



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

July 12, 2019

Regional Forester
Objection Reviewing Officer, Pacific Northwest Region
USDA Forest Service
Attn. 1570 Objections
PO Box 3623
Portland, OR 97208-3623

Re: Rattlesnake Hazardous Fuel Reduction 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 Rattlesnake Hazardous Fuel Reduction Project (Rattlesnake). The responsible official is Forest Supervisor Craig Trulock. Rattlesnake occurs on the Emigrant District of the Malheur National Forest (MNF).

Objector

American Forest Resource Council
700 N.E. 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 Rattlesnake 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

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 are hereby incorporated by reference.

AFRC objects to the failure to add **economic viability & support to the local infrastructure** to the Rattlesnake purpose and need. AFRC requested during scoping that the MNF modify the purpose and need by adding “**economic viability & support to the local infrastructure.**” Supporting local industry and providing useful raw materials to maintain a robust manufacturing sector should be a principal objective of any project proposed on NFS lands. In the Rattlesnake Draft Environmental Assessment (DEA) the purpose and need is presented on page 4. The purpose and need has not been modified to include “**economic viability & support to the local infrastructure.**” Maintaining the forest products industry and providing raw materials to the local infrastructure should be a primary driver of the purpose and should be identified as a critical “need” on any project that removes commercial material regardless of the primary purpose. The forest products industry provides both the vehicle and many of the funds to help reduce the fuels in wildland urban interface areas as well as providing essential support to local economies. Milling and processing infrastructure costs millions of dollars and is very difficult to get back once it is lost. The MNF must better recognize the importance of the local forest products infrastructure by emphasizing the role industry plays in fuels reduction and potential removal to provide some economic return.

AFRC objects to any type of arbitrary diameter limits for any species including juniper, grand fir, Douglas-fir and ponderosa pine. Resource professionals must have the latitude to make site specific decisions on the ground in order to adequately meet the purpose and need of the project.

AFRC objects to the establishment of “skips and gaps” in the Rattlesnake project. Skips and gaps are difficult to implement and work around and it appears that wildlife are not utilizing them. Further, adequate areas for cover are available near project units to meet wildlife needs.

AFRC objects to any permanent road decommissioning. Roads should be closed and resource mitigation should take place on roads that may cause degradation to other resources. Road infrastructure is extremely important, and expensive to construct. It may be necessary to utilize these roads again in the future.

Resolution Requested

AFRC requests that the MNF modify the Rattlesnake proposed action by: 1) revising the purpose and need to clearly articulate the critical nature of retaining the current forest industry infrastructure by adding **“economic viability & support to the local infrastructure”** to the purpose and need of the project, 2) by removing all diameter limits, 3) by removing the requirement for establishing “skips and gaps” in the project, and 4) by eliminating any permanent road decommissioning.

Request for Resolution Meeting

Pursuant to 36 C.F.R. § 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. § 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 the Rattlesnake project and for 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