



VIA online submission:

<https://cara.fs2c.usda.gov/Public/CommentInput?Project=62126>

February 14, 2026

Lana Cruz, District Ranger
High Cascades Ranger District
Rogue River-Siskiyou National Forest
47201 Highway 62
Prospect, OR 97536-9724

RE: Snowy Butte Landscape Restoration Project Objection

Pursuant to 36 C.F.R. Part 218.8, the American Forest Resource Council files this objection to the proposed draft decision for the Snowy Butte Landscape Restoration Project Environmental Assessment. High Cascades District Ranger Lana Cruz is the responsible official. The Snowy Butte Landscape Restoration 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, Nevada, 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 Snowy Butte Landscape Restoration 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, Oregon State Manager
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 EA, which are hereby incorporated by reference.

I. Failure to disclose location of acres deferred from commercial thinning in Draft Environmental Assessment.

Your Final Environmental Assessment for the Snowy Butte Project identifies changes which occurred between the Draft EA and Final EA. Among those changes, 573 acres of commercial thinning in "old-growth stands with high complexity" were converted to non-commercial thinning units. While we do not question your specialists' determination of stand structure in these converted units, it would be helpful to understand where this deferral took place in order to better assess the impacts of this decision on the project overall.

Unfortunately, we are given very little in terms of the impacts resulting from converting these units. Do any of them occur within the Matrix Land Use Allocation? Would commercial harvest better suit the stated purpose and need of this project and improve these stands' resilience to stand-replacing fire or insect and disease outbreaks? Following non-commercial treatment, would these stands continue to exceed their Historic Range of Variability (HRV) in terms of density? If so, by how much?

We cannot properly assess the impacts of this decision to defer treatment in older stands, and we believe this warrants further explanation.

Resolution Requested

AFRC requests that the Deciding Official disclose the locations of those stands deferred from treatment between the Draft EA and Final EA.

Please provide a map and a table describing the pertinent information outlined above:

- Land use allocation of deferred stands
- Current and future HRV of deferred stands for both commercial and non-commercial treatments
- Current and future wildfire hazard rating of the deferred stands for both commercial and non-commercial treatments

II. Deferral of Treatment in NSO Activity Centers would inhibit the attainment of the stated Purpose and Need.

The Purpose and Need as it appears in the Final EA includes, among other things, the following:

(1) Actively manage forests to increase forest resiliency, promote stand health, and restore existing meadows to promote growth, diversity, and structural complexity.

Between the Draft EA and Final EA, the Forest Service elected to defer treatment in two occupied NSO core use areas. Specifically, “*four silviculture units (454 acres), a portion of the roadside shaded fuel breaks (77 acres) and portion of burn blocks (115 acres)*” were removed from proposed treatment. Again, we are not given specifics of where this removal has occurred, so it is difficult to properly assess the impact of this decision.

Based on the analysis in the Draft EA, however, we know that none of the originally proposed treatments in known NSO activity centers were going to reduce suitable habitat in the Core-Use Areas or Home Ranges below the USFWS baselines of 50% (252 acres) and 40% (1,158 acres), respectively. Furthermore, your draft EA noted that “*Recovery Action 32 habitat, or High Quality Nesting, Roosting, Foraging (NRF) habitat...do not occur in the proposed treatment units.*”

Since the Snowy Butte Project does not target RA-32 habitat, and no proposed treatments will reduce the amount of suitable habitat below baseline conditions within NSO activity centers, then there should be little, if any, concern for implementing the proposed treatments from the Draft EA within occupied Core Use Areas. This decision diminishes the Forest’s ability to attain the stated Purpose and Need to *Actively manage forests to increase forest resiliency, promote stand health, and restore existing meadows to promote growth, diversity, and structural complexity.*

In fact, there should be greater emphasis to implement treatments designed to increase forest resilience and promote stand health within known NSO activity centers. As the Forest is likely aware, the greatest threat to the survival of the NSO is large wildfires and the spread of the barred owl. From AFRC’s perspective, fire exclusion and the shift from federal land managers playing a role as *active* managers of their landscape to *passive* ones has been among the greatest reasons for the increase of ahistoric wildfires throughout the Western States. The thinning proposed in your Draft EA will be critical for protecting known nest patches. By deferring treatment now, the Forest Service is electing to use wildfire as the preferred vegetation management tool in these occupied Core Use Areas.

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 the Deciding Official to allow treatment in known NSO activity centers where proposed treatment will not reduce the proportion of *suitable* NSO Habitat below the baseline of 50% in Core-Use or 40% in Home Range areas.

III. Incorporation of vegetation management components of the Final Environmental Assessment into the Final Decision would inhibit the attainment of the stated Purpose and Need.

The Purpose and Need as it appears in the Final EA includes, among other things, the following:

(2) Contribute to commercial timber and local economy.

In our scoping 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: *“If the Forest Service truly wants to manage timber in a sustainable manner then it must find a way to incorporate regeneration harvest back into its management paradigm. The difficulty that the Forest Service has had implementing any treatment that successfully regenerates a stand of mature timber has resulted in an unbalanced age-class distribution across the Forest, particularly on the Matrix allocation, and has left a void in stands in the 0-20 year age class. This void concerns AFRC and raises the question of where future timber products off the Forest Service will come from. We are supportive of the thinning prescriptions that are being proposed on this project as a piece of a larger management model built to ensure a sustainable timber supply; however, by itself, a thinning only regime is ultimately unsustainable.”*

The Proposed Action does not address the inherent long-term unsustainability of a thinning-only forest management paradigm; therefore the Snowy Butte Project cannot produce a truly sustainable supply of timber.

Resolution Requested

AFRC urges the Forest Service to reconsider exclusion of regeneration harvest as a silvicultural tool for stands in the Snowy Butte project.

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