



Via E-mail: [objections-pnw-colville@fs.fed.us](mailto:objections-pnw-colville@fs.fed.us)

September 11, 2018

Forest Supervisor  
Objection Reviewing Officer  
Attn: Objections  
765 South Main  
Colville, WA 99114

Re: Orient Watershed Project

Pursuant to 36 C.F.R. Part 218, the American Forest Resource Council (AFRC) files this objection to the proposed decision for Orient Watershed Project. The responsible official is Joshua White. The Orient Watershed project occurs on the Colville National Forest.

**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 Orient Watershed 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**

Tom Partin  
AFRC Consultant  
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503-704-4644

5100 S.W. Macadam Avenue, Suite 350  
Portland, Oregon 97239  
Tel. (503) 222-9505 • Fax (503) 222-3255

## Reasons for the Objection

The project area includes about 14,200 acres of National Forest System land west of the community of Orient. The project area is a designated wildland-urban interface (WUI) in the Ferry County community wildfire protection plan (CWPP). The community of Orient and the surrounding area is primarily dependent on surface runoff from East Deer Creek Watershed for their water resources. A severe wildfire in this watershed could cause serious injury to this resource. Fuel reduction treatments prior to a fire event are a high priority and are imperative to conserving the functionality of the watershed following a wildland fire. AFRC does not believe the Forest has taken responsible steps to reduce the fuel loadings thus preventing wildfire and protecting the Orient watershed.

The content of this objection below is based upon the prior specific written comments submitted by AFRC on May 12, 2018 in response to the draft EA. Many of the recommendations and requests for change in that document were not incorporated into the Final Record of Decision, thus prompting this objection.

Since the proposed alternative will only treat 3,400 acres commercially out of the 14,200 acres in the project planning area, and of that, 440 acres are dead tree biomass, AFRC does not believe the Forest is meeting the purpose and need for this project which is:

- *Reducing hazardous fuels*
- *Improve forest health and resilience to disturbance*
- *Support high quality water*

1. AFRC supports treating more acres commercially to decrease fire risk in the wildland urban interface and to maintain and improve water quality. Severe fires are a real threat. During the summer of 2015 two fires burned within the project area. The North Boulder 2 fire burned about 230 acres in late July with low to moderate severity. The Stickpin Fire was a large fire (about 54,000 acres) that burned into the watershed in August. The Stickpin Fire burned about 4,200 acres of the western portion of the project area.

The Orient Watershed project is also eligible as an authorized hazardous fuels reduction project as defined in the Healthy Forest Restoration Act of 2003 (HFRA) Section 102 (16 USC 6512) because it is on Federal land in WUI areas; it includes fire regime condition classes 2 and 3 on Federal land; is located within fire regimes 1, 2 and 3; is located in proximity to Orient's water supply infrastructure and East Deer Creek, which feeds into this water supply system; and a significant risk exists that a fire disturbance event would have adverse effects on the water quality of Orient's water supply. These facts further support the treatment of more acres in the project area.

2. The Forest did not accept AFRC's request that maintaining existing infrastructure should be part of the purpose and need for this project. AFRC has several members that depend on timber from the Colville National Forest for their resource needs. The timber products provided by the Forest Service are crucial to the health of our membership. 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. Without this material, our members

would also be unable to run their mills at capacities that keep their employees working, which is crucial to the health of the communities that they operate in. These benefits can only be realized if the Forest Service sells their timber products through sales that are economically viable. This viability is tied to both the volume and type of timber products sold and the manner in which these products are permitted to be delivered from the forest to the mills. There are many ways to design a timber sale that allows a purchaser the ability to deliver logs to their mill in an efficient manner while also adhering to the necessary practices that are designed to protect the environmental resources present on Forest Service forestland. AFRC members take a variety of log types and sizes. The Orient Project has a diverse group of age classes and timber types that should be managed to provide the variety of wood needed by AFRC member sawmills.

3. AFRC recommended another alternative which would include doing some work in the Deer Creek Potential Wilderness Area (PWA). We believe that work could be done while protecting the water diversion used by the community of Orient. This alternative which the Forest studied, included all of the elements of the proposed action along with an additional 2,500 acres of commercial vegetation treatments and fuel treatments, eight miles of new temporary roads, and three miles of reconstruction of non-system road templates. It was decided that this alternative would conflict with the objective relating to water quality because it would include new road construction with stream crossings that could increase sediment delivery to East Deer Creek. AFRC encouraged the Forest to analyze another alternative which would have included putting the PWA into the Orient Project to treat more of the landscape and make the project more economical. AFRC did not believe that conducting treatments in the PWA was an all or nothing option, but that is what the Forest chose.
  
4. AFRC does not believe the Forest is accomplishing its goal of significantly reducing the potential fire severity class and reducing the forest density class. Table 4 below points out that the moderately severe fuel loadings would only be reduced from 55% to 40%. The High forest density class is only reduced from 59% to 33%. AFRC believes more commercial mechanical work is needed to further reduce these numbers to accomplish the stated purpose and need.

Table 4. Summary of how the proposed action addresses the purpose and need.

Purpose and Need	Indicator	Measure (percent of analysis area)	Existing Condition Year 2020	Proposed Action Year 2020	Change from Existing Condition
Reduce hazardous fuels	Potential fire severity class	Low	22%	36%	+14
		Moderate	23%	25%	+ 2
		Moderately Severe	55%	40%	- 15
		Severe	0%	0%	0
Improve forest health and resilience to disturbance	Forest density class	Low	31%	54%	+23
		Medium	10%	13%	+ 3
		High	59%	33%	- 26

## **Resolution Requested**

To resolve this objection, the following actions will need to occur.

1. The Forest needs to treat more acres commercially to decrease fire risk in the Wildland Urban Interface and to maintain and improve water quality as stated in the purpose and need of this project. This could have easily been done since the project was analyzed using HFRA guidelines.
2. The Forest did not consider the importance of the local infrastructure and their needs for raw material when planning this project. Acres that were once analyzed for management need to be included in the final implementation.
3. AFRC believes that some treatments should be done in the PWA to reduce fuel loadings and reduce fire threat. Concerned citizens raised issues such as hazardous fuels and forest health conditions in the Deer Creek PWA. While the Forest analyzed an alternative that would treat an additional 2,500 acres of commercial vegetation, the entire acreage was dropped.
4. AFRC believes that more acres should be commercially treated to effectively reduce the fire severity classes and forest density within the project area. AFRC does not believe the Forest is achieving the purpose and need which is to *“Improve forest health and resilience to disturbance.”*

## **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, Tom Partin, at the address and phone number shown above, to arrange a date for the resolution meeting.

Sincerely,



Travis Joseph  
President