



Via: <https://cara.ecosystem-management.org/Public//CommentInput?Project=50471>

January 22, 2019

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

Re: Glass Restoration 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 Glass Restoration Project (Glass). The responsible official is Eric Watrud, Forest Supervisor. Glass 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 Glass 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

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

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

1. Insufficient forest acres treated

The Glass planning area is 28,270 acres. Alternative 1, the proposed action, will implement commercial and noncommercial treatments, including riparian areas, on 4,487 acres or approximately 16 percent of the project area. The limited number of acres proposed to be treated is too low to meet the purpose “improve landscape resiliency and restore functions and processes in upland forest by moving the landscape’s vegetation toward Historic Range of Variation (HRV) in forest structure, density, and species composition” in a meaningful way.

Additionally, the small number of acres treated imperils the economic viability of timber sales to implement the project. Without an economically viable sale, the Forest Service will have to await appropriated funds to tackle landscape improvements.

2. Plantation treatments only

Only plantations are proposed for treatment in the Glass project which does not meet the need to “decrease multi-strata forest.” While AFRC supports collaboration, particularly where groups work together in good faith to find a project that works for everyone, we are concerned that the Forest Service, in this instance, has allowed collaboration to lead to a lowest-common-denominator outcome. Treating plantations does not deliver results for communities, the landscape, or for collaboration.

3. Insufficient acres and treatments in RHCAs

As identified, a significant driving factor of the purpose and need for the Glass project is to reduce “off-site” ponderosa pine in the planning area, including riparian areas. “The objectives of small diameter thinning in the off-site poor health ponderosa pine plantations proposed for treatment in Class III riparian areas are to restore cool moist riparian Grand Fir plant associations. The dominant riparian plant association is Mountain Alder/Lady Fern/Grand Fir. The objectives of thinning in Class IV upland mapped riparian areas, in ecologically drier small headwater channels, is to restore scrub-shrub and hardwood and forest communities where ecologically appropriate. This would include riparian plant association such as cottonwood/alder.” (Glass EA, page 2-101). However, in Class IV Category 4 streams, commercial thinning of off-site pine will retain a minimum of 16 trees 12-17” diameter per acre within 15-75’ of RHCA and in Class III Category 2 streams only off-site pine less than 10” would be removed by hand thinning to meet riparian plant association objectives. If restoring grand fir and appropriate riparian shrub and hardwood species to these streams is critical, the acres treated and the limitation on diameter do not meet the purpose and need.

4. Project design criteria in body of the EA

Management requirements, project design features, and best management practices common to all alternatives are in the body of the EA. These criteria are standard best management practices and are required on all contracts and fully described therein and are not appropriate in the body of the EA. They should be deleted to make for a more readable and informative document, as NEPA intends.

Resolution Requested

AFRC requests that the UNF modify Alternative 2 by treating acres in all previously managed stands; by more aggressively and appropriately treating all RHCAs; and by moving project design criteria to the appendices of the EA.

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 Glass 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, slightly slanted style.

Travis Joseph
President