



Via email: <https://cara.ecosystem-management.org/Public//CommentInput?Project=45207>

November 5, 2018

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

Re: Willoughby Urban Interface Protection 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 Willoughby Urban Interface Protection Project (Willoughby Project). The responsible official is Eric Watrud, Forest Supervisor. The Willoughby Project occurs on the Umatilla National Forest (UNF).

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 Willoughby 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.

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

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

AFRC requested in the DEA that the UNF 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 Willoughby Final Environmental Assessment (EA), the purpose and need is presented on page 2. The purpose and need has not been modified to include **“economic viability & support to the local infrastructure.”** 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,” on any project that removes commercial material regardless of the primary purpose. The forest products industry provides both the vehicle and many of the funds to help reduce the fuels in wildland urban interface areas 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 the central Oregon area. 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 UNF must better recognize the importance of the local forest products infrastructure by emphasizing the role industry plays in fuels reduction and potential removal to provide some economic return.

AFRC objects to leaving all trees that are greater than 21 inches at diameter breast height (dbh), especially white fir and spruce that may be decadent and or diseased. These types of trees often create serious safety issues and hazardous conditions for firefighters and timber fallers during wildfire events. AFRC also questions whether fuel reduction needs can adequately be met by leaving these trees. In particular, we believe that this limitation is inconsistent with two of the stated “Needs” described on page 2 of the EA. These are:

- Reduce and thin surface, ladder, and crown fuels to reduce the probability of surface fire transitioning to crown fire and generating embers that can drift, land and ignite spot fires.
- Treat crown fuels to reduce the potential for spread of fire through the crowns once fire reaches the crowns from the surface.

We believe that implementation of this design feature will ultimately retard the UNF 's ability to meet this Need.

AFRC objects to the limited thinning in Riparian Habitat Conservation Areas (RHCAs). Limited small diameter hand thinning coupled with prescribed burning will not adequately reduce fuels in the RHCAs to meet the purpose and need of the Willoughby Project.

Resolution Requested

AFRC requests that the UNF modify Alternative 2 by revising the purpose and need to clearly articulate the critical nature of retaining the current forest industry infrastructure by adding “**economic viability & support to the local infrastructure**” to the purpose and need of the project; by removing the limitation of harvesting trees greater than 21 inches at dbh; and by more aggressively treating RHCAs.

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 the Willoughby Project and for 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