



VIA email: objections-pnw-rogueriver-siskiyou@fs.fed.us

August 28, 2020

Merv George Jr, Forest Supervisor
Rogue River-Siskiyou National Forest
3040 Biddle Rd.
Medford OR, 97504

RE: Shasta Agness Landscape 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 Shasta Agness Landscape Restoration Project Final Environmental Impact Statement (FEIS). Gold Beach District Ranger, Wade McMaster, is the contact person. Rogue River-Siskiyou National Forest Supervisor, Merv George, is the responsible official. The Shasta Agness Landscape Restoration Project (Shasta Agness) occurs on the Gold Beach Ranger District on the Rogue River-Siskiyou National Forest (RR-SNF).

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. Shasta Agness 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) Although the RR-SNF requested increased diameter limits for this Project from the LSR Workgroup, the diameter limit is still too low and will likely retard the attainment of the Purpose and Need.**

The Purpose and Need of restoring resilience and ecological integrity to unique ecosystems cannot be realized without the development of site-specific silvicultural prescriptions. Upon field review, AFRC found that the oak woodlands within the Project contain encroaching Douglas Fir trees greater in diameter than the requested and approved diameter for the Project, thus many oaks will not be released, and the Purpose and Need will not be fully met on the landscape.

AFRC previously commented on this issue in our Draft EIS comment letter:

"The diameter limit of 28 inches for radial release of oaks or pines (Alt. 1 & 2) will not allow the oak [...] to be released. In addition, the diameter limit of 26 inches for general density thinning area (Alt. 1 & 2) drives the prescription in many of the oak stands, leaving more density on the landscape than described in the desired condition on pages 54-55."

Moreover, AFRC believes restrictive diameter limits do not allow for site specificity during implementation leading to a lack of desired condition attainment across the whole Project Area.

Resolution Requested

AFRC requests that oak woodlands units be treated first to ensure additional encroaching Douglas Fir trees do not "grow out of prescription" and effectiveness monitoring is completed to better position and prepare the Forest Service for future projects in need of adjusted or removed diameter limits.

- 2) Because the inaction described in Alternative 4 (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 of this Project is identified on page v of the FEIS:

“The overall purpose of the Project is to: restore resilience and ecological integrity to unique ecosystems and to aquatic and riparian habitats; conserve and accelerate the development of late-successional forests while preserving species diversity; and provide a diverse range of high-quality, sustainable recreation opportunities supported by a more environmentally sustainable road system.”

AFRC is primarily focused on improving overall forest health through timber management which leads to improved resiliency to disturbances, restored health and vigor of at risk forest components such as unique ecosystems, conditions for better protection of life and property, and restored watershed conditions. Thus, AFRC and our members believe that any reductions from the proposed 6,967 acres of treatment will retard attainment of the Purpose and Need. We expressed this correlation clearly in our EIS comments:

“AFRC believes Alternative 1 will most fully obtain the purpose and need of the Shasta Agness Project. Because of this, no portions of the No Action Alternative, Alternative 2 or Alternative 3 should be incorporated into the final decision.”

Our scoping comments and EIS comments also portrayed the importance to our members of acres treated by means of volume produced:

“Our members depend on a predictable and economical supply of timber products off Forest Service land to run their businesses and to provide useful wood products to the American public. This supply is important for present day needs but also important for needs in the future. This future need for timber products hinges on the types of treatments implemented by the Forest Service today. Of particular importance is how those treatments effect the long-term sustainability of the timber resources on Forest Service managed land. AFRC has voiced our concerns many times regarding the long-term sustainability of the timber supply on Forest Service land and how the current management paradigm is affecting this supply. While the treatments on the Shasta Agness project are unlikely to directly address this long-term sustainability concern, they will likely provide short-term products for the local industry and we want to ensure that this provision is an important consideration for the decision maker as the project progresses.”

Although volume production is not a Purpose and Need of this Project, it is a by-product and the life blood of the timber industry which is relied upon to achieve all other Purpose and Needs of this Project. Without economically viable timber sales that support a robust local timber industry, other components of the Purpose and Need would be unachievable. As such, by including any part of Alternative 4 (No Action), the Project will be further away from attainment of the Purpose and Need of the Project, as well as the short term and long term sustainability of the Forest Service’s timber resource.

Resolution Requested

AFRC requests that the Responsible Official not incorporate any elements of Alternative 4 (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 then compromise the forest restoration and conservation 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" being more prominent than the last name "Joseph".

Travis Joseph
AFRC President