



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

June 3, 2020

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

Re: Calf-Copeland Restoration Project Final Environmental Impact Statement 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 Calf-Copeland Restoration Project Final Environmental Impact Statement (FEIS). North Umpqua District Ranger, Sherri Chambers, is the responsible official. The Calf-Copeland Restoration Project (Calf-Copeland) occurs on the North Umpqua Ranger District on the Umpqua National Forest (the Umpqua).

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. Calf-Copeland 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 EIS which are hereby incorporated by reference.

1) Because Alternative 4 best meets the Purpose and Need of the Project, the Responsible Official should amend the Draft Record of Decision to select Alternative 4.

The Purpose and Need, as it appears in the Draft Record of Decision, includes the following:

- *Provide greater landscape resiliency to wildfire and other disturbances*
- *Restore the health and vigor of sugar and ponderosa pine*
- *Provide conditions for better protection of life and property within the Wildland Urban Interface*
- *Restore watershed conditions within the planning area*

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 and Need should at least be measured in acres of forest restored and miles of improved access for firefighting. We believe these measures are the appropriate means by which to measure the project's ability to meet the Purpose and Need. For example, meeting the stated Purpose and Need on 500 acres and 100 miles is inferior to meeting the stated Purpose and Need on 600 acres and 150 miles. **Ultimately, we believe that full implementation of the acres and road access in the Final Record of Decision is the only way to best meet the Purpose and Need and to maximize its attainment.** AFRC has explicitly made this request in our scoping and Draft EIS comments.

The differences between Alternative 4 and Alternative 3 (the selected Alternative) lie in the road system. Alternative 3 has additionally eliminated stream crossings, miles of decommissioned or stored roads, miles of closed or stored roads, fewer miles of road available for fire initial attack, and fewer miles of road that would be available for future land management activities (i.e., 31 road stream crossings eliminated, 5.4 Miles of road within Riparian Reserve decommissioned or put in storage, 1.7 Miles of road currently designated as open to all vehicles decommissioned, 0.2 Miles of road currently designated as motorized trail closed and placed in storage, 10.8 Miles of road currently designated as open to all vehicles closed and placed into storage, 1.3 Miles of road currently designated as open to all vehicles changed to motorized trail, 1.7 less Miles of road available for fire initial attack and road that would be available for future land management activities). **Although these activities do occur in Alternative 4, they occur to a lesser degree.**

Eliminating stream crossings, decommissioning roads, and placing roads in storage moves the Project Area further from two of the objectives in the Purpose and Need while marginally improving one. Landscape resiliency to fire and fire suppression effectiveness will suffer with decreased access to the Project Area (the first and third Purpose and Need listed above). Temporary road closure is a viable alternative to full decommissioning. Doing so would address any resource risks due to road condition while maintaining access to the Project Area.

Watershed conditions can be explained through numerous metrics. Watershed conditions are most improved through maintaining a healthy, vigorous and fire resilient landscape. The miles of road and number of stream crossings does not adequately explain whether or not watershed conditions would be improved with their elimination. AFRC would rather see improvement of road drainage or culvert replacement to minimize sediment runoff.

Other than the Purpose and Need to restore watershed conditions, there is no direct link for increasing the number of eliminated stream crossings, road decommissioning, or road storage to the Purpose and Need of Calf-Copeland. The proposed level of road decommissioning in Alternative 3 will ultimately result in 1.7 fewer miles of roads that would support active management and fire suppression activities. Both of these actions will hinder the attainment of the Project's Purpose and Need when compared to Alternative 4.

Resolution Requested

AFRC requests that the Responsible Official amend the Draft Record of Decision to implement Alternative 4 rather than Alternative 3.

2) The incorporation of firm limits on post-treatment canopy cover will likely retard the attainment of the Purpose and Need.

The objective of landscape resiliency to wildfire cannot be realized without the development of site-specific silvicultural prescriptions. The Purpose and Need includes restoration of the health and vigor of sugar and ponderosa pine. Adaptive prescriptions must be utilized to achieve this Purpose and Need and, therefore, silvicultural treatments must be adaptable to each unique stand in the Calf-Copeland Project. The firm canopy cover limits will retard the ability to realize this Purpose and Need element effectively. Due to the necessity of the silvicultural prescriptions to achieve the Purpose and Need of Calf-Copeland, the prescriptions must be formulated on a site-by-site basis. The Forest has instead chosen to utilize canopy cover as a metric for treatment.

Resolution Requested

AFRC requests that the arbitrary canopy cover restriction be removed, and site-specific conditions should drive the prescription to meet the desired outcome analyzed in the FEIS.

3) The economic analysis is inadequate due to items being left out of the analysis.

AFRC agrees that timber production is not an objective in LSR nor this Project, but in order to implement any of the restoration and fuels reduction work, the Project must be economically and operationally feasible.

Page 422 of the FEIS shows the framework for the economic analysis. Because the benefit/cost (b/c) ratio does not consider acres treated or work completed to have a benefit, Alternative 2 has the "best" b/c ratio. Treating fewer acres will obviously cost less due to decreased sale prep work, decreased road work, decreased sale administration, decreased physical logging and decreased management of activity fuels (among other things).

AFRC is also confused why the stumpage and value/MBF is higher for Alternative 2. The inherent value will not be different for the timber. The difference in value comes from the associated average DBH and included work items such as the size of the specified road package, brush deposits, road deposits, snagging requirements, and intangibles such as risk to purchasing the sale and the perceived future value of the timber.

By removing key components of the economic analysis, the Forest Service has an erroneous FEIS.

Resolution Requested

AFRC requests that the Responsible Officer modify the economic analysis that can then be used in determining the real b/c ratio in the Final Record of Decision.

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

The Purpose and Need for this Project are identified on page two of this letter.

AFRC is primarily focused on improving overall forest health through timber management which leads to improved resiliency to wildfire and other disturbances, restored health and vigor of at risk forest components, conditions for better protection of life and property within the Wildland Urban Interface, and restored watershed conditions. Thus, AFRC and our members believe that any reductions in treatment from the proposed 3,420 acres of commercial treatment will retard attainment of the Purpose and Need. We expressed this correlation between acres treated and attainment of project objectives clearly in our scoping and EIS comments: “In AFRC’s opinion, the goal of any FS 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, should be the metric that indicates how well the FS 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. [...] The consideration of active management on every acre of 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.”

As such, by including any part of Alternative 1 (No Action), the Project will be further away from attainment of the Purpose and Need of the Project.

Resolution Requested

AFRC requests that the Responsible Official not incorporate any elements of the Alternative 1 (No Action) into the selected alternative. As the current decision is a draft, 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 written in a cursive, flowing style.

Travis Joseph
AFRC President