



VIA: <https://cara.fs2c.usda.gov/Public/CommentInput?Project=54090>

April 11, 2022

Carin Vadala, District Ranger  
Newport-Sullivan Lake District  
Colville National Forest  
315 N. Warren Avenue  
Newport, WA 99156

Re: Sweet Ione Resources Improvement Project

Pursuant to 36 C.F.R. § 218.8, the American Forest Resource Council (AFRC) files this objection to the proposed decision for the Sweet Ione Integrated Resources Improvement Project (Sweet Ione). The responsible official is Carin Vadala. The Sweet Ione Project occurs on the Colville 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 Sweet Ione 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  
921 SW Cheltenham Street  
Portland, OR 97239  
(503) 704-4644

**American Forest Resource Council**  
700 N.E. Multnomah, Suite 320 • Portland, Oregon 97232  
Tel. 503.222.9505 • Fax 503.222.3255

## Reasons for the Objection

The content of this objection below is based on prior specific written comments submitted by AFRC in response to the scoping document on July 18, 2019, and the Draft Environmental Assessment (EA) on November 12, 2021, which are hereby incorporated by reference.

### **1. The Preferred Alternative will not accomplish the Purposes and Needs outlined for the Project as it applies to meeting HRV and supporting jobs.**

The Purposes and Needs as it appears in the Final EA includes the following:

- Moving forest stands toward their historical range of variability for structure, patch size, and tree species composition.
- Reducing the potential for high-severity wildfires in the wildland-urban interface (WUI) areas, providing protection for communities and diversity within stands.
- Improving aquatic and riparian habitat condition.
- Improving habitat conditions for big game and federally protected species such as grizzly bears and wolverines.
- Supporting local jobs and labor income within the counties surrounding the forest through a predictable and sustained flow of timber and forest products to support economic benefits and sustainability within the capability of the ecosystem.
- Providing a system of safe and sustainable authorized roads and bridges that provides public and administrative access where suitable and supports forest management objectives, commensurate with maintenance levels, levels of use, and available funding.

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 Purposes and Needs on 500 acres is inferior to meeting the stated Purposes and Needs on 600 acres. Moreover, alternatives that only partially meet the Purposes and Needs of a project should not be considered in detail. *See, e.g., Cascadia Wildlands v. Bureau of Land Mgmt.*, 410 F.Supp.3d 1146, 1161 (D. Or. 2019) (finding that the BLM was not arbitrary and capricious for not analyzing plaintiffs' thinning alternative in detail because it did not meet one of the purposes of the project to shift age-class distribution in the project area).

In our Draft EA comments, we noted that AFRC was “*disappointed that the total number of acres being commercially treated in the Draft EA was reduced from the acres identified in scoping. While the District added an additional 4 units (87-90) totaling 365 acres of commercial treatments, an overall reduction of 1,235 acres was made, from a variety of units, due to considerations for late structural stage stands, wildlife, aquatic vegetation, hardwood component, and others.*”

The charts below show the differences in treatment acres between scoping and the Final Decision.

Table 4 is from the Scoping Document and shows the planned Commercial Harvest, which totaled 9,115 acres for treatment:

**Table 4. Proposed commercial vegetation treatments, acres and descriptions within the project area**

| Commercial Vegetation Treatments |                    |                                                                                                                                                                                                                       |
|----------------------------------|--------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Treatment Type                   | Acres <sup>1</sup> | Treatment Description                                                                                                                                                                                                 |
| Shelterwood                      | 1,615              | Regeneration treatment that retains mainly dominant and co-dominant trees. Piling of slash and fuels in excess of what is desired to meet large woody debris and soil productivity objectives. Piles would be burned. |

