

Data Submitted (UTC 11): 7/14/2025 7:00:00 AM  
First name: Andy  
Last name: Geissler  
Organization: American Forest Resource Council  
Title: Federal Timber Program Director  
Comments: July 14, 2025

Rebecca Brooke

Siuslaw National Forest

Attn: Objections

3200 SW Jefferson Way

Corvallis, OR 97331

Dear Ms. Brooke,

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to provide supportive comments for the North Fork Smith Project which is currently in the Objection Period.

AFRC is a regional trade association whose purpose is to advocate for sustained timber yield 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. Many of our members have their operations in communities within and adjacent to the Siuslaw National Forest and management on these lands ultimately dictates not only the viability of their businesses, but also the economic health of the communities themselves.

AFRC has been closely involved in the North Fork Smith project since its inception in 2022 when we submitted substantive written comments during the "pre-scoping" period. We also closely reviewed the Draft EA and submitted written comments following its publication in 2024. Throughout this period of public engagement, we also made several field visits to various portions of the project area to review forest stand conditions, existing road infrastructure, and logging feasibility.

Our primary point of concern throughout the NEPA process was the large amount of treatment unit deferrals. Ultimately, 7,194 acres of potential treatments were deferred. Treatment deferrals are commonplace on Forest Service vegetation projects for a variety of reasons. However, the amount of deferrals on North Fork Smith was unusually high. We had productive conversations with District staff to understand the rationale behind these deferrals and, therefore, do not see the need to revisit those deferrals in detail. However, we would like the Reviewing Officer to consider those deferrals contextually as a Final Decision is contemplated.

We also commented extensively on the proposed road decommissioning, particularly for those road segments that a.) are located on or near stable ridgetops, and b.) provide access to deferred treatment units. We asked the Forest Service to consider whether road storage would be a more appropriate approach for these segments.

Once again, we also had productive conversations with District and Forest staff on this topic and, while we may not agree, we understand the thought process that went into the road plan for the North Fork Smith project.

Despite our concerns with treatment deferrals and road decommissioning, we support implementation of the project as outlined in the Draft Decision. However, since the current Decision is in draft form, there remains potential for further refinements to be made. The nature of the administrative objection process creates a scenario where those refinements could be made without full public participation. Therefore, we would like to request that AFRC have the opportunity to participate in any meetings or discussions between the Forest Service and potential objectors.

36 CFR 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.

We appreciate the work from the District staff to bring the North Fork Smith project near completion. We also appreciate the level of communication from the District and Forest staff over the past four years that helped us understand the project design. We hope to continue this level of communication through the objection period.

Sincerely,

Andy Geissler

Federal Timber Program Director

American Forest Resource Council