



VIA: <https://www.fs.usda.gov/project/?project=50218>

April 13, 2020

Reviewing Officer
Intermountain Region USFS
324 25th Street
Ogden, Utah 84401

RE: Huckleberry Landscape Restoration Project Objection

Pursuant to 36 C.F.R. Part 218.8, the American Forest Resource Council files this objection to the proposed draft decision for the Huckleberry Landscape Restoration Project (Huckleberry). Linda Jackson, Forest Supervisor is the responsible official. The Huckleberry project occurs on the Council Ranger District on the Payette 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, 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 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, Consultant
408 SE Hillcrest Rd
John Day, OR 97845
541-620-4466
ijerome@amforest.org

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.

AFRC objects to the Forest's decision to omit socioeconomics and the support of the local forest products industry in the Purpose and Need.

In our written comments on the DEIS, AFRC specifically requested that the Forest Service add a statement to the Purpose and Need to clearly articulate the importance of “supporting and maintaining the forest products infrastructure.”

Contributing to the economic vitality of local communities is critical. Maintaining and enhancing the local forest products infrastructure, including all phases of the manufacturing structure from the logging phase through the creation of paper products is also critical. The world is currently in the grip of the coronavirus pandemic. Businesses are shutting down and the economy is suffering. The need for wood products is *more critical now than ever*. A shortage of paper products has left store shelves bare across the nation. On Monday April 6, 2020 an editorial in the Seattle times stated:

The effects of a construction halt ripple through Washington's forest-products industry and could affect everyone, particularly those hunting for toilet paper. When construction stops for an extended period, sawmills curtail production, reducing the output of sawdust and wood chips necessary to make paper products. That's a big concern when mills producing toilet paper face huge increases in demand.

This also applies to the Idaho forest products industry and the area surrounding the Payette National Forest.

AFRC objects to the deferral of commercial treatment on 270 acres due to the lack of easement across private lands.

In our DEIS written comments we requested that the Forest maximize treatment of appropriate units because “The consideration of active management on every acre of appropriate land, 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.”

Opportunities may be available in the future for accessing these acres. Given that they are part of the watershed and a great deal of effort has gone into environmental analysis to date, maintaining these acres as a part of the analysis area is appropriate.

Resolution Requested

AFRC requests that the Deciding Official incorporate “Maintaining and enhancing the local forest products infrastructure” directly into the Huckleberry Purpose and Need. AFRC requests

that 270 acres of commercial treatments currently without easement across private lands be maintained for consideration and potential management in the future.

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 "J".

Travis Joseph
President