



VIA: <https://www.fs.usda.gov/project/?=58480>

April 21, 2025

Shaun McKinney, Forest Supervisor
Wallowa-Whitman National Forest
1550 Dewey Avenue Suite A
Baker City, OR 97814

RE: Baker City Watershed Fuels Management Objection

Dear Supervisor McKinney:

Pursuant to 36 C.F.R. Part 218.7, the American Forest Resource Council files an objection to the proposed draft decision for the Baker City Watershed Fuels Management project (BCW). Whitman District Ranger, Jeremy Aujero, is the responsible official. The BCW project occurs on the Whitman Ranger District on the Wallowa-Whitman National Forest.

AFRC is an Oregon nonprofit corporation that represents the forest products industry throughout Oregon, Washington, Idaho, Montana, California and Nevada. 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 BCW 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. Many of AFRC members in central and eastern Oregon are approximately 95 percent dependent on raw materials procured from public lands to run their businesses.

Objector's Designated Representative

Irene Jerome, AFRC Consultant
408 SE Hillcrest Rd

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

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 Draft EA which are hereby incorporated by reference.

Ultimately, we believe that Marble Creek Road must be improved to an Objective Maintenance Level 3 standard to allow adequate access for various emergency vehicles in the event of wildfire in the watershed. Baker City Watershed provides clean water for over 10,000 residents and many tourists and recreationists, businesses, health care facilities and more. In 2023 it was determined that a new treatment facility, in the event the current facility was destroyed by fire, would cost the city in excess of \$20,000,000.

We recognize that the urgent need to reduce fuels in a timely manner complicates the Forest Service's ability to consider a project specific forest plan amendment to remove grand fir trees 21 inches and greater. Although the vegetation analysis did not find that leaving these trees substantively changed fire behaviors in the near term, leaving them in the overstory compromises present and future stand compositions and hampers the agency's ability to meet the project's purpose and need.

Resolution Requested

AFRC requests that the Deciding Official improve Marble Creek Road to a maintenance level 2 and reconsider a project-specific plan amendment to address trees over 21 inches. If such an amendment is not feasible at this time, we would appreciate a clear timeline for analysis and re-entry into the watershed that would allow for appropriate removal of grand fir trees regardless of diameter.

AFRC submitted written comments in response to the Draft EA and addressed our concerns regarding the maintenance level of the Marble Creek Road and the issue of leaving grand fir trees greater than 21 inches in diameter.

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 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.

Commented [AG1]: I don't think we need make this request, but let me know if you disagree and would like to discuss.

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,



Travis Joseph
President