| Commercial Vegetation Treatments |                    |                                                                                                                                                                                                                                                                                                                                      |
|----------------------------------|--------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Treatment Type                   | Acres <sup>1</sup> | Treatment Description                                                                                                                                                                                                                                                                                                                |
| Thinning                         | 4,420              | Thinning typically targets suppressed or intermediate trees for removal. Some dominant and co-dominant trees may be removed to meet stand density objectives or to favor healthier trees. Piling of slash and fuels in excess of what is desired to meet large woody debris and soil productivity objectives. Piles would be burned. |
| Mixed Harvest                    | 3,080              | Both shelterwood and thinning treatments would occur.                                                                                                                                                                                                                                                                                |
| <b>Total Acres</b>               | <b>9,115</b>       |                                                                                                                                                                                                                                                                                                                                      |

Table 1 is from the final EA and shows a reduction in the commercial acres to be treated.

**Table 1. Proposed commercial vegetation treatments, acres, and descriptions within the project area**

| Treatment Type     | Acres        | Treatment Description*                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|--------------------|--------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Shelterwood        | 1,240        | A regeneration harvest method that removes trees, except those needed for regeneration purposes. This type of harvest prepares the seed bed and creates a new age class of trees. Reserve trees would be retained to create a two-aged stand of a desired species composition. Additional live trees would be retained for reasons other than regeneration, such as trees meeting the large tree guidelines, wildlife trees, or trees that would be retained for other silvicultural reasons. Planting of desirable tree species may follow shelterwood treatments in areas lacking natural regeneration or desirable seed trees. |
| Thinning           | 3,505        | Thinning typically targets suppressed or intermediate trees for removal. Some dominant and co-dominant trees may be removed to meet stand density objectives or to favor healthier trees.                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| Mixed Harvest      | 3,135        | Both shelterwood (60%) and thinning (40%) treatments would occur.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <b>Total Acres</b> | <b>7,880</b> | Expected timber volume is 40-60 million board feet (MMBF)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |

AFRC does not believe the Forest Service can achieve its goals of moving forest stands toward their historical range of variability for structure, patch size, and tree species composition, and of supporting local jobs and labor income within the counties surrounding the forest through a predictable and sustained flow of timber and forest products to support economic benefits and sustainability within the capability of the ecosystem by reducing the number of acres being treated commercially.

## Resolution Requested

AFRC requests the Deciding Official review the acres proposed for commercial treatments and include some of the acres that were listed in scoping. AFRC is very concerned that the Purpose and Need cannot be achieved by dropping 375 acres of shelterwood and 915 acres of thinning. As the current decision is a draft decision, potential exists for an increase in the level of acres treated and the intensity of those treatments that would benefit the objectives overall.

## 2. The Forest Service is not adequately reducing the potential for high-severity wildfires in the wildland-urban interface areas, and not providing protection for communities and diversity within stands.

The Forest Service should strive to create more defensible space within the WUI, and AFRC does not believe you are achieving the goals of the Pend Oreille County Community Wildfire Protection Plan (CWPP). The chart below illustrates this.

Table 11 from the Final EA shows that only 8,000 acres of the CWPP will be treated.

### Wildland Urban Interface (WUI) and Historical Infrastructure

**Table 11. Acres of Defensible Zones within Wildland Urban Interface - Currently and Following Treatments**

| Resource Element                                             | Resource Indicator                                                                                    | Measure                             | Existing Condition                                                   | Proposed Action                                                      |
|--------------------------------------------------------------|-------------------------------------------------------------------------------------------------------|-------------------------------------|----------------------------------------------------------------------|----------------------------------------------------------------------|
| Wildland Urban Interface (WUI) and Historical Infrastructure | Defensible zones such as fuel breaks near structures and private property, strategic fuel treatments. | Acres treated within identified WUI | 0 known acres of defensible space/ targeted WUI treatment identified | 8000 acres of harvest and fuels treatment within CWPP designated WUI |

The Draft EA is only treating 8,000 acres within the CWPP, which is only 39%. As pointed out in the Draft EA:

*“As WUI continues to expand further into previously undeveloped areas, the previous, current, and future vegetation treatments result in the continued maintenance of these areas would become crucial to firefighting success over the next 20-30 years.”*

Since the Forest Service acknowledges the WUI will be increasing, it only makes sense to treat more of those acres *now*, knowing that more acres will need treatment in the future.

