



VIA email submission: objections-pnw-umpqua@fs.fed.us

May 1, 2018

Forest Supervisor, Reviewing Officer
Umpqua National Forest
2900 NW Stewart Parkway
Roseburg, OR 97471

RE: Calapooya Divide Environmental Assessment Objection

Pursuant to 36 C.F.R. Part 218.7, the American Forest Resource Council (AFRC) files this objection to the proposed draft decision for the Calapooya Divide Environmental Assessment. Cottage Grove District Ranger Kimberly Briggs is the responsible official. The Calapooya Divide project occurs on the Cottage Grove Ranger District on the Umpqua 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 Calapooya Divide 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

Andy Geissler, Western Oregon Field Forester
2300 Oakmont Way, Suite 205
Eugene, OR 97401
ageissler@amforest.org

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

Reasons for the Objection

The content of this objection below is based upon the prior specific written comments submitted by AFRC in response to the Draft EA which are hereby incorporated by reference.

Alternative 3 as described in the Final EA does not meet numerous components of the Purpose & Need of the project and incorporation of any of its elements in the final decision would retard the attainment of certain resource objectives that are identified in the Purpose & Need.

The Purpose & Need as it appears in the Final EA includes the following:

“Improve stand growth, health, and diversity”

“Improve fire resiliency and create opportunities to manage wildfires that threaten values at risk”

“Provide forest products in an economically viable manner”

In AFRC’s opinion, the goal of any Forest Service vegetation management project should be to meet the stated project objectives to the maximum extent across as many acres of the project area as possible. The scope, measured in acres treated for this project, should be the metric that indicates how well the Forest Service is meeting its stated objectives on any given project. In other words, meeting the stated Purpose and Need on 600 acres is better than meeting the stated Purpose and Need on 500 acres.

In our EA comments, we expressed concern regarding the reduced scope of the project as analyzed under Alternative 3 and how that reduced scope would affect the attainment of the Purpose and Need. In particular, we stressed the importance of a product that was economically viable. This viability is tied to both the design of the project and the products generated. This concern was addressed in the Purpose and Need as a need for a “provision of forest products in an economically viable manner.” Our EA comments stated that: ... ***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.***

Economic viability is partly a function of treatment acres, which is directly linked to volume. Generally, the fewer acres treated in any given project the less economically viable that timber sale will be; it’s a matter of efficiency. For example, a logger who can move into an area and extract timber off 500 acres will be more efficient, and therefore more economically successful, than on a sale that only treats 200 acres. The level of harvest proposed in Alternative 2 represents a small portion of the planning area (7%). Any further reduction in this type of

treatment acreage (i.e. incorporation of the reduced harvest component of Alternative 3) will further reduce the economic viability facet of the project's Purpose and Need.

In our written scoping comments, we urged the District to maximize treatments that would address the aforementioned Purpose and Need component of improving stand growth, health and diversity. In particular, we stressed the importance of creating vertical and horizontal diversity within forest stands. One aspect of our comments was couched in our description of the value of a sustainable timber supply supported by a forest with multiple age classes made possible by the creation of forest openings large enough to support early seral habitat for Douglas-fir: ***The “thinning-only” management paradigm adopted by the Umpqua National Forest since the NWFP was signed has provided a short-term supply of timber products, but unfortunately cannot fulfill the sustained long-term supply that we believe the Forest Service is mandated to provide; in other words, the stands suitable for thinning will eventually be depleted. Douglas-fir forests require regeneration harvest at some point in their life-cycle to regenerate. Since the Umpqua has made it clear to us that regeneration harvest will not likely be part of the Forest’s management paradigm in the near future, we have shifted our requests toward a management design that implements small gap-cuts or group-openings that have the potential to provide for the establishment of a young cohort of Douglas-fir forests.*** Here, we saw an opportunity to achieve both diversity objectives and sustainable timber management objectives with the same treatments. Our request was not incorporated into the action alternatives for the Calapooya Divide project. Alternative 2 proposes a miniscule 5 acres in gaps for 695 acres of thinning, plus 294 acres in skips. This disproportionate skip:gap:thinning ratio is a far cry from a project that truly diversifies the stands being treated. We urge the Forest to not reduce the attainment of this diversity objective any further by incorporating any elements of Alternative 3, which creates fewer gaps and thins fewer acres.

It is generally accepted by most in the scientific community as well as among practicing foresters that variable density thinning treatments are effective in improving stand growth and diversity in uniform forest stands. Compared to Alternative 2, Alternative 3 reduces the acreage, and thus the level of attainment of the purpose and need, for both thinning harvest treatments in the uplands (206 acres less) and in the riparian reserves (19.8 acres less). This reduction is due primarily to the genesis of Alternative 3, which was not the scientific literature but rather public comments that requested no treatments in either “fire regenerated stands” or “stands over 80 years of age.” In our EA comments we urged the District to avoid making vegetation management decisions based on arbitrary thresholds (i.e. stand age, stand origin) as doing so would retard attainment of forest health objective: ***AFRC supports vegetation management treatments based on actual stand conditions. AFRC does not support vegetation management treatments, or lack of treatments, based on arbitrary elements such as stand age.***

Alternative 3 was essentially developed based on arbitrary thresholds rather than on actual stand conditions. These arbitrary thresholds are inconsistent with the NWFP land allocations and the Plan standards and guidelines. They import restrictions into Matrix or General Forest management areas from other land allocations. Since the Purpose and Need focuses on end-results based on the outcomes of vegetation management treatments of stands with specific stand attributes, Alternative 3 falls short of meeting this purpose and need on nearly every aspect. It also is inconsistent with the NWFP and the Umpqua Forest Plan.

Resolution Requested

AFRC requests that the Deciding Official not incorporate any elements of Alternative 3 into the selected alternative. As the current decision is a draft decision, potential exists for both the reduction of the level of acres treated and the intensity of those treatments that would compromise the forest health and diversity objectives described in the Purpose and Need.

Request for Resolution Meeting

Pursuant to 36 C.F.R. § 218.11, the objectors request to meet 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 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, Andy Geissler, at the address and phone number shown above, to arrange a date for the resolution meeting.

Sincerely,



Travis Joseph
President