



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

January 30, 2020

Alice Carlton, Forest Supervisor
Umpqua National Forest
2900 NW Stewart Parkway
Roseburg, OR 97471

RE: Skilleam Integrated Resource Restoration Project Environmental Assessment 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 Skilleam Integrated Resource Restoration Project Environmental Assessment. Tiller District Ranger, Kathleen Minor, is the responsible official. The Skilleam Integrated Resource Restoration Project occurs on the Tiller Ranger District on the Umpqua 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 Skilleam Integrated Resource 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

Amanda Astor, Southwestern Oregon Field Forester
2300 Oakmont Way, Suite 205
Eugene, OR 97401
aastor@amforest.org
(541) 342-1892

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 Scoping Notice and Draft EA which are hereby incorporated by reference.

1) Because the inaction described in Alternative 1 (No Action) does not meet numerous components of the Purpose & Need of the project, incorporation of any of its elements would retard the attainment of certain resource objectives that are identified in the Purpose & Need.

The Purpose & Need as it appears in the Draft Decision Notice and Finding of No Significant Impact includes the following:

- *Improve Water Quality and Aquatic Habitat*
- *Improve Forest Health*
- *Reduce Susceptibility to Catastrophic Wildfire*

AFRC is primarily focused on improving overall forest health through timber management which leads to improved water quality, aquatic habitat, and reduced susceptibility to catastrophic wildfire. 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 indicators by which this Purpose & Need is measured are acres of forest thinned, older plantations thinning in the subwatershed, and residual relative stand density index. We believe acres treated is the appropriate means by which to measure the project's ability to meet the Purpose & Need. For example, meeting the stated Purpose & Need on 500 acres is inferior to meeting the stated Purpose & Need on 600 acres. Ultimately, we believe that full implementation of the acres in the Draft Decision Notice is the only way to best meet the Purpose & Need and to maximize its attainment. Thus, AFRC and our members believe that any reductions in treatment from the proposed 646 acres of commercial thinning, including at least 11 acres that will be commercially thinned for shaded fuel breaks, will retard attainment of the Purpose & Need. We expressed this correlation between acres treated and attainment of project objectives clearly in our scoping and EA comments: "The consideration of active management on every acre of appropriate land, regardless of its land allocation, is important to our membership as each year's timber sale program is a function of the treatment of aggregate forested stands across the landscape."

In our EA comments, we identified additional acres in the project area that should be treated to further meet the Purpose & Need of this project. The Decision Notice Appendix A – Response to Comments, states that "maximizing commercial thinning opportunities is not a project goal" of the Skilleen Project and as such Alternative A was not analyzed in detail nor were the additional stands AFRC diligently field visited and identified in our Scoping and EA comments, included in the Draft Decision for the project. First, we are confused with the Forest Service's rationale that maximizing thinning acres is not a project goal. The project goal, as described on page 4 of the EA, is to "improve forest health." Page 4 also states that "the ability of the proposed action and alternatives to meet this need will be measured by the following indicators: 1) acres of forest thinned." So, it seems clear to us, based on the EA language written by the Forest Service, that

increasing thinning opportunities is directly correlated to meeting project goals. The stands AFRC identified for inclusion into the project were very similar to those stands already included in the project and thus also have the need for improved forest health. Their unhealthy state also made them prime candidates for management to meet the Purpose & Need of reduced susceptibility to catastrophic wildfire. Inclusion of these stands would certainly align with meeting the project goals. Disregarding our request to increase meaningful treatment on the landscape in this project clearly reduces the level of attainment of the project objectives. As such, by including any part of Alternative 1 (No Action), the project will be further away from attainment of the Purpose & Need of the project.

Resolution Requested

AFRC requests that the Deciding Official not incorporate any elements of Alternative 1 (No Action) 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, Amanda Astor, 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 fluid and cursive, with the first name "Travis" and last name "Joseph" clearly distinguishable.

Travis Joseph
AFRC President