AFRC also commented that we supported the use of shaded fuel breaks along major roads that provide ingress and egress within the WUI. When designing these shaded fuel breaks, they should be at least 200 feet on each side of the road and thinned to 40 square feet of basal area to be an effective fuels break or fire containment line. The District did not respond to our request for this work, which we think is critical to provide ingress and egress to the WUI.

### Resolution Requested

AFRC requests the Deciding Official develop a plan more in line with the Pend Oreille County Community Wildfire Protection Plan. Currently, only treating 39% of the CWPP does not meet the Purpose and Need for the project and puts much of the area at risk.

### 3. AFRC objects to the amount of decommissioning (9 miles) and obliteration (8 miles) that is being planned.

The chart below shows the work that is planned for decommissioning and obliteration of unauthorized roads.

#### Sweet-Ione Integrated Resources Improvement Project Environmental Assessment

| Proposed Road Work*                 | Approximate Length** (miles) | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|-------------------------------------|------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Decommission existing NFS roads     | 9.0                          | Render roads undrivable through a variety of methods such as, but not limited to, sub-soiling, re-contouring, or removing culverts. Decommissioning methods are the same as those described above under build new temporary roads. 1.75 miles proposed for decommissioning are currently open. Decommissioning would occur on the end portion of existing roads.                                                                                                                                                                                                                                                                  |
| Obliteration of unauthorized routes | 8.0                          | Remove unauthorized routes and restore the area following project activities using any or all of the following actions: <ul style="list-style-type: none"><li>• recontouring the existing roadbed to match the adjacent topography,</li><li>• removing culverts or other stream channel crossing structures,</li><li>• seeding,</li><li>• planting trees</li><li>• soil decompaction,</li><li>• and placement of down woody material or rocks or other similar restoration activity.</li></ul> Unauthorized routes discovered during implementation would be reviewed by IDT specialists for inclusion in restoration treatments. |

In our Draft EA comments, we reminded the Forest Service that an intact road system is critical to the management of Forest Service land, particularly for the provision of timber products in the general timber designated lands. Without an adequate road system, the Forest Service will be unable to offer and sell timber products to the local industry in an economically feasible manner.

Further, AFRC believes a significant factor contributing to increased fire activity in the region is the decreasing road access to our federal lands. This factor is often overshadowed by both climate change and fuels accumulation when the topic of wildfire is discussed in public forums. However, we believe that a deteriorating road infrastructure has also significantly contributed to

recent spikes in wildfires. This deterioration has been a result of both reduced funding for road maintenance and the federal agency's subsequent direction to reduce their overall road networks to align with this reduced funding.

In our Draft EA comments, we told the District that we would like to see the analysis consider potential adverse impacts to fire suppression efforts due to the reduced access caused by the reduction in the road network. We believe this road network reduction will decrease access to wildland areas and hamper opportunities for firefighters to quickly respond and suppress fires.

AFRC doesn't believe the current road plan meets the Purpose and Need of providing a system of safe and sustainable authorized roads and bridges that provides public and administrative access where suitable or supports forest management objectives, commensurate with maintenance levels, levels of use, and available funding. Specifically, we are very concerned about the level of funding needed for the decommissioning and obliteration.

### **Resolution Requested**

The Forest Service has failed to take a hard look at the potential adverse impacts to fire suppression efforts due to the reduced access caused by the reduction in the road network. AFRC requests that the Deciding Official clarify the rationale for the amount of both decommissioning and obliteration of a total of 17 miles. AFRC also believes that a close economic analysis of the cost of closing and obliterating these roads needs to be done as well.

### **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".

Travis Joseph  
President