



VIA <https://cara.ecosystem-management.org/Public/CommentInput?project=52868>

May 22, 2019

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

RE: Lowell Country 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 Lowell Country Project Environmental Assessment. Middlefork District Ranger Duane Bishop is the responsible official. The Lowell Country project occurs on the Middlefork 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 Lowell Country 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

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 rationale provided to justify the decommissioning of the 1821198 road is inconsistent with the Purpose and Need.

The Purpose and Need in the EA that applies to road management reads: *Identify the minimum road system needed for safe and efficient travel, and for administration, utilization, and protection of National Forest System Lands. The minimum system is the road system that reflects long-term funding expectations, that minimizes adverse environmental impacts associated with roads, and that meets public and administrative access needs.*

Attachment C, Road by Road Rationale, provided with the Decision documents provides a detailed list of each road segment analyzed, its proposed management recommendation, and the rationale for that designation. To be consistent with the Purpose and Need, the rationale listed for any road proposed for decommissioning should correspond to the factors listed in it; this includes long-term funding expectations, adverse environmental impact minimization, and public/administrative access needs. Before proceeding to decommission any roads, the Forest Service must establish that the road is truly unnecessary to meet management objectives.

The rationale listed for road segment 1821198 is “older stand, aquatic risk.” AFRC believes that only the aquatic risk factor is consistent with the Purpose and Need as it applies to potential adverse environmental impacts. However, the rationale of “older stand” bears no reflection to the Purpose and Need. There is no reason that a stand being “older” would not need access for multiple reasons.

AFRC submitted written comments in response to the Draft EA and addressed our concerns with road management in those written comments. Those comments urged the District to “clearly provide sufficient rationale to justify any road decommissioning” and to base that rationale on whether “the resource risk from these roads potentially outweighs the access value.” This rationale is consistent with how the IDT framed the Purpose and Need.

This rationale is also consistent with the language in the 2015 Road Investment Strategy. The RIS directs the agency to analyze roads for decommissioning where “*the resource risk from these roads potentially outweighs the access value and the road is very unlikely to be needed for administrative use in the future.*” The Strategy also directs the agency to analyze roads for closure where “*the resource risk from these roads potentially outweighs the access value, but the road may be needed for administrative use in the future.*”

Alternative 3 of the Final EA does not meet the Purpose and 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 and Need as they relate to road management.

The Purpose and Need relevant to road management is listed above. We believe that the development of Alternative 3 was not based on maximizing the attainment of the Purpose and Need but instead was developed in an arbitrary manner.

In our written comments to the Draft EA, we expressed concern with how Alternative 3 was developed and questioned whether that development was based on attainment of the Purpose and Need. We stated that “the elevated level of road decommissioning identified in Alternative 3 seems to be derived from a very random and questionable manner. The EA states that this level of decommissioning was derived by simply converting the designations completed in the RIS to a different designation in the LSRs.”

We do not believe that the current land allocation should be a factor considered for determining how a road segment is managed. Nor do we believe that current land allocations are applicable to anything written in the Purpose and Need, such as how the road system *reflects long-term funding expectations, that minimizes adverse environmental impacts associated with roads, and that meets public and administrative access needs*. Simply because a road is located in a late-successional reserve does not mean that that road is causing “adverse environmental impacts” or that that road does not support “public and administrative access needs.”

Ultimately, Alternative 3 applies an extremely broad brush to road management across thousands of acres of Forest Service land, does not meet the Purpose and Need of the project, and should not be incorporated into this Decision.

Resolution Requested

AFRC requests that the Deciding Official clarify the rationale for the decommissioning of road segment 1821198 and to remove the rationale of “older stand” from Attachment C.

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 such an incorporation.

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 with a prominent initial "T".

Travis Joseph
President