



VIA email: [objections-pnw-mthood@usda.gov](mailto:objections-pnw-mthood@usda.gov)

September 27, 2019

Richard Periman, Forest Supervisor  
Mt. Hood National Forest  
Zigzag Ranger Station  
70220 E. Highway 26  
Zigzag, OR 97049

RE: North Clack Integrated Resource Project Statement Objection

Pursuant to 36 C.F.R. Part 218.7, the American Forest Resource Council files this objection to the proposed draft decision for the North Clack Integrated Resource Project. Clackamas River District Ranger Jackie Groce is the responsible official. The North Clack project occurs on the Clackamas River Ranger District on the Mt. Hood 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 North Clack 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 Manager  
2300 Oakmont Way, Suite 205  
Eugene, OR 97401  
541-342-1892  
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 Draft EA which are hereby incorporated by reference.

**When compared to Alternative 2, the Proposed Alternative fails to adequately meet the Purpose and Need of the project and any incorporation of its elements would retard the agency's ability to meet those objectives to their fullest extent.**

Two elements of the Purpose and Need as they appear in the Final EA include the following:

*One desired condition for this area is to have forest stands across the landscape with a mix of ages and densities. A primary purpose of this project is to change that uniformity by introducing regeneration harvests that result in variable-looking early-seral stands.*

*The desired condition for the matrix component of the landscape is to have live productive forest stands that can provide wood products now and in the future.*

In AFRC's opinion, the goal of any Forest Service vegetation management project should be to meet the stated project objectives to the **maximum extent** 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 and Need on 500 acres is inferior to meeting the stated Purpose and Need on 600 acres.

In our scoping comments, we urged the District to maximize the treatment footprint in the project area in order to maximize the attainment of the desired outcomes, including the creation of early seral stands to diversify the age-class distribution and to create productive stands that can provide wood products in the future. In our EA comments, we expressed concern regarding how the thinning-only management paradigm adopted by the Forest Service has impacted its ability to provide wood products in the long term. Specifically, we wrote 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.**

This paradigm adopted by the Forest Service since the inception of the Northwest Forest Plan has provided a short-term supply of timber products, but unfortunately cannot fulfill the sustained long-term supply that we believe the Forest Service is mandated to provide. Thankfully, the Clackamas River Ranger District addressed this issue through the Purpose and Need statement for the North Clack project and developed an alternative (alternative 2) to respond to it by increasing the level of regeneration harvest that will maximize diversity in the watershed and future timber products. Although this increased level (341 acres) represents less than 2% of the project area, it is, at least, more than is proposed in the other action alternative (255 acres).

Ultimately, we believe that full implementation of the acres in the Draft Decision Notice is the only way to best meet the Purpose and Need and to maximize its attainment, particularly the portion of the Purpose and Need that addresses the need for age-class diversity and long-term wood products, and that any incorporation of elements of the other alternative would retard this attainment.

### **Resolution Requested**

AFRC requests that the Deciding Official not incorporate any elements of the other action alternatives 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 that would compromise the forest health and diversity objectives stated.

### **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, flowing style.

Travis Joseph  
President