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Robert Sanchez Forest Supervisor

Willamette National Forest

Attn: Steeple Rock Rigdon Project 3106 Pierce Parkway Suite D Springfield, OR 97477

Objection: Steeple Rock Rigdon Project

Forest Supervisor Sanchez:

In accordance with 36 C.F.R. [sect] 218, WildEarth Guardians (Guardians) respectfully submits this objection letter in response to the U.S. Forest Service's Final Environmental Assessment (EA) and Draft Decision Notice/Finding of No Significant Impact (FONSI) for the Steeple Rock Rigdon Project (Project) on the Middle Fork Ranger District of the Willamette National Forest.

Objection 1: Information Not Contained in EA

In our comments, Guardians noted that the Draft EA "does not contain any information regarding how many stands were examined within the Project area" and that the Forest Service "should disclose how many stands there are . . . how many stands were examined, and what the results of those stand exams are." Draft EA Comments at 8. Guardians also stated that information regarding how variable density thinning would be applied in Matrix and Late-Successional Reserves should be disclosed in the EA as well as post-harvest canopy conditions. Id. at 5-6. In response, the Forest Service claims that this information is too "detailed" for inclusion in the EA itself and that if the public wants to know that information, it should have to file a request to obtain it. See Final EA at 183-85. This is inaccurate.

NEPA is designed to ensure informed agency decision-making and foster meaningful public participation. See *Robertson v. Methow Valley Citizens Council*, 490 U.S. 332, 349 (1989). NEPA also requires, among other things, that the agency "make use of reliable data and resources." 42 U.S.C. [sect] 4332(E). Knowing the number of stands, how many were examined, and what the results of those exams are is directly related to the environmental analysis and needs to be disclosed within the EA. See e.g., *League of Wilderness Defenders/Blue Mountains Biodiversity Project v. Connaughton*, 3:12-cv-02271-HZ, 2014 WL 6977611, *14-19 (D. Or. Dec. 9, 2014). Without disclosure of the stand exam data in the environmental analysis documents, the Forest Service frustrates the ability of the public to meaningfully participate and ascertain whether the agency's analysis is based on reliable data and resources.

Proposed Resolution: The Forest Service should prepare a revised EA and disclose the above-referenced information in the environmental analysis documents and provide additional opportunity for public comment.

Objection 2: Post-thinning fuel treatment implementation

In our comments, Guardians requested that the Forest Service "disclose its current status of post- mechanical treatment work." Draft EA Comments at 7. In response, the Forest Service failed to provide that information but said that it "remains confident that the necessary funding will be acquired when needed for these activities to be implemented and maintained over time." Final EA at 186.

The Forest Service failed to acknowledge the agency document that Guardians obtained through FOIA that states while the Forest Service is "successful in implementing the mechanical treatment portions of projects," it

has "fallen behind in the remainder of the work, including prescribed fire." Draft EA Comments at 7. The Forest Service's claim about funding does not address what Guardians raised.

Proposed Resolution: In a revised EA, the Forest Service should disclose the current status of post- mechanical treatment work so the public can understand whether the Forest Service has "fallen behind" in this work on other projects, which is important for understanding the environmental consequences of this project.

Objection 3: Temporary Roads

In our comments, Guardians requested "updated monitoring data that demonstrates the Forest Service has, in fact, closed and rehabilitated temporary roads following implementation of past projects and the effectiveness of those rehabilitation efforts over the past decade." Draft EA Comments at 7-8. In response, the Forest Service claims this "is outside the scope of the Steeple Rock Rigdon project as it refers to the agency as a whole and not just the Steeple Rock Rigdon project." Final EA at 189. This is incorrect.

Our comment specifically referenced the lack of monitoring data on the Willamette National Forest, the specific national forest where the Steeple Rock Rigdon project is proposed. See Draft EA Comments at 7, n 45. The Willamette National Forest does not refer to "the agency as a whole." It is relevant and within the scope of this project whether the Forest Service in the Willamette National Forest can demonstrate that it follows through on closing and rehabilitating temporary roads and the effectiveness of those actions.

Proposed Resolution: In a revised EA, the Forest Service should disclose current monitoring data regarding the closure and rehabilitation of temporary roads.

Sincerely,

Ryan Talbott

Pacific Northwest Conservation Advocate WildEarth Guardians