



VIA email submission:

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January 26, 2022

Glenn Casamassa, Regional Forester  
R6 Regional Office  
1220 SW Third Avenue  
Portland, OR 97204.

RE: Stella Environmental Impact Statement (EIS) Objection

Pursuant to 36 C.F.R. Part 218.8, the American Forest Resource Council files this objection to the proposed draft record of decision (ROD) for the Stella EIS. Rogue River-Siskiyou National Forest Supervisor, Merv George is the responsible official. The Stella Project occurs on the High Cascades Ranger District on the Rogue River-Siskiyou 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 Stella 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 both the scoping notice and Draft EIS which are hereby incorporated by reference.

### **1. Incorporation of vegetation management components of alternative 3 into the Final Decision would inhibit the attainment of several aspects of the purpose and need.**

The purpose & need as it appears in the Final EIS includes, among other things, the following:

*“Provide a sustainable flow of goods and services that contribute to Forest targets and provide social and cultural opportunities.”*

*“Improve forest resilience by reducing the risk of loss from uncharacteristic wildland fire and/or insect and disease outbreak by restoring forest structure, composition, and density.”*

We believe the goal of any Forest Service vegetation management project should be to meet the purpose and need to the maximum extent across as many acres of the project area as possible. The scope, primarily measured in acres treated and timber volume offered, should be the metric that indicates how well the Forest Service is meeting the purpose and need 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 addressed each of the needs listed above. We described that “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, and we thank the District for developing a project that, if implemented properly, will provide these products in an economically viable manner.” Over the past five years, the Rogue River-Siskiyou has averaged 32.6 MMBF of timber sold annually, while their Probable Sale Quantity (PSQ) calculated in their current Land and Resource Management Plan as amended by the Northwest Forest Plan is set at 50 MMBF annually. These ongoing shortfalls have contributed to the diminishing timber products infrastructure in southwest Oregon. In 2016 Rough and Ready

permanently closed its sawmill in Cave Junction. In 2019, Swanson Group permanently closed its sawmill in Glendale. In an [interview with the News Review](#), owner Steve Swanson described the decision to shut the mill down by stating that “The issue is simply timber supply. The region is starving for timber, and it’s just not being sold by the biggest landowner which is the federal government.”

One of the primary obstacles contributing to the Rogue River-Siskiyou’s inability to attain its PSQ and actively treat more of its landscape is timely and efficient completion of NEPA analyses. The Stella EIS consumed 515 pages. In 2020, the Shasta Agness EIS on the Gold Beach District consumed 901 pages. These encyclopedic analyses will not grow the Forest’s timber program or its active management program. However, until the Forest can improve its NEPA efficiency practices, the least it can do is fully implement the treatments that *are* analyzed to meet the project’s purpose and need.

Our Draft EIS comments also addressed our desire to see the Forest maximize overall treatment acres to meet the need for forest resilience improvement. We stated that “Based on the EIS, it appears that the District is proposing commercial treatment on approximately 25% of the project area, totaling 16,250 acres. Given the scale at which this project is proposed to be implemented on, we urge the District to fully implement treatment on those acres that are analyzed and to not defer treatment. AFRC encourages the District to implement Alternative 2 in a way that meets the described project purpose and need to a high degree.”

The acreage treatment reductions in alternative 3 are a function of deferrals in riparian reserves and northern spotted owl suitable habitat. Our scoping comments outlined the need to treat in riparian reserves to achieve the purpose and need. Those comments included a scientific review that we believe “suggests that there exists a declining rate of returns for “protective” measures such as no-cut buffers beyond 30-40 feet. Resource values such as thermal regulation and coarse wood recruitment begin to diminish in scale as no-cut buffers become much larger. We believe that the benefits in forest health achieved through density management will greatly outweigh the potential minor tradeoffs in stream temperature and wood recruitment, based on this scientific literature.”

We expanded on this request in our EIS comments by noting that the treatment deferrals that were considered to create Alternative 3 would, if implemented, diminish the attainment of the purpose and need. Fewer acres of treatment in RR would:

1. Diminish the scale at which forest resiliency is improved
2. Diminish the scale at which risk of loss from uncharacteristic wildfire is reduced
3. Diminish the scale at which forest structure and density is improved
4. Diminish the scale at which aquatic ecosystems are restored

We also noted in our comments that “AFRC understands the Forest Service’s obligation to manage for the recovery of threatened and endangered species, including the northern spotted owl (NSO). However, we also understand that some of the forest habitat needs traditionally associated with the NSO, namely canopy cover, often conflict with the restoration and resilience objectives on forests in southwest Oregon.” We believe that this reality supports the notion that short-term downgrading of NSO suitable habitat could have long-term benefits to forest health and better meet the purpose and need of the Stella project as it applies to forest resilience.

We summarized our thoughts in our DEIS comments by asserting that fewer acres of variable density treatment in stands containing habitat elements for the northern spotted owl would:

1. Diminish the scale at which forest resiliency is improved
2. Diminish the scale at which risk of loss from uncharacteristic wildfire is reduced
3. Diminish the scale at which forest structure and density is improved

The need to “improve forest resilience” is attained through multiple silvicultural treatments, including variable density thinning (VDT) and commercial thinning (CT). The main difference between the proposed alternative and alternative 3 is acres of VDT and CT as well as ladder fuel reduction. 2,385 fewer acres of VDT, 330 fewer acres of CT, and 675 fewer acres of ladder fuel reduction are proposed in alternative 3. These reductions are primary contributors to the overall reduction of 3,495 acres of “restoration treatments” outlined in Table II-14 in the FEIS.

That Table lists “restoration treatment” acres as an “indicator” to the attainment of the purpose and need of restoring forest resilience. Clearly, alternative 3 meets this need to a lesser degree than alternative 2.

The proposed alternative will, according the FEIS, contribute 87 MMBF of timber while alternative 3 will provide 70.1 MMBF of timber. Table II-14 notes that “total volume harvested” is an “indicator” for the need to “provide a sustainable supply of goods.” Once again, the results of the implementation of alternative 3 will retard the ability of the Forest to fully achieve the project’s purpose and need.

### **Resolution Requested**

AFRC requests that the Deciding Official not incorporate elements of alternative 3 into the selected alternative that would reduce the amount of acres treated or timber volume generated. 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 flow of goods and forest resilience needs stated.

**2. Incorporation of road decommissioning components of alternative 2 into the Final Decision would inhibit the attainment of the purpose and need associated with transportation.**

The purpose and need as it appears in the FEIS includes the following:

*“Restore and provide an adequate transportation system to meet administrative and recreational demands while minimizing environmental impacts and considering long-term funding.”*

Our DEIS comments emphasized our concerns “about an in-tact road system that facilitates the active management on appropriate lands, specifically those lands designated as Matrix where sustainable timber management is mandated. Sustainable timber management is unlikely to occur in an economical manner without a quality road system in place.” Alternative 2 proposed a significant amount of road decommissioning (38 miles), many of which are on lands designated as Matrix. We believe that the “adequacy” of the transportation system in Matrix lands would be diminished with additional miles of road decommissioning.

Furthermore, we believe that a significant factor contributing to increased fire activity in the region is the decreasing road access to our federal lands. This factor is often overshadowed by both climate change and fuels accumulation when the topic of wildfire is discussed in public forums. However, we believe that a deteriorating road infrastructure has also significantly contributed to recent spikes in wildfires. This deterioration has been a result of both reduced funding for road maintenance and the federal agency’s subsequent direction to reduce their overall road networks to align with this reduced funding. The outcome is a forested landscape that is increasingly inaccessible to fire suppression agencies due to road decommissioning and/or road abandonment. This inaccessibility complicates and delays the ability of firefighters to quickly and directly attack nascent fires. On the other hand, an intact and well-maintained road system would facilitate a scenario where firefighters can rapidly access fires and initiate direct attack in a more safe and effective manner. We believe that the “adequacy” of the transportation system in lands at risk of fire starts would be diminished with additional miles of road decommissioning.

We were pleased to see the adoption of the road decommissioning proposed in alternative 3 rather than what was proposed in alternative 2. We were also pleased to see the rationale for this decision in the ROD, which noted access for effective fire control.

**Resolution Requested**

AFRC requests that the Deciding Official not incorporate elements of alternative 2 associated with road decommissioning into the selected alternative. As the current decision is a draft decision, potential exists for amendments to increase the level of road decommissioning in a manner that would reduce adequate access.

### **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