



VIA online submission:

<https://cara.ecosystem-management.org/Public/CommentInput?project=53966>

July 27, 2020

Dave Warnack, Forest Supervisor  
Willamette National Forest  
3106 Pierce Parkway, Suite D  
Springfield OR, 97477

RE: Flat Country Environmental Impact Statement Objection

Pursuant to 36 C.F.R. Part 218.8, the American Forest Resource Council files this objection to the proposed draft decision for the Flat Country Environmental Impact Statement. McKenzie River District Ranger Darren Cross is the responsible official. The Flat Country Project occurs on the McKenzie River 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 Flat 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 Director  
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 EIS which are hereby incorporated by reference.

**Because the actions described in Alternative 3 of the Final EIS do not meet components of the purpose & need of the project, 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:

*“Provide a sustainable supply of timber products”*

*“Actively manage stands to improve stand conditions, diversity, density, and structure”*

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 Draft EIS comments, we expressed our thoughts on what a sustainable timber management paradigm consists of. This includes a combination of intermediate thinning treatments followed by regeneration harvest treatments. We specifically noted that *“Based on fundamental forestry principles and the ecology of Douglas-fir forests, it is impossible to manage timber resources sustainably in this region in the absence of regeneration harvest. The Forest Service cannot thin forever. Ultimately the Forest Service will run out of stands to thin, and by that point the forest age-class distribution will be far out of balance to the point where the reliability and sustainability of its timber supplies will be compromised.”* Our Draft EIS comments expanded on this issue as it relates to the action alternatives by stating that *“Alternative 3, which was developed in response to public stakeholders requesting that the project “refrain from regeneration harvest” and “refrain from harvesting older stands”, clearly does not meet the purpose of “providing a sustainable supply of timber products.”*

Incorporation of elements analyzed in alternative 3, specifically the deferral of 100% of the planned regeneration harvest, will retard the Forest Service’s ability to meet the Purpose and Need of providing a sustainable supply of timber products. Adoption of alternative 3’s “thinning-only” approach will only exacerbate the Forest’s shortcomings over the past 25 years of implementing a truly sustainable timber management program.

In addition to the deferral of regeneration harvest, alternative 3 also treats significantly fewer acres with commercial thinning treatments. 990 acres of stands in need of thinning will be deferred in alternative 3. Reduction of thinning acres as proposed in alternative 3 would

diminish the attainment of the Purpose and Need of improving stand level diversity, density and structure. These deferrals would also negatively impact the sustainable timber objectives as thinning treatments that reduce stand density will improve the growth rates of residual trees and improve the potential for future timber harvests.

### **Resolution Requested**

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 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