

Data Submitted (UTC 11): 6/30/2017 11:00:00 AM

First name: Irene

Last name: Jerome

Organization: American Forest Resource Council

Title:

Comments: Via email: objections-intermtn-regional-office@fs.fed.us

June 30, 2017

Objection Reviewing Officer Intermountain Region USFS 324 25th St

Ogden, UT 84401

Re: Middle Fork Weiser River Landscape Restoration Project Objection Dear Objection Reviewing Officer:

Pursuant to 36 C.F.R. Part 218, the American Forest Resource Council (AFRC) files this objection to the proposed decision for the Middle Fork Weiser River Landscape Restoration (MFWR) project. The responsible official is Forest Supervisor Keith Lannom. MFWR occurs on the Payette National Forest (PNF).

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 MFWR 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

408 SE Hillcrest Rd John Day, OR 97845 (541) 620-4466

ijerome@amforest.org

5100 S.W. Macadam Avenue, Suite 350

Portland, Oregon 97239

Tel. (503) 222-9505 [middot] Fax (503) 222-3255

Reasons for the Objection

The content of the objection below is based upon the prior specific written comments submitted by AFRC in response to scoping and to the MFWR environmental impact statement (EIS) which are hereby incorporated by reference.

AFRC objects to the reduction of work proposed in riparian conservation areas (RCAs). The selected alternative, Alternative 5, reduces treatments in RCAs by 465 acres and acres treated within one site potential tree height by 13 acres over Alternative 4. Research provided by Charlie Luce strongly encourages treating right next to streams to enhance riparian areas. This type of work directly next to streams does the most to stabilize stream banks and accelerates vegetation sprouting after fire. The PNF is charged with utilizing the "best available science" when treating these RCAs. Some areas of the MFWR project have roads that are close to streams with the vegetation next to the roads away from the streams are in desperate need of treatment or provide for firefighter safety and access. Alternative 4 provides for the most treatment of RCAs.

AFRC objects to the limited number of acres treated in potential vegetation groups (PVGs) 7 - 11. These vegetation groups are in critical need of treatment and recent science strongly supports and advocates management in these higher elevation forests. Please refer to the recent publication PNW- GTR-897: "The Ecology and Management of Moist Mixed-Conifer Forests in Eastern Oregon and Washington: a Synthesis of the Relevant Biophysical Science and Implications for Future Land Management." Unfortunately, the Forest Service has tended to avoid treatment in these areas in the past despite supportive science. The MFWR project area has some whitebark pine in PVG-11 and Alternative 5 does not provide enough treatments to help sustain and enhance that important species. As a result of additional treatment of PVGs 7-11, Alternative 4 provides the most work toward maintaining and promoting large tree size classes across the landscape, an important part of moving the Forest toward the desired condition.

AFRC objects to limiting the number of acres treated in PVGs 7 - 11 because the Deciding Officer chooses not to implement a "site-specific, nonsignificant Forest Plan amendment to allow more than 30% lynx habitat to be made unsuitable from vegetation management activities." AFRC, in conjunction with the Payette Forest Coalition, attended a field trip to the MFWR project planning area in November 2015. One of the discussion stops was in an area that is designated as lynx habitat. However, according to the Forest Service wildlife biologist, the area is not suitable for lynx due to a lack of appropriate food sources and at best would be habitat for secondary populations of lynx. Game cameras in the area for several years have not identified any lynx passing through the area nor is there any record of lynx ever being in the area.

AFRC objects to limiting the number of acres treated in PVGs 7 - 11 because it limits the opportunity to do appropriate treatments next to the Tamarack Ski Area and Resort and the heavily developed Cascade Lake west side. During the 2007 Grays Creek Fire, the Governor of Idaho declared a state of emergency to ensure these areas were protected and provided the resources to do so. Adams County is in the process of adding this area as a Wildland Urban Interface (WUI) to their Community Wildfire Protection Plan. Additionally, there is no discussion of how the acres of shaded fuelbreaks will be maintained.

AFRC objects to the selection of Alternative 5 rather than Alternative 4. The only reason cited for not selecting Alternative 4 is the need to request a "site-specific, nonsignificant Forest Plan amendment to allow more than 30% lynx habitat to be made unsuitable from vegetation management activities." In general as displayed in Table ROD-8, Alternative 4 provides the most significant benefits for all the resource areas including the most acres of vegetation management treatments, the most acres in RCA treatments, the most acres treated through prescribed burning, the most miles of roads decommissioned in RCAs, the most miles of road realignment, the most miles of trail improved, the most acres treated to promote the large tree size class, the most acres treated to maintain the large tree size class, the most acres treated to maintain and/or promote the desired species composition, the most acres treated to maintain wet and dry meadows, the most acres treated to move toward historical fire regimes, the most acres treated to restore white-headed woodpecker habitat, the greatest number of jobs provided, the greatest number of dollars in income contribution, and less miles of temporary road constructed than Alternative 5.

Resolution Requested

AFRC requests the Forest adopt a site specific non-significant forest plan amendment to allow for creating more than 30% unsuitable Canada lynx habitat within the MFWR Lynx Analysis Unit only, and that Alternative 4 be the selected alternative.

Request for Resolution Meeting

Pursuant to 36 C.F.R. [sect] 218.11, the objectors request a meeting 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 as soon as possible 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 objection 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, Irene Jerome, at the address and phone number shown above, to arrange a date for the resolution meeting.

Sincerely,

Travis Joseph President