



VIA CARA: <https://cara.ecosystem-management.org/Public//CommentInput?Project=46306>

June 2, 2017

Kelly Lawrence, District Ranger  
Naches Ranger District  
Okanogan-Wenatchee National Forest  
10237 Highway 12  
Naches, WA 98937

RE: Draft Decision Notice, Huckleberry Restoration Project

Pursuant to 36 C.F.R. Part 218.7, the American Forest Resource Council (AFRC) files this objection to the Draft Decision Notice for the Huckleberry Restoration Project, which is a modification of the Little Crow Restoration Project. Okanogan-Wenatchee National Forest Supervisor, Mike Williams is the responsible official. Huckleberry and Little Crow occur on the Naches Ranger District on the Okanogan-Wenatchee National Forest.

**Objector**

American Forest Resource Council  
5100 SW Macadam, Suite 350  
Portland, Oregon 97239  
(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 Huckleberry Restoration 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.

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### **Objector's Designated Representative**

Tom Partin

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(503) 704-4644

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### **Reasons for the Objection**

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.

### **Implementing only a small portion of the Modified Preferred Alternative as described in the Final Little Crow Restoration Project EA will not fully meet the purpose and need of the project**

In the proposed Huckleberry Restoration Project, the Forest has decided to only implement restoration activities described in the Final Little Crow Restoration Project EA (EA) outside of Late-Successional Reserves and Managed Late-Successional Areas over an area of approximately 711 acres. This represents a mere 1.2% of the 56,936 acres within the Little Crow Restoration Project area boundary and only 2.6% of the 27,213 acres designated for restoration activities in the EA. It also fails to acknowledge the difference between LSRs and MLSAs. MLSAs recognize that fuels reduction is important in certain areas east of the Cascades to ensure that owl habitat is not lost to catastrophic fire.

The Modified Proposed Action as described in the EA already withdrew 52% of the area from treatment by limiting treatment to areas outside of designated Wilderness and Inventoried Roadless Areas (IRAs). While deferring treatment in designated Wilderness is Congressionally-mandated, restoration activities within IRAs are permitted if the purpose of the activities is to restore the ecosystem function within these areas. Roadless Area Conservation Rule § 294.13(b)(1)(ii), 66 Fed. Reg. 3,244, 3,273 (Jan. 12, 2001). The decision to not treat these areas severely limits the achievement of the project's purpose and need.

The Draft Huckleberry Decision Notice also prohibits any timber harvest within Riparian Reserves while the EA states that "(R)iparian/stream treatments and recreation treatments are also proposed as site specific locations within the planning area." This decision also further reduces the likelihood of achieving the purpose and need of the project. AFRC believes that there is a large risk to catastrophic wildfire in the Riparian Areas due to heavy fuel loadings and by not treating these areas they will be in jeopardy of wildfire and degradation of the hydrologic system and water quality provided by those riparian areas. Not treating these areas will also hamper the purpose and need to improve hydrologic function and water quality. The Northwest Forest Plan (NWFP) provides for treatment in situations like these where Aquatic Conservation Strategy (ACS) objectives are not being met. NWFP Standards and Guidelines at C-32.

The decision to impose a 25-inch diameter limit will prohibit the stands from achieving their maximum growth and forest health potential. In our written comments, AFRC suggested that in those areas being treated for fire resiliency, and for enhancement of large and old tree development, thinnings should be conducted that will significantly reduce the basal area and crown closure in the stands. Since this project area will probably not be entered for at least another two decades, the stands should be thinned to a spacing that will provide for maximum growth and forest health for at least that time.

The decision to not treat in spotted owl suitable habitat will further reduce the likelihood of achieving the purpose and need of the project. Much of the suitable spotted owl habitat occurs in areas that have been allowed to become overstocked to the point of being outside the range of natural variation. These stands are at high risk of insect and disease infestation and catastrophic wildfire. These areas should be treated to bring them closer to their natural condition.

**The cost of decommissioning roads will divert funds needed to preform additional restoration activities while providing no additional ecological protection above those provided by closing and storing the roads**

The EA calls for the decommissioning of 24.4 miles of system roads and 10 miles of unauthorized roads. The cost of decommissioning is extremely high and does not provide any advantage ecologically from closing and storm proofing roads. This money would be better spent on conducting further restoration work via the use of Knutson-Vandenberg funds.

**The Draft ROD does not comply with the NWFP Standards and Guidelines.**

The project is within the portion of the Wenatchee National Forest subject to the Northwest Forest Plan (NWFP). As such the Wenatchee Land & Resource Management Plan (WFP) is considered amended by the NWFP. The draft ROD refers to the Wenatchee LRMP “as amended,” and the EA treats the NWFP as part of the WFP. EA at 1-4. However, the draft ROD refers only to compliance with the WFP standards and guidelines. Draft ROD at 20. This is not sufficient to verify that the project complies with the binding standards and guidelines of the NWFP.

The draft ROD arbitrarily drops all treatments in MLSAs and LSRs. It does not offer a separate rationale or analysis for dropping MLSA treatment. By treating Managed Late-Successional Areas as equivalent to Late-Successional Reserves, and dropping treatments in all MLSAs, the Forest is violating the NWFP direction to maintain suitable habitat “using various management techniques” and to “help prevent complete stand destruction from large catastrophic events such as high intensity, high severity fires; or disease or insect epidemics.” NWFP Standards and Guidelines at C-26. The EA reveals there is an urgent need for such work. EA at p. 1-6 to 1-7. The failure to treat in MLSAs is arbitrary, capricious, and in violation of the governing Forest Plan.

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**Resolution Requested**

AFRC requests that the Deciding Official not incorporate any additional restrictions or remove additional acres from treatment in the final decision. Potential exists for further compromise of the economic viability of this project and ultimately fails to meet the stated purpose and need. AFRC also requests that the roads identified for decommissioning instead be closed and storm proofed so that those funds can be used for additional restoration activities. AFRC further requests that the arbitrary 25-inch diameter limit be withdrawn from the final decision so that the purpose and need can be fully accomplished on the very limited area being treated.

The Deciding Official should restore treatment in MLSAs to ensure the project complies with the NWFP.

**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, 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". The signature is stylized with a cursive script.

Travis Joseph  
President