



April 23, 2021

Reviewing Officer
Craig Trulock, Forest Supervisor
Malheur National Forest
Attn: 1570 Appeals and Objections
PO Box 909
John Day, Oregon 97845

RE: Crow Hazardous Fuel Reduction Project

VIA email: objections-pnw-malheur@usda.gov

Pursuant to 36 C.F.R. Part 218.7, the American Forest Resource Council files this objection to the proposed draft decision for the Crow Hazardous Fuels Reduction Project (Crow). Emigrant District Ranger Joshua Giles is the responsible official. The Crow project occurs on the Snow Mountain Ranger District administratively managed by the Emigrant Ranger District on the Malheur 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 Crow 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, AFRC Consultant

408 SE Hillcrest Rd

John Day, OR 97845

(541) 620-4466

ijerome@amforest.org

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

- 1. When compared to the Proposed Alternative, Alternative 3 fails to adequately meet the Purpose and Need of the project and incorporation of any of its elements would retard the agency's ability to meet those objectives to their fullest extent.**

The Purpose & Need as it appears in the Crow scoping document includes the following:

Reduce hazardous fuel loadings (including surface fuels, ladder fuels, and crown fuels) to alter fire behavior (intensity, duration, rate of spread, torching, and crowning) and move the area towards conditions that will allow fire to play a more frequent and natural role on the landscape while exhibiting historical fire effects (mixed severity) from burning at low to moderate intensities during planned and unplanned ignitions.

Salvage harvest recently killed trees that are surplus to other resource needs in order to reduce hazardous fuels and capture the economic value of those dead trees.

In AFRC's opinion, the goal of any Forest Service vegetation management or fuels reduction 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 types of silviculture treatments should be the metric that indicates how well the Forest Service is meeting its stated objectives on any given project. The Environmental Analysis (EA) indicates that Alternative 3 meets the Purpose & Need of the Crow project to a lesser degree and magnitude than the Proposed Action.

Ultimately, the Forest Service's EA indicates that full implementation of the Proposed Action presented in the scoping document best meets the Purpose and Need to reduce hazardous fuel loadings, to alter fire behavior, and to move the area towards conditions that will allow fire to play a more frequent and natural role on the landscape, as well as to salvage harvest recently killed to reduce hazardous fuels and capture the economic value of those dead trees. The

recently signed Forest Management Direction for Large Diameter Trees in Eastern Oregon changes the requirement to leave 21” DBH trees from a **standard** to a **guideline** thereby allowing the eastside Forests to utilize best available science on projects. In our scoping comments, we stated that “We applaud the Emigrant Creek District for using the best available science as applied to site specific on the ground conditions in developing and proposing silviculture treatments in the Crow planning area. This includes commercial thinning up to 30 inches dbh.” Instead of heeding this recommendation and the results of your own EA and selecting the alternative that best meets the purpose and need, the District selected an inferior alternative and justified that selection with the following statement on page 6 of the Crow Draft Decision Notice: *“I also evaluated the proposed action, which was developed through the collaborative process. While this alternative would meet the purpose and need slightly better than the selected alternative (Crow Vegetation Report), the risk to the project as a whole from cutting large trees is too excessive. The timing of this project related to the recently signed Forest Management Direction for Large Diameter Trees in Eastern Oregon and likely pending litigation makes the preferred alternative the most likely alternative to be implemented in a timely manner.”*

AFRC is extremely disappointed that projects developed collaboratively to reduce hazardous fuels loading are being degraded due to “likely pending litigation” on a rule that received broad support from a diverse set of stakeholders. It is a shame that the Forest Service is prioritizing the appeasement of extremist special interest groups over the proper mitigation of fire risk to local communities and local forests.

Resolution Requested

AFRC requests that the Deciding Official select the Proposed Action as described in the Crow Scoping document.

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, 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 written in a cursive, flowing style with a large initial "T".

Travis Joseph
President