



VIA online submission:

<https://cara.ecosystem-management.org/Public//CommentInput?Project=52305>

November 7, 2019

Forest Supervisor, Reviewing Officer  
Rogue River-Siskiyou National Forest  
3040 Biddle Road  
Medford OR, 97504

RE: Upper Applegate Watershed Restoration Environmental Assessment Objection

Pursuant to 36 C.F.R. Part 218.7, the American Forest Resource Council (AFRC) files this objection to the proposed draft decision for the Upper Applegate Watershed Restoration Environmental Assessment (EA). Siskiyou Mountains District Ranger, Donna Mickley is the responsible official. The Upper Applegate Watershed Restoration Project occurs on the Siskiyou Mountains District Ranger 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, 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 Upper Applegate Watershed 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**

Amanda Astor, Southwest Oregon Field Forester  
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**American Forest Resource Council**  
700 NE Multnomah, Suite 320 • Portland, Oregon 97232  
Tel. 503.222.9505

## 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 EA which are hereby incorporated by reference.

**The Purpose & