



Submitted VIA ONF Website Project Comment Form

November 9, 2020

Kelly Lawrence, Forest Supervisor
Olympic National Forest
1835 Black Lake Blvd SW
Olympia, WA 98512

RE: OBJECTION Wynoochee Restoration and Road Management Project

Pursuant to 36 C.F.R. Part 218.7, the American Forest Resource Council files this objection to the proposed draft decision for the Wynoochee Restoration and Road Management Project. Hood Canal District Ranger Yewah Lau is the responsible official. The Wynoochee Restoration and Road Management Project occurs on the Hood Canal Ranger District on the Olympic National Forest.

Objector

American Forest Resource Council
700 NE 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 Wynoochee Restoration and Road Management 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

Matt Comisky, Washington Manager
921 Capitol Way S, Suite 102
Olympia, WA 98501
360-325-3910
mcomisky@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 Notice which are hereby incorporated by reference.

The proposed Alternative (“modified” Alt B.) fails to fully address the current and future access needs in the project area to meet two of Purpose and Need statements.

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

“Increase structural and habitat diversity and accelerate the development of late-successional forest characteristics by reducing the density of trees in second-growth stands in Late Successional Reserve (LSR) and Adaptive Management Area (AMA) land allocations.”

“Contribute to the economic viability of local communities.”

In AFRC’s opinion, 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. And this includes considering future needs to continue to meet the goals of the Purpose and Need, specifically, the goal of *“a sustainable level of forest products for local and regional economies and to provide jobs.”* The use of the term “sustainable” implies assuring activities today do not foreclose on future need and opportunities to support these *“local and regional economies.”*

In our Scoping comments, we expressed concern regarding the scope of the proposed road decommissioning and how that can impact both current project viability as well as future opportunities. As we mentioned in our comments; *“the AMA allocation is the sole opportunity for long-term sustainability for logging and milling infrastructure as well as timber dependent communities”* on the Olympic National Forest. Additionally, we identified concerns with recreation impact due to road decommissioning in our comments and how that *“will focus this recreation traffic onto a smaller footprint of the planning area. This densification of use will increase maintenance costs over time and more trips are conducted on a given mile of road, thus requiring additional road maintenance work.”* Coupled with loss of access to rock sources located on National Forest lands in the project area risks causing significant increases in road maintenance costs and risks future economic viability of vegetation and recreation management projects in the future.

We continue to firmly believe that continued *“reduction in access for vegetation management and recreation will serve to harm the local communities who depend on both timber management and recreation to support their economies.”* And road decommissioning will foreclose on future access needs for management to assure that stands continue *“increase structural and habitat diversity”* and that the full intent of AMA land allocations can be utilized today and into the future.

Ultimately, we believe that minimizing the miles of decommissioning in the Draft Decision Notice is the only way to best meet the Purpose and Need and to maximize its attainment, particularly the portion of the Purpose and Need that addresses the need for the sustainable support of local economies and jobs.

Resolution Requested

AFRC requests that the Deciding Official build upon the modifications to road decommissioning already included in the proposed “modified Alternative B” and expand the use of ML 1 roads in place of decommissioning. Additionally, to address the concerns over loss of recreational access (which has current and future timber management implications) we ask the Forest to explore opportunities to maintain the upper loop portion of the 2270 in a ML 2 state and remove the conversion to trail of the 2270-400 and leave it in a ML 1 status. The use of ML 1 status does not foreclose future needs, can address most if not all resource concerns, and in the case of overgrown roads minimizes the significant risk of reopening vegetated roadways to weather exposure.

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, Matt Comisky, 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".

Travis Joseph
President