



VIA online submission:

<https://www.fs.usda.gov/project/?project=55868>

May 22, 2023

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

RE: Youngs Rock Rigdon Environmental Impact Statement Objection

Pursuant to 36 C.F.R. Part 218.8, the American Forest Resource Council (AFRC) files this objection to the proposed draft decision for the Youngs Rock Rigdon Environmental Impact Statement (EIS). Willamette National Forest Supervisor David Warnack is the responsible official. The Youngs Rock Rigdon Project occurs on the Middle Fork 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 Youngs Rock Rigdon 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

Corey Bingaman, Western Oregon Field Coordinator
2300 Oakmont Way, Suite 205
Eugene, OR 97401
541-521-9143
cbingaman@amforest.org

Reason for Objection

The content of this objection below is based on AFRC's prior specific written comments submitted in response to both the scoping notice and the Draft EIS, which are hereby incorporated by reference.

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 and Need as it appears in the Final EIS includes, among other things, the following:

(1) Provide a sustainable supply of Forest Products.

In our Draft EIS comments, we expressed our thoughts on what a sustainable timber management paradigm consists of. This includes a combination of intermediate thinning treatments followed by regeneration harvest treatments. We specifically noted that ***“Based on fundamental forestry principles and the ecology of Douglas-fir forests, it is impossible to manage timber resources sustainably in this region in the absence of regeneration harvest. The Forest Service cannot thin forever. Ultimately the Forest Service will run out of stands to thin, and by that point the forest age-class distribution will be far out of balance to the point where the reliability and sustainability of its timber supplies will be compromised.”***

Incorporation of elements analyzed in Alternative 3, specifically the deferral of 258 acres of the planned regeneration harvest and 494 acres of commercial thinning, will retard the Forest Service's ability to meet the Purpose and Need of the Project to provide a sustainable supply of timber products. Additionally, thinning treatments that reduce stand density will improve the growth rates of residual trees and improve the potential for future timber harvests.

(2) Improve Stand and Landscape Diversity, Structure, and Resiliency

(3) Strategically Reduce Hazardous Fuels

Natural stand thinning will be a critical restoration tool in the Youngs Rock Rigdon Project. These treatments are designed to impart greater structure and diversity into stands that have become imbalanced from their natural succession due to fire exclusion, which has resulted in forests that are overcrowded and less resilient to stand-replacing events—such as wildfires and pest outbreaks.

This problematic exclusion played out in 2020 when, due in large part to this imbalance, many forests across the West experienced catastrophic wildfires. It is more evident now than ever before that the Forest Service must reduce fuels across their landscape to prepare for future stand-replacing events. There must be protections in place that prevent the loss of legacy trees

across the Forest. Thinning in natural stands will be critical for removing ladder fuels that carry flames up into the canopies of these legacy trees. By reducing natural stand thinning acres in Alternative 3, the Forest Service is diminishing the attainment of the Purpose and Need of improving stand level diversity, structure, and resiliency, as well as the reduction of hazardous wildfire fuels.

Finally, AFRC believes 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 and need on 600 acres.

Resolution Requested

AFRC requests that the Deciding Official not incorporate any elements of Alternative 3 into the selected alternative. 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—which would compromise forest health and the diversity of objectives stated.

Request for Resolution Meeting

Pursuant to 36 C.F.R. § 218.11, the Objector requests to meet with the reviewing officer to discuss the issues raised in this objection and potential resolutions. In the event multiple objections are filed to 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, Corey Bingaman, at the address and phone number provided above, to arrange a date for the resolution meeting.

Sincerely,

A handwritten signature in black ink, appearing to read "Travis Joseph".

Travis Joseph
President