



VIA: <https://cara.ecosystem-management.org/Public/CommentInput?project=53520>

May 21, 2019

Tracy Beck, Forest Supervisor  
Willamette National Forest  
3106 Pierce Parkway, Suite D  
Springfield OR, 97477

RE: Calapooia Environmental Assessment Statement Objection

Pursuant to 36 C.F.R. Part 218.7, the American Forest Resource Council files this objection to the proposed draft decision for the Calapooia Project Environmental Assessment. Sweet Home District Ranger Nicola Swanson is the responsible official. The Calapooia project occurs on the Sweet Home Ranger District on the Willamette National Forest.

**Objector**

American Forest Resource Council  
700 NE Multnomah, Suite 320  
Portland, Oregon 97232  
(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 Calapooia 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, Federal Timber Program Manager  
2300 Oakmont Way, Suite 205  
Eugene, OR 97401  
541-342-1892  
[ageissler@amforest.org](mailto:ageissler@amforest.org)

## **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.

**The “No Action” alternative of the Final EA does not meet the purpose & need of the project and incorporation of any of its elements would retard the attainment of the resource objectives that are identified in the Purpose & Need.**

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

*“Contribute to a predictable, sustainable supply of timber and other forest products to help maintain the stability of local and regional economies”*

*“Enhance stand health, vigor, species diversity, and structural complexity”*

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 & Need on 500 acres is inferior to meeting the stated Purpose & Need on 600 acres.

In our EA comments, we expressed concern regarding the manner in which the Willamette National Forest has been managing its timber resources pertaining to sustainability. We noted that “Since the inception of the Northwest Forest Plan (NWFP) the Willamette National Forest has largely abandoned any level of regeneration harvest. This sustainability is crucially important to AFRC’s members and we continuously advocate for forest management that addresses it. The “thinning-only” management paradigm adopted by the Willamette 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.”

We also applauded the Calapooia project in our comments: “It is refreshing to see some level of regeneration harvest (through gap cuts and DTRs) proposed on the Calapooia project and we urge the District to fully implement these treatments as described in the proposed alternative that considers this silvicultural practice.”

Ultimately, we believe that full implementation of the acres in the Draft Decision Notice is the only way to best meet the Purpose and Need and to maximize its attainment; particularly the portion of the Purpose and Need that addresses a “*sustainable supply of timber*” and that any incorporation of elements of the No-Action alternative would retard this attainment.

**Resolution Requested**

AFRC requests that the Deciding Official not incorporate any elements of the No Action alternative 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 stated.

**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,

A handwritten signature in black ink, appearing to read "Travis Joseph". The signature is written in a cursive, flowing style.

Travis Joseph  
President