



VIA online submission: <https://cara.ecosystem-management.org/Public/CommentInput?Project=53176>

July 12, 2021

Kevin Larkin, Acting Forest Supervisor  
Siuslaw National Forest  
3200 SW Jefferson Way  
Corvallis, OR 97331

RE: Sand Lake Environmental Assessment Statement Objection

Pursuant to 36 C.F.R. § 218.8, the American Forest Resource Council files this objection to the proposed draft decision for the Sand Lake Environmental Assessment. Hebo District Ranger William Conroy is the responsible official. The Sand Lake Project is located on the Hebo Ranger District on the Siuslaw 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 Sand Lake 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  
541-525-6113  
[ageissler@amforest.org](mailto: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.

**Because the inaction described in Alternative 1 (No Action) of the Final EA does not meet numerous 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:

*“Sell timber to help fund actions designed to enhance ecosystem function”*

*“Accelerate the development of late-successional habitat in young stands”*

We believe that 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 EA comments, we expressed concern regarding some units proposed during scoping that were deferred in the Final EA. In those comments we stated that: *several units have already been dropped between project scoping and EA publication. These deferrals amount to 300 acres of treatment where the project objective of accelerating late seral habitat will **not** be achieved. We urge you to not diminish the project's scope any further.*

We are aware of the variety of factors that typically cause the Forest Service to defer treatment in proposed areas. These deferrals, while common, should compel the Forest Service to strive to treat those stands that were *not* deferred. We urge you to maintain the 2,330 acres of commercial thinning proposed in the Draft Decision in the ensuing Final Decision. Incorporation of any

element of the no-Action alternative would result in fewer acres treated to accelerate the development of late-successional forest habitat and less timber volume sold to help fund additional enhancement projects.

### **Resolution Requested**

AFRC requests that the Deciding Official not incorporate any elements of Alternative 1 into the selected alternative. As the current decision is a draft decision, potential exists for the reduction of the level of acres treated that would compromise the Purpose and Need.

### **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 stylized with a large, sweeping initial "T" and a cursive "J".

Travis Joseph  
President