



VIA Link: objections-pnw-colville@usda.gov

February 15, 2024

Colville National Forest
Attn: Objection Reviewing Officer
765 S. Main
Colville, WA 99114

Dear Reviewing Officer:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to provide a letter of support for the Bulldog Project that is currently in the Objection Period.

AFRC is a regional trade association whose purpose 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. Many of our members have their operations in communities within and adjacent to the Colville National Forest and management on these lands ultimately dictates not only the viability of their businesses, but also the economic health of the communities themselves. AFRC submitted a scoping letter on June 1, 2018, a Draft EA comment letter on September 2, 2020, and comments on the Supplemental EA on November 1, 2023.

We are writing this letter to support implementation of the Project despite our disappointment with the Project modifications made in response to the U.S. District Court ruling in *Kettle Range Conservation Group v. USFS, et al.*, No. 2:21-cv-00161-SAB (E.D. Wash. filed May 12, 2021) vacating the Large Tree Management Guideline (FW-GDL-VEG-03) of the 2019 Colville National Forest Land Management Plan (2019 Forest Plan). The revised proposed action eliminated 220 acres of commercial treatment and imposed a diameter limit of 21-inches across all remaining treatment units. Additionally, the Bulldog Supplemental EA deferred vegetation and fuels treatments on approximately 1,165 acres within suitable lynx habitat residing with the US Lynx Analysis Unit (LAU). The US LAU landscape, in its current condition, does not meet

the desired conditions representative of the HRV in terms of structural composition. However, the supplemental information showed that the removal of these treatments results in minor changes to the Project's effects in terms of restoring the landscape toward HRV.

We appreciate the Forest Service's acknowledgement in the Draft Decision that the modified proposed action represents a diluted attainment of the Project purpose and need. We remain optimistic that the Forest Service will pursue changes to its Forest Plan that will jettison the outdated and unscientific "eastside screens" that continue to hinder effective forest restoration and fuels reduction treatments across eastern Washington and Oregon. However, we believe that the expedited attainment of these diluted end-results is preferable to taking no action in the foreseeable future and therefore support the treatments in the Draft Decision.

While we are not formally objecting to any component of the proposed action, we do disagree with one aspect of the Draft Decision. That Decision states that "the revised proposed action for the Bulldog project also meets the intent of Executive Order 14072, April 27, 2022." We disagree.

While the "intent" of EO 14072 can be debated, its plain language is clear. Among other things, the EO emphasizes the management of federal forests to "promote their continued health and resilience, mitigate the risk of wildfires, and enhance climate resilience." Nowhere in the EO does the President call for diameter limits, particularly when such limits would hinder the attainment of forest health and wildfire resilience objectives. Instead, the EO explicitly calls for the pursuit of "wildfire mitigation strategies, which are already driving important actions to confront a pressing threat to mature and old-growth forests on Federal lands: catastrophic wildfires driven by decades of fire exclusion and climate change."

It seems contradictory for the Draft Decision to assert compliance with this EO while also asserting that "by using Eastside Screens, we are leaving trees that would not have existed under historical fire regimes and pose a risk to older early-seral trees through acting as ladder fuels and competition." Ultimately, we believe that the Bulldog Draft Decision does not meet the intent of EO 14072 as its modified treatments will result in elevated threats to all forest types, including mature and old growth, when compared to the first iteration of the project. We urge the Forest Service to delete or modify this section of the Draft Decision.

Finally, we would like to compliment the Forest on the responses to three of our other concerns--managing in the riparian, operating protocols, and taking an in-depth look at issues involving carbon and climate change to supplement the record.

- **Response:** *RMA treatments were approved under the Bulldog EA FONSI and are carried forward under the SEA, except for where those commercial treatments occurred in affected late old structure (LOS). Project design criteria (Bulldog SEA, Table) and Standard Practices (Bulldog Implementation Guide, ensure we are complying with the standards set forth in the 2019 Forest Plan, while still maximizing the effectiveness and scale of restoration treatments.*

- **Response:** *The commenter is correct that modernizing the methods by which we achieve restoration goals is an important part of forest management. The Forest Plan lays out guidance on managing for continued soil productivity (FW-OBJ-SOIL-01 and FW-STD-SOIL-01). For the purposes of gauging effects under NEPA, the agency must make its best-informed assumptions on harvest systems and suitable equipment given the forest conditions and terrain. The commenter knows that during implementation, the timber appraisal process also requires inputs related to harvest systems to estimate the costs associated with treatment, and that methods exists for changing the approved logging systems during implementation, so long as the equipment used meets the needs of the resources.*
- **Response:** *A supplemental Carbon and Climate Change Vulnerability report was developed and is available in the project record. This report addresses climate driven vulnerabilities in the project area and project adaptations to address these vulnerabilities based on the peer-reviewed climate change vulnerability assessment, Adaptations to Climate Change: Colville and Okanogan-Wenatchee National Forests (Gaines 2012) that analyzes how changes in climate will impact valued ecological, hydrological, and social resources on the Colville National Forest. The Climate Change Carbon assessment portion of the report uses the literature cited in these comments and the Forest Carbon Assessment for the Colville.*

AFRC appreciates the opportunity to discuss our concerns and to provide some support for the Bulldog Project during the Supplemental EA Objection period. We would like the Forest to not only consider these comments for implementation during the Bulldog Project, but also please consider them in the developing Dollar Project which is in the vicinity of Bulldog.

If other objections are received and a resolution meeting is scheduled, we would like the opportunity to attend and participate to continue our committed involvement in the planning of the Bulldog project.

Sincerely,



Tom Partin
AFRC Consultant

