



VIA email submission: objections-pnw-mthood@usda.gov

July 10, 2020

Richard Periman, Forest Supervisor
Mt. Hood National Forest
16400 Champion Way
Sandy, OR 97055

RE: Waucoma Huckleberry Enhancement Environmental Assessment Statement Objection

Pursuant to 36 C.F.R. § 218.8, the American Forest Resource Council files this objection to the proposed draft decision for the Waucoma Huckleberry Enhancement Environmental Assessment. Hood River District Ranger Kameron Sam is the responsible official. The Waucoma Huckleberry Project is located on the Hood River Ranger District on the Mt. Hood National Forest.

Objector

American Forest Resource Council
700 NE Multnomah
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 Waucoma Huckleberry Enhancement 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

Andy Geissler, Federal Timber Program Director
2300 Oakmont Way; Suite 205
Eugene, OR 97401
541-342-1892

ageissler@amforest.org

Reasons for the Objection

The content of this objection below is based upon the prior specific written comments submitted by AFRC in response to the scoping comment solicitation which are hereby incorporated by reference.

The decision to defer density management treatments in riparian reserves adjacent to shelterwood units will diminish the scale of attainment of the resource objectives that are identified in the Purpose & Need.

The Purpose & Need as it appears in the Final EA includes the following:

“Create and maintain current and future huckleberry habitat across the landscape to benefit stand conditions”

The primary objective specific to land designated as riparian reserve is to:

“Improve understory species composition, enhance structural diversity, and improve future quality of downed wood and in-stream large wood.”

We believe that the goal of any Forest Service vegetation management project should be to meet the stated project objectives to the **maximum extent** across as many acres of the project area as possible. The scope, measured in acres treated for this project, should be the metric that indicates how well the Forest Service is meeting its stated objectives on any given project. In other words, meeting the stated Purpose & Need on 500 acres is inferior to meeting the stated Purpose & Need on 600 acres.

In our scoping comments, we urged the Forest Service to actively manage forest stands in riparian reserves where such management would address the stated objectives for those reserves. In those comments we stated that: *“Recent large wildfires have shown that some of the most severe burns and resource damage have occurred in the riparian areas where the fuel loads are the highest. Creating openings in riparian areas also allows more sunlight to enter which can enhance huckleberry growth and other vegetation and insect production for a variety of species that depend on them for food.”* In those comments we also provided the District with several pieces of relevant scientific literature that identify the benefits to actively managing riparian reserves with variable density thinning treatments.

The Waucoma Huckleberry EA recognizes the benefits of thinning treatments as they relate to the objectives identified for riparian reserves. Page 7 states that *“thinning can have both immediate effects on forest diversity and long-term effects restoring native plant communities.”* The EA also recognizes the benefits that such treatments could have on the project Purpose & Need of huckleberry enhancement: *“structural diversity would be improved directly by initiating*

a new age class and by creating opening which can support understory species diversity and huckleberry growth.”

To address those objectives the project considers active thinning treatments (variable density thinning and intermediate thinning) on 129 acres of riparian reserves to meet the project Purpose & Need and objectives for riparian reserves. This footprint could have been larger had the Forest Service considered treatment on all riparian reserves in need. However, page 9-10 of the EA states that the proposed action was modified in response to feedback during the scoping period. One modification included the deferral of treatment in riparian reserves *“where they are directly adjacent to shelterwood treatment areas.”*

The EA does not elaborate on the rationale for this deferral. Rather, the EA contains analysis that is counter to this deferral and supports the benefits associated with thinning in riparian reserves. The analysis beginning on page 22 of the EA describes impacts of riparian thinning on water quality to be “marginally detectable,” on riparian function and channel stability to be “unimpaired,” and on fish species to be “negligible.” Page 28 considers the impacts to riparian function specifically related to shelterwood treatments. Here, the EA states that *“since the extent of shelterwood treatments would be small at this scale, their potential effect on runoff and peak flows would also be considered nominal.”* Given this analysis, the decision to defer riparian reserve treatments adjacent to shelterwood units seems to conflict with attainment of the Purpose & Need and riparian reserve objectives.

Following publication of the EA, we made field visits to the proposed treatments units to review stand conditions on those units where treatment is proposed as well as those units where treatment is not proposed. The photograph below was taken in one of those deferred riparian reserve stands adjacent to shelterwood units; specifically, the riparian reserve that transects unit 57.



As this photo indicates, this stand is at a density level, species diversity level, and structural diversity level that is generally considered undesirable for riparian forest stands. Such a condition warrants thinning treatments based on the analysis in the EA, the current scientific literature, and the project Purpose & Need.

Resolution Requested

AFRC requests that the Deciding Official expand the proposed treatments in riparian reserves to include those stands in need of treatment adjacent to shelterwood units. If such an expansion is deemed to be inconsistent with the project purpose and need or likely to result in unacceptable resource damage, we request that those inconsistencies and/or resource risks be outlined. Currently, as the EA is written, we can only surmise that the decision to make this deferral was based solely on public feedback during the scoping period.

Request for Resolution Meeting

Pursuant to 36 C.F.R. § 218.11, the objectors request to meet 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 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, Andy Geissler, 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.

Travis Joseph
President