



VIA: <https://www.fs.usda.gov/project/?project=55477>

December 17, 2021

Shaun McKinney, Forest Supervisor
Wallowa Whitman National Forest
ATTN: Objections, Patrick Project
1550 Dewey Ave, Suite A
Baker City, OR 97814

RE: Patrick Vegetation Management Project Objection

Pursuant to 36 C.F.R. Part 218.8, the American Forest Resource Council files this objection to the proposed draft decision for the Patrick Vegetation Management Project (Patrick). Kendall Cikanek, District Ranger, is the responsible official. The Patrick project occurs on the Whitman District on the Wallowa-Whitman 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 Patrick 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. The Proposed Alternative, Alternative 2 fails to adequately meet the Purpose and Need of the project.

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

“... the purpose and need for action is generated by conditions within the analysis area, which have departed from the historic range of variability (HRV), creating conditions that have an increased vulnerability to uncharacteristic levels of disturbance severity. HRV represents the expected range of tree species, tree density and forest structure under natural, unmanaged disturbance patterns. An analysis of existing vegetation indicates these forest characteristics have shifted away from HRV over the past few decades. Fire exclusion and historic harvest methods which removed high value trees are likely major contributors to this shift away from HRV.” (Draft EA p.11). 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. Large young grand firs are not “high value trees.” Treatments should not be limited by arbitrary restrictions that are not components of your Land and Resource Management Plan and are not supported by the best available science including “*leaving all trees equal to or greater than 21 inches dbh.*” We are unclear where such an arbitrary restriction as “21-inches” comes from—it is not in your Resource Management Plans and it is not prevalent in any recent scientific literature. Forest Service professionals need the ability to make site specific decisions on the ground which may include occasional removal of trees greater than 21” dbh.

As you are aware, the U.S. Forest Service recently amended Forest Plans for eastside Forests adhering to the Eastside Screens. In the Final Decision for that Amendment, the agency determined that “Scientific research and over 20 years of on-the-ground experience implementing the 21-inch standard demonstrate a need to change policy to better adapt forest conditions to current disturbance regimes and expected climate-induced changes including longer fire seasons, larger areas burned and increased risk of insect and disease mortality.” Rather than following 20 years of scientific research and adhering to your current Forest Plan, the Wallowa-Whitman National Forest has constrained themselves with an out of date parameter that is not based on science or empirical evidence or plan direction on the Patrick project. Not only is there no scientific justification for applying a 21” dbh limitation, there is also no Management Plan Direction. It is extremely disappointing that the Wallowa-Whitman is going backwards by using this arbitrary dbh limit established over a quarter century ago.

Ultimately, we believe that implementation of the proposed acres in the Draft Decision Notice, without the constraints of a diameter limit, 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 age-class diversity and long-term wood products, and that incorporation of a diameter limit would inhibit this attainment.

2. Skyline logging system requirements may not be implementable.

AFRC clearly articulated in our scoping comments that rigid requirements for skyline/cable yarding systems may not be feasible. Line loggers are virtually non-existent in eastern Oregon and west central Idaho at this time. Flexibility in systems for removal of volume on steeper slopes is paramount. AFRC requests that at a minimum the Forest Service include an option for tethered logging on Patrick. The small acreage requirements for cable logging (6 percent of the commercial acres in Alternative 2) make attracting a skyline logging company even more difficult.

3. Appropriate treatments in RHCAs are critical.

AFRC scoping comments stated: *AFRC fully supports treatments in RHCAs, both noncommercial and commercial. AFRC will not support a reduction in the acres of commercial treatments in RHCAs. RHCAs are the most productive areas on the landscape and change rapidly over time and the reestablishment of willows, hardwoods, and other shrubs is critical to the effective function of streams. The next entry may be too late given the extreme fire seasons that this area has been experiencing over the last decade.* The current drought, extreme heat and fire season we are now experiencing further emphasizes those comments.

Resolution Requested

- AFRC requests that the Deciding Official modify Proposed Alternative 2 and include the option for removal of trees greater than 21" dbh as (or if) determined to be necessary by Forest Service professionals on the ground. If the Forest is unwilling to consider this, we would like documentation on either a) what management direction is compelling the Forest to impose a 21-inch dbh limit, or b) what recent science is compelling the Forest to impose a 21-inch dbh limit.
- AFRC requests, at a minimum, including language that will allow for tethered logging systems on appropriate ground.
- AFRC does not support any reduction in conifer removal in RHCAs and requests the ability to manage RHCAs as necessary to enhance riparian vegetation and mitigate the potential for catastrophic wildfire in riparian corridors.

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