



August 19, 2019

USDA Forest Service  
Attn: Objection Reviewing Officer  
1400 Independence Ave, SW, EMC  
Mailstop 1104  
Washington, DC 20250

**Bill Harvey**

Commission Chair  
bharvey@bakercounty.org

Electronic Submittal: <https://cara.ecosystem-management.org/Public/CommentInput?project=53001>

Dear Objection Reviewing Officer:

Baker County appreciates the opportunity to provide objections as a governing body with special coordination privileges into the Pacific Northwest (PNW) Aquatic Restoration Project. The County opposes any Forest Service action without the County having waived the opportunity to coordinate, which we have not done.

Baker County has been providing comments throughout the process and therefore, has standing to make comments and objections to the current request.

The Baker County Board of Commissioners is charged with governing the County in the best interests of its citizens, their health, safety, and welfare, its economic base, and the natural environment, as are all County governments. The economic sustainability of Counties relies on both private and public lands for use of natural resources. Federal lands comprise vast areas of rural Oregon counties making any federal land use decision a direct impact on local customs, cultures, and socioeconomic conditions.

The County objects to the Forest Service's decision to approve the Environmental Assessment for the Pacific Northwest Region Aquatic Restoration Project.

The County supports the No Action Alternative.

The County appreciates the Forest Service addressing our previous concerns from November 8, 2018, but some of the responses and reasoning from the Reviewer are incomplete and/or lack specificity that addresses our concerns. Simply, while the actions listed within the PNWRARP EA may be viable in specific project sites they are not usable throughout an area of this size. A better solution would be to either divide the Plan into areas with like characteristics, or better yet, allow individual Ranger Districts to develop their own riparian solutions as part of a landscape scale forest health and resiliency project.

An excellent example of the lack of specificity is the recurring statement from the Reviewer, and still included in the Plan, is "Decommissioning non-system roads and trails in area covered by 36 CFR 212 Subpart A and B travel management decisions have been completed". The Wallowa-Whitman National Forest, portions of which are encompassed by Baker County, do not have a Travel Management Plan. We are currently under the 1990 Blue Mountains Resource Management Plan which states that our forest is "open". Therefore, all roads are considered "system roads" and any decommissioning of roads runs afoul of the Plan. In addition, Baker County has a policy of no net loss to forest access roads. (Baker County Natural Resources Plan, 2016). Roads are necessary to provide access to emergency services such as fire and medical and for public access to continue utilizing the forests in a subsistence manner.

The EA ignores science and proven methods on many fronts. However, the most blatant is the non-acceptance by the Forest Service to remove all of the juniper in a project area – riparian and upland. "The amount of juniper removal and retention will be determined at the site-specific level commensurate with the objectives of the projects." What is the objective of any riparian project if it is not to increase stream flow, promote undergrowth health, and improve riparian function? Juniper trees absorb much more water than native grasses or shrubs, and leaving them in riparian areas is not a management practice that is commonly used in the field. Tim DeBoodt (OSU Ext. Agent), probably said it best, "If we want to restore streams and fish habitat...we need to have our backs to the creek and look at the problems upslope." Once again, a reminder that the proposed Riparian Projects should be included, not separate from, upland forest resiliency and health projects.

As one of the modified categories, the County is concerned about the short amount of time for public comments and the limited engagement for notification. "Pre-project Notification, Public Review, and Forest Service Response: The notification process has been revised to include a step where the Forest Service unit sends (via email) interested parties pre-project notification reports at least 60 days prior to planned project Pacific Northwest Region Aquatic Restoration Project Environmental Assessment implementation. Further, interested parties would be allowed 20 days to provide site specific comments on project design, found in appendices 1 and 2 (Aquatic Restoration Categories, Descriptions, and Design Criteria and General and Resource Project Design Criteria), and effects to communities, species, and the environment. The responsible official may use the comments to continue, modify, or stop the project." Success of a project can be based on communication early in the development process. It is very limiting to have notifications sent via email to "interested parties" without thought to the public in general, and more specifically local citizens. A good solution would be

to, not only provide email notification, mandating that local County Commissioners have to be notified, but also articles in local media outlets. This is more inclusive to folks that do not have access to email, do not understand the notification process, or are not considered a part of a group or "interested party". In addition, and more importantly, 20 days is not enough time to provide meaningful comments. As a County, often we have to conduct research into the project, read and review multiple scientific documents to verify that Best Management Practices are being used, and conduct a site visit. The public in general are busy and require more time to put together meaningful comments. Please consider extending the number of days to 45 to provide site specific comments.

Baker County has asserted Coordination as provided through federal statutes. The "advanced notification and consultation with representatives of recreation user groups and outfitter guides for projects occurring in/around developed and dispersed sites", flies in the face of Coordination by attempting to promote decision-making authorities to groups that do not have it. The County is vehemently against allowing 'special interest' groups to have priority over duly elected government officials. No other groups or interested parties have legal authority to make any agreements on behalf of Baker County.

Thank you for the opportunity to comment and object to this Project. Baker County supports the No Action Alternative and requests that riparian projects be included in landscape scale forest health and resiliency projects.

Sincerely,



Bill Harvey, Chair  
Baker County Commission