



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

January 22, 2019

Richard Periman, Forest Supervisor  
Objection Reviewing Officer  
Mt. Hood National Forest  
16400 Champion Way  
Sandy OR 97055

Re: Rocky Restoration Project

Pursuant to 36 C.F.R. Part 218, the American Forest Resource Council (AFRC) files this objection to the proposed decision for the Rocky Restoration Project. The responsible official is Richard Periman, Forest Supervisor. The Rocky Restoration project occurs on the Mt. Hood 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 Rocky Restoration 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  
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## **Reasons for the Objection**

The content of this objection below is based upon the prior specific written comments submitted by AFRC on October 17, 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.

### **1. AFRC does not believe certain PDCs incorporated into the EA are supported by the analysis**

AFRC commented on the Project Design Criteria (PDC) outlined on page 19 of the EA that restricts ground-based equipment within 100 feet of streams. The EA described this PDC's purpose specifically to "reduce the chance of sediment delivery to surface water." In AFRC's written comments in response to the EA publication, we questioned the justification for this PDC as a necessary precaution against the described "sediment delivery to surface water" as the very next PDC restricts ground based skidding in any riparian reserve during the fall, winter, and spring months, which are those months when expected rainfall would occur and pose a risk of sediment delivery.

In the Response to Comments section of this EA, the Forest Service responded to this comment by saying that "the seasonal restriction PDC is prescribed to minimize ground impacts to riparian soils." However, this is not what is written in the EA. Rather, the EA states that this PDC is in place specifically to avoid sediment delivery.

Assuming this PDC *is* in place to protect soil impacts, we could not locate any discussion in the EA that would warrant the need for additional precautionary measures to meet Forest Plan guidelines for soil resource protection. In fact, page 53 of the EA states that "all soils within the planned treatment areas have a low to moderate compaction risk due to inherent soil properties."

### **2. AFRC is concerned with the economic viability of this project and urges the District to not exacerbate this viability by incorporating any component of the no-action alternative.**

AFRC commented at length about our concerns regarding the marginal nature of the timber products potentially being offered for sale from this project. This concern stems from a combination of the volume per acre, mean diameter, and tree species described in the EA and confirmed from our site visits. We appreciate the described purpose & need in the EA and the contribution that treating these marginal stands will have towards it. However, since the published Decision Notice is a Draft, incorporation of elements of the no-action alternative that would reduce the proposed acreage is still possible. If reductions to treatments, deferrals in acreage (particularly from those higher value treatment units), or deferrals in necessary road maintenance/construction were incorporated, the economic viability would be degraded further and the Forest Service's ability to meet the purpose & need element of "Providing forest products consistent with the Northwest Forest Plan goal of maintaining the stability of local regional economies" would be compromised.

## **Resolution Requested**

Ultimately, AFRC would like to see the Forest Service impose PDCs based on site-specific resource needs. The 100-foot ground-based restriction appears to not be based on site-specific resource needs nor does it appear to have been developed with consideration of additional PDCs already in place.

**We would like the Forest Service to either remove this PDC or provide site-specific information of the resources at risk that necessitate this restrictions incorporation into the final decision.**

The economic viability of this project and the subsequent sales generated from it are of critical importance to our membership, the communities they help support, and to the products they manufacture for the public who depend on them.

**In order to not exacerbate the challenges surrounding the economic viability of this project, we would like the Forest Service to not incorporate any design elements of the no-action alternative into the final decision.**

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

Sincerely,



Travis Joseph  
President