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Organization: American Forest Resource Council

Title: AFRC Consultant

Comments: The content of this objection below is based upon the prior specific written comments submitted by AFRC in response to the Draft EA on September 22, 202, which are hereby incorporated by reference.

1. AFRC believes the Proposed Alternative (Alternative B) fails to adequately meet the Purpose and Need of the project and incorporation of this Alternative 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:

1. Reduce the risk of wildfire to communities and decrease the potential for high intensity wildfire.
2. Increase forest resilience to drought, wildfire, altered fire regimens, and insects and disease.
3. To have a transportation system that supports the project, meets public and administrative needs and accounts for resource concerns.
4. Contribute to the supply of timber from the National Forest System.

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 our Draft EA comments, we expressed concern regarding the scope of the project relative to the project area. The Draft Decision Notice and EA consider the treatment of 6,043 acres, which constitutes only 10% of the entire project area managed by the Forest Service. Our Draft EA comments stated that: [ldquo]we remain disappointed that the Forest is choosing to mechanically harvest timber on only 6,043 acres which is less than 10% of the Project area. This represents a reduction of 153 acres from scoping.[rdquo]

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.

AFRC also raised concerns about the Forest not being able to meet the Purpose and Need of reducing the risk of wildfire to communities and decrease the potential for high intensity wildfire: [ldquo]AFRC does not believe the Forest will be able to accomplish the work needed within the two CWPP areas. The chart below shows the

proposed work.[rdquo]

When we visited the project area last summer, we saw many stands in a similar condition as the picture below:

AFRC does not believe the Forest is going to be able to safely treat 13,070 acres with low severity burns given the thick condition of the vegetation. Much of the area has dense stands with ladder fuels that will quickly allow the fire to leave the ground and get into the tree crowns. We strongly believe that more acres need to be mechanically treated BEFORE the low severity underburns can be done safely.

Ultimately, we believe that more acres need to be harvested commercially to meet both the Purpose and Need of contributing to the supply of timber from the National Forest System and reducing the risk of wildfire to communities and decreasing the potential for high intensity wildfire.

Resolution Requested

AFRC requests that the Deciding Official should at a minimum add back in the 153 acres of commercial harvest that was removed from scoping to the Draft EA and to make additional acres available to commercial harvest even if they are optional. The District should also evaluate how safely they can conduct the 13,070 acres of under burning. AFRC believes the only way to burn many of those acres safely is to conduct commercial harvests before burning.

2. The economic analysis and supporting documentation fails to adequately disclose the economic viability of the collective proposed actions.

AFRC is very concerned about the economic viability of this project and the ability of the District to get the planned work completed. It is unclear if funding will be available to implement the proposed prescribed burning in the CWPP, road decommissioning, precommercial thinnings and other work. The following charts illustrate our concerns.

Table 28 points out that the amount of money for timber harvest and design features give a positive Present Net Value of \$1.226 million. However, when the other resource activities are subtracted (table 29) the Timber Harvest and All Other Planned Non-Timber Activities are negative by \$4.983 million.

With such a negative economic analysis, AFRC does not think the District can accomplish the first three points in your Purpose and Need. Implementing the work to protect the Wildland Urban Interface areas as pointed out in the CWPPs is unrealistic. The District will not be able to complete all of the road decommissioning and other road work including road relocation, and finally there will be no money for precommercial thinning. AFRC strongly recommends you reconsider adding more merchantable volume to the project, explore economically viable logging methods, and be realistic on what you can accomplish. AFRC and our members would like to work closely on this economic issue to try to get the project to break even at a minimum.

Resolution Requested

AFRC requests that the Deciding Official clarify how all the designated work listed table 29 will get accomplished with the predicted revenue that will be generated from the sale of timber.

3. The estimated costs of proposed road decommissioning could result in uneconomical timber sales.

AFRC stated in our Draft EA comments that we do not support obliteration or recontouring roads that are to be decommissioned because of the high cost involved. The project is already very uneconomical. We also noted that only those roads where potential resource damage risk outweighs access value should be considered for decommissioning.

The work needed to do the proposed road decommissioning, road storage and aquatic organism passage culverts will total over \$600,000. We stated in our Draft EA comments that [ldquo]there are alternative methods to mitigating potential resource damage caused by poorly designed or poorly maintain roads aside from full decommissioning. Removing or replacing ineffective culverts, installing waterbars, and blocking access are all activities that can mitigate resource damage while maintaining useful roads on the landscape for future use. Please consider these methods as an alternative to full decommissioning.[rdquo]

Resolution Requested

AFRC requests the Forest reanalyze the entire road package so that work that is being planned can be paid for by the Project revenues. Decommissioning is expensive and AFRC would like a commitment from the Forest that decommissioning will be done by the use of barriers or blockage of the road entrances. AFRC believes the proposed work to be completed cannot be accomplished with the volume planned for sale.

Request for Resolution Meeting

Pursuant to 36 C.F.R. [sect] 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. [sect] 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.