



VIA: <https://www.fs.usda.gov/project/ochoco/?project=62658>

November 4, 2024

Eric Watrud, Reviewing Official
Attn: Tiger-Mill Project
72510 Coyote Road
Pendleton, OR 97801

RE: Tiger Mill Objection

Pursuant to 36 C.F.R. Part 218.7, the American Forest Resource Council files this objection to the proposed draft decision for the Tiger-Mill Project. Johnny Collin, District Ranger, is the responsible official. The Tiger-Mill Project occurs on the Walla Walla District on the Umatilla 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, Nevada, 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 Tiger-Mill 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 the Tiger-Mill scoping outreach letter, which are hereby incorporated by reference.

When compared to the Proposed Alternative A, Alternative A modified 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 Final EA includes the following:

"Contribute to a predictable and sustainable supply of timber products"

"Actively manage stands to improve stand conditions, diversity, density, and structure"

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. 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 Purpose & Need on 500 acres is inferior to meeting the stated Purpose & Need on 600 acres.

In our comments on proposed scoping, we expressed support for maximizing commercial and noncommercial treatments on as many acres as possible, including acres in RHCA's and Inventoried Roadless areas. Our Draft EA comments stated that: *the consideration of every stand where treatment is appropriate, regardless of its land allocation, is important to our membership as each year's timber sale program is a function of the treatment of aggregate forested stands across the landscape.* This concern over maximizing treatment acres applies not just to our membership's needs but also to the full attainment of the stated Purpose & Need as referenced above. Any reduction in acres will inhibit the attainment of the project objectives.

Fewer acres treated will result in fewer acres with improved species composition, density, and structure and fewer acres that will be more resilient to wildfire.

Ultimately, we believe that full implementation of the acres in the Draft Decision Notice is the only way to best meet the Purpose & Need and to maximize its attainment, particularly the portion of the Purpose & Need that addresses the need for age-class diversity and long-term wood products, and that any incorporation of elements of the other alternative would retard this attainment.

Resolution Requested

AFRC requests that the Deciding Official select Alternative A, as originally proposed in the scoping outreach document, as the preferred alternative. As the current decision is a draft decision, potential exists for both the reduction of the level of acres treated and the intensity of those treatments that would compromise the forest health and diversity objectives stated.

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 stylized with a large, sweeping initial "T" and a cursive "Joseph".

Travis Joseph
President