



Via email: [objections-pnw-regional-office@fs.fed.us](mailto:objections-pnw-regional-office@fs.fed.us)

August 6, 2018

Reviewing Officer  
Pacific Northwest Region, US Forest Service  
Attn. 1570 Objections  
P.O. Box 3623  
Portland, OR 97208-3623

Re: East Hills 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 East Hills Project (East Hills). The responsible official is Barry Imler, Forest Supervisor. East Hills occurs on the Fremont-Winema National Forest (FWNF).

**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 East Hills 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 to the East Hills Draft Environmental Impact Statement (DEIS) which are hereby incorporated by reference.

AFRC requested in the DEIS that the FWNF 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 East Hills Draft Record of Decision (DROD) the purpose and need is presented on page 3. A list of 16 “needs” is presented with the last one listed as “provide forest products as a by-product of meeting the above objectives.” 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,” not merely a place for “by-product.” This is direction from the NFMA and the Organic Act, and a purpose and need that ignores the agency’s statutory mandate is arbitrary and capricious. *See Citizens Against Burlington, Inc. v. Busey*, 938 F.2d 190, 196 (D.C. Cir. 1991).

The forest products industry provides both the vehicle and many of the funds to help restore these landscapes as well as providing essential support to local economies. The City of Prineville and the Ochoco Forest Restoration Collaborative are currently in the process of reestablishing a mill in central Oregon. Local markets for materials removed from the Ochoco National Forest are not available and transportation costs to other areas are high. Milling and processing infrastructure costs millions of dollars and is very difficult to get back once it is lost. The FWNF must better recognize the importance of the local forest products infrastructure by emphasizing the role of industry beyond just a facility to take the “by- products” of the East Hills project.

AFRC objects to leaving all trees that “appear mature and old – generally over 150 years in age.” There is no requirement to do this in the FWNF Forest Plan. Throughout the project area, ponderosa pine must be removed across all age classes and diameters. The East Hills project does not manage for the “maximum benefits of multiple use sustained yield management” as required by the National Forest Management Act, 16 U.S.C. § 1601(d)(1).

AFRC objects to the silviculture prescriptions in dry and moist lodgepole pine. Lodgepole pine has evolved do to stand replacing events and some effort at simulating that ecology must be implemented in East Hills.

AFRC objects to “skips” within commercial thinning units. The individual, clumps and openings (ICOs) will develop naturally in a relatively short amount of time without the “over engineering” that is currently taking place with extremely complex marking guides.

AFRC objects to leaving large and old conifer trees in dry meadows and aspen/hardwood/shrub restoration areas. Historically these species were generally not present and their continued presence, regardless of age and size, provides a seed source and proliferates the current problem.

### **Resolution Requested**

AFRC requests that the FWNF modify Alternative 2 by revising the purpose and need to clearly articulate the critical nature of retaining the current forest industry infrastructure; by creating patch cuts with irregular edges that blend in with the topography and are a minimum of five acres in size in green lodgepole stands; by not deferring units or setting aside portions of units for “skips” and by removing all conifers from dry meadows and aspen/hardwood/shrub restoration areas.

### **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 this project, for the streamlined and concise DROD 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, flowing style.

Travis Joseph  
President