be conducted in a manner that will significantly reduce the stand basal area and crown closure.

#### **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,

A handwritten signature in black ink, appearing to read "Travis Joseph". The signature is stylized with a large, sweeping "T" and a cursive "Joseph".

Travis Joseph  
President