



June 23, 2022

Holly Jewkes, Reviewing Officer
Deschutes National Forest
63095 Deschutes Market Road
Bend, OR 97701
Attn: Sasha Fertig

RE: Green Ridge 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 Green Ridge Environmental Assessment. Sisters District Ranger Ian Reid is the responsible official. The Green Ridge Project is located on the Sisters Ranger District on the Deschutes 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 Green Ridge 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

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 implement Alternative 3-modified 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:

- The purpose of this project is to promote ecological restoration by reestablishing the composition, structure, pattern, and ecosystem processes necessary to facilitate terrestrial and aquatic ecosystem sustainability, resilience, and health

This Purpose & Need statement also included the provision of forest products to support local and regional economies.

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.

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 “we believe the effects analysis disclosed in the EA clearly indicate that alternative 2 meets the Purpose and Need to a higher degree than alternative 3 or 4. Not only does alternative 2 generate more timber volume than the others, it also treats more acres to meet the ecological restoration objectives.”

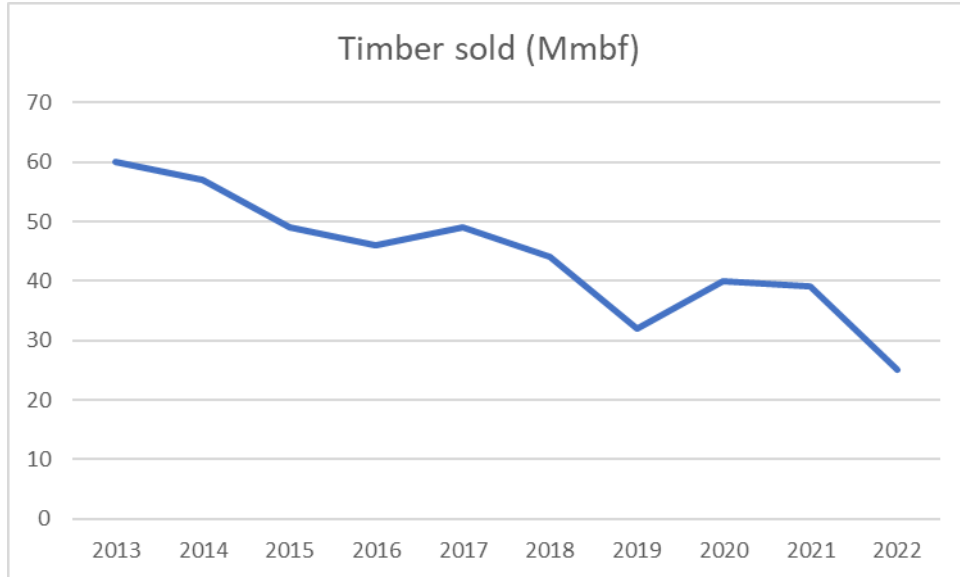
We also articulated our thoughts on the appropriateness of some of the project design features that shaped the substance of alternatives 3 and 4. We asserted that “the rationale for the reductions in acres treated and timber volume generated in alternatives 3 and 4 do not seem to be aligned with the land allocations being treated. In particular, the “maintenance of NSO dispersal habitat” seems to be a driver in the design of alternatives 3 and 4. However, maintenance of NSO habitat of any kind is not an objective on lands designated as Matrix. Page 84 of the EA outlines what the primary objectives for Matrix are. Those include: *(1) production of commercial yields of wood, including those species such as Pacific yew and western red cedar that require extended rotations, (2) retention of moderate levels of ecologically valuable old-growth components such as snags, logs, and relatively large green trees, and (3) increasing ecological diversity by providing early-successional habitat.*” (B-5 and B-6). While the Matrix direction does provide for wildlife habitat dispersal needs and other ecological resources, there is not firm direction on managing specifically for habitat types of threatened and endangered species—those needs are met in the late successional reserve areas. Maintaining a habitat type for a late successional species outside of late successional reserves at the cost of meeting other objectives more aligned with the Matrix allocation should not be prioritized on the project.”

Despite these requests, the District has selected an alternative that strives to maintain “long term maintenance of NSO dispersal habitat” on Matrix lands through the retention of higher stand densities and the outright deferral of other treatment units. This decision comes with significant tradeoffs that, given the current threats to our national forests, are surprising to us. Some of those tradeoffs outlined explicitly in the EA are listed below:

1. The selection of alternative 3 will result in more acres in a “high fire hazard” condition than would result from selection of alternative 2 (EA, pp. 134, Table 54).
2. The positive impacts to stand density, stand composition, tree size, risk of insects and disease, and risk of high-severity wildfire are the greater under alternative 2 than alternative 3 (EA, pp.96).
3. The selection of alternative 2 would have negligible effects to the NSO. “None of the alternatives’ effects are impactful enough to change Forest-wide habitat or population trends for NSOs. None of the alternatives would cause an irreversible or irretrievable commitment of resources per section 7(d) of the ESA” (EA, pp. 163).
4. All action alternatives would not adversely affect the NSO and its critical habitat.

We find it puzzling that the Forest Service selected an alternative that results in a higher fire hazard condition, less desirable forest stand density and composition, higher risk of insect and disease damage, and higher risk of high-severity wildfire in order to attain negligible benefits for the NSO.

Our EA comments also highlighted the bleak outlook for the timber products industry in the ensuing decades due to a multitude of factors including the 2020 wildfires, Oregon Forest Accords, and recent decisions on how state trust lands are managed by the Washington Department of Natural Resources. The timber program on the Deschutes National Forest has been in steep decline since 2013 when the Forest sold and awarded 60 Mmbf of timber. This year, the Deschutes is planning to offer 25 Mmbf of timber. That represents nearly a 60% reduction.



The Green Ridge Decision is simply the next in a long trend of decisions that are causing the decay of the Deschutes' timber program. These decisions and trends, if they continue, will surely result in the loss of local infrastructure that not only supports local communities but also assists the Deschutes in achieving its larger land management goals.

Ultimately, the decision to implement alternative 3-modified will result in a degraded attainment of the purpose and need and contribute to troubling trends in the Deschutes National Forest's timber program. Nearly ALL objectives will be met to a lower degree than would with the selection of alternative 2.

Resolution Requested

AFRC requests that the Deciding Official adopt Alternative 2 in order to fully meet the Purpose & 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 written in a cursive, slightly slanted style.

Travis Joseph
President