



VIA online submission:

<https://cara.fs2c.usda.gov/Public/CommentInput?Project=301815>

July 30, 2026

Duane Bishop, Forest Supervisor (Acting)
Willamette National Forest
3106 Pierce Parkway, Suite D
Springfield, OR 97477

RE: Dead Mountain Environmental Assessment 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 Dead Mountain Environmental Assessment (EA). Middle Fork District Ranger Gabe Wishart is the responsible official. The Dead Mountain 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, California, and Nevada. 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 Dead Mountain 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.

AFRC has been closely involved in the Dead Mountain Project since its inception in 2025 when we submitted substantive written comments during the scoping period. Throughout this period of public engagement we have attended informational meetings hosted by the Ranger District and

the South Willamette Forest Collaborative and made several field visits to various portions of the project area to review forest stand conditions, road infrastructure, and logging feasibility.

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 this project's scoping notice, which is hereby incorporated by reference.

In our scoping comments for this project, we urged the Forest Service to take a hard look at using temporary roads to facilitate yarding in areas identified for helicopter yarding. Unfortunately, the Forest did not perform such an analysis in its Draft EA, and nearly a third (28%) of the proposed commercial treatment resulting from this analysis will be performed via helicopter yarding. This is, obviously, very disappointing from AFRC's perspective for several reasons.

First, AFRC worries about the economic impact that this decision will have on sales resulting from the Dead Mountain analysis. As we noted in our scoping comments, helicopter yarding is, by far, the most expensive yarding system available to local purchasers. For this reason, we also noted in our comments that helicopter yarding should only be used as a last resort for any logging project.

Second, we are also concerned with the Forest's proposal to require helicopter logging across such a large portion of the Dead Mountain project's treatment area without disclosing those areas in your Draft EA. This makes it very difficult for AFRC to assess the Forest's decision. Presumably, these areas were logged in the past via conventional logging systems (i.e. ground and/or skyline yarding) since every unit proposed for commercial thinning in your Draft EA was previously managed.

For any Forest Service project with a commercial component, particularly those areas within the Matrix LUA, the Forest should strive to make those sales as financially viable as possible without compromising other resources that the Forest provides. Constructing forest roads is essential where active management is desired and proper road design and layout should pose little, if any, negative impacts to water or soil resources.

Another point of concern raised during the comment period was the issue of including tethered assist (TA) as a potential harvest system for timber sales resulting from this analysis. We noted in our written comments the growing importance of TA as a harvest system in Western Oregon. TA harvest systems are safer, more cost effective, and less impactful to forest resources when

compared to conventional cable harvest systems. Unfortunately, the Forest did not analyze the use of TA in the Dead Mountain Project.

Resolution Requested

We request that the Forest Service take a hard look at accessing the proposed helicopter units in the Dead Mountain project area via temporary roads in order to facilitate conventional yarding systems. This should include, at a minimum, a financial analysis comparing the costs associated with helicopter yarding when compared to conventional ground-based or skyline systems. Further, we request that the Forest Service disclose the exact areas in the Dead Mountain Project where helicopter yarding is proposed.

We also request that the Forest Service include analysis of the potential impacts of TA logging equipment into the EA. Omission of this analysis could significantly hamper the economic viability of future sales generated from this EA and limit the contractor pool able to operate on those sales.

Request for Resolution Meeting

36 C.F.R. § 219.57 outlines objection resolution meetings and states that “the reviewing officer must allow other interested persons to participate in such meetings.” We request notification be provided to AFRC of any such meetings to permit our participation.

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". The signature is written in a cursive, flowing style.

Travis Joseph
President