



June 23, 2022

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

RE: Quartzville-Middle Santiam Environmental Assessment Objection

Pursuant to 36 C.F.R. § 218.8, the American Forest Resource Council files this objection to the proposed draft decision for the Quartzville-Middle Santiam Environmental Assessment. Sweet Home District Ranger Nikki Swanson is the responsible official. The Quartzville-Middle Santiam Project is located on the Sweet Home 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 Quartzville-Middle Santiam 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

American Forest Resource Council
700 N.E. Multnomah, Suite 320 • Portland, Oregon 97232
Tel. 503.222.9505 • Fax 503.222.3255

Andy Geissler, Federal Timber Program Director
2300 Oakmont Way; Suite 205
Eugene, OR 97401
541-342-1892
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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 and Draft EA solicitation which are hereby incorporated by reference.

The decision to defer all treatments in stands over the age of 80 and all shelterwood treatments through the selection of Alternative 4 will diminish the scale of 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:

- Contribute to a predictable, sustainable supply of forest products to help maintain the stability of local and regional economies and markets
- Create diversity in structure and age class across the project area

We believe that the goal of any Forest Service vegetation management project should be to meet the stated project objectives to the *maximum degree* 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.

The EA states clearly on page 23 that **“The Forest Service proposes to implement Alternative 2, which was developed to fully meet the purpose and need for this project.”**

In our Draft EA comments, we urged the Forest Service to select the alternative that meets the Purpose & Need elements to the highest degree. Specifically, we asserted that *“based on the substance of the EA, Alternative 2 meets each element of the Purpose & Need to a higher degree than Alternatives 3 or 4.”* In particular, we noted that deferral of shelterwood treatments would retard the ability of the Forest Service to “create diversity in structure and age class” as all remaining treatments would be limited to thinning. The EA states that “Less than 0.01% of the land managed by the Forest Service within the QMS project area is 0 to 15 years of age.” By

deferring all shelterwood harvests, that age class will remain at less than 0.01%. Thinning treatments do not create diversity in age class. When a 60-year-old stand is thinned, that stand remains 60 years old following treatment. The actions in Alternative 4 would not create any diversity in age class, and therefore would not meet the respective Purpose & Need element that addresses age class diversity.

Alternative 4 would also create less structural diversity than Alternative 2 though the elimination of shelterwood harvests. As highlighted above, the project area is devoid of early seral structural stages with less than 0.01% of the Forest Service managed land in that stage. Selection of Alternative 4 would fail to attain this element of the Purpose & Need to high degree.

Alternative 4 is also grounded in a flawed concept endorsed by special interest groups opposed to active forest management that forests over the age of 80 are universally similar in structure and lack the need for management. AFRC has and will continue to urge the Forest Service to develop silvicultural treatments based on actual forest conditions, not on arbitrary age limitations. Unfortunately, adoption of Alternative 4 is a signal that the Forest Service is not basing its management decisions on actual stand conditions but rather on an arbitrary age. This signal is extremely disappointing and will ultimately result in the Purpose & Need not being met to its full potential.

Ultimately, the decision to implement Alternative 4 represents a drastic pivot from the EA's assertion that Alternative 2 was intended to be implemented in order to fully meet the Purpose & Need. The Draft Decision does not provide rationale for this pivot in the context of attaining the Purpose & Need. Instead, the Draft Decision states that "Alternative 4 presents the least complicated path forward" and that "The older, fire-regenerated timber stands proposed under Alternatives 2 and 3 generated a fair amount of public attention and it became obvious those stands warrant a closer look before moving forward with harvest treatments."

Resolution Requested

AFRC requests that the Deciding Official adopt Alternative 2 in order to fully meet the Purpose & Need.

If this adoption is infeasible at this time, we would like the Forest Service to elaborate on its current decision rationale by explaining the following:

1. What are the factors that make adoption of Alternative 2 a "complicated path forward?"
2. What was the substance of the "public attention" that compelled the Forest Service to identify a need to take a "closer look" at older, fire-regenerated stands?

3. What are the resource issues that were not assessed appropriately in the EA that would warrant a “closer look?”

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