



Via: www.fs.usda.gov/project/?project=45689

January 29, 2019

Objection Reviewing Officer
Eric Watrud, Forest Supervisor
Umatilla National Forest
72510 Coyote Rd
Pendleton, OR 97801

Re: Sunrise Vegetation and Fuels Management 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 Sunrise Vegetation and Fuels Management Project (Sunrise). The responsible official is Eric Watrud, Forest Supervisor. Sunrise occurs on the Umatilla National Forest (UNF).

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 Sunrise 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 the Sunrise Draft Environmental Assessment (DEA) which are hereby incorporated by reference.

The content of this objection below is based upon AFRC's previously submitted specific written comments regarding the proposed project that AFRC provided during scoping and in response to the draft EIS which are hereby incorporated by reference.

AFRC provides the following specific descriptions of those aspects of the proposed project resolve the objection:

1. Purpose and Need not Met: AFRC gave prior specific written comments on the proposed project that relate to this objection point in the draft EIS, "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." AFRC recognizes that wildlife habitat is the predominant land allocation in the Umatilla LRMP in the Sunrise project area, however the need for action states:
 - There is a need to reduce fuels and stand densities in order to maintain resilient forest wildlife habitat.
 - There is a need to move forest structure, species composition, and stand density toward their HRV. Additionally, there is a need to reduce forest density in some locations as reducing inter-tree competition will improve residual tree health.
 - There is a need to modify forest stands in Condition Classes 2 and 3 to begin to restore vegetation characteristics and fire return intervals characteristic of historical fire regimes and desired fire regimes.

Alternative B modified drops a number of timber harvest units totalling 1640 acres. Any reduction in treatment acres at the landscape scale compromises the value of these projects in terms of acres restored for the reasons cited above, for the cost-benefit of the Forest Service investment into the NEPA, for the raw materials produced for forest industry. Dropping these acres makes it much less likely the project will actually meet its stated purpose and need or meet the Forest's land management goals for the area.

2. Economic Viability of the Project Compromised: AFRC gave prior specific written comments on the proposed project that relate to this objection point in the draft EIS, “The timber products provided by the Forest Service are crucial to the health of our membership and local economy. Without the raw material sold by the Forest Service, these mills would be unable to produce the amount of wood products that the citizens of this country demand.” Alternative B modified will remove approximately 17,500 mbf from 6,142 acres or 2.8 mbf per acre. Alternative B, as described in the draft EIS, would remove approximately 26,500 mbf from 7,782 acres or 3.4 mbf per acre. It is important to recognize that these volume figures include nonsaw and green biomass with only a portion of the material being merchantable sawlogs. This volume per acre in Alternative B modified is not cost-effective for ground-based logging sides let alone for cable volume removal. The volume per acre in Alternative B is at about the breakeven point for ground-based logging but is insufficient for cable logging. Without sufficient volume per acre, the project will be unable to obtain timber sale revenues to support implementation, but will likely need to use a service contract and appropriated dollars, a less reliable source.

In addition to the issue of low volume per acre described above, an operating restriction would be in effect for some areas requiring a two-month operating season during the months of July and August. These two months are the height of fire season and shutdowns for fire danger are possible. AFRC provided written comments in the DEIS, “The primary issues affecting the ability of our members to feasibly deliver logs to their mills are firm operating restrictions.” Industry was not contacted for assistance in determining logging systems and roads that would provide viable alternatives to meet objectives while maintaining flexibility of operations. AFRC members have experience operating in all seasons while ensuring protection of sensitive resources.

At minimum, the seasonal restrictions should be deleted from the NEPA documentation and deferred to the implementation stage, as sale administrators and industry are well-equipped to work together to find appropriate and flexible solutions.

Resolution Requested

AFRC requests that the 1,640 acres in Alternative B as described in the EIS be added back into this project. The volume of 5.5 mbf per acre compared to the average of 2.8 mbf per acre on the currently included acres is critical for industry and for providing revenue to help pay for restoration work. AFRC requests that requirements for operating restrictions be reduced, or eliminated from the NEPA document. Working with operators on the ground to achieve desired results during the implementation stage of projects provides superior results on the ground.

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 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 written in a cursive, slightly slanted style.

Travis Joseph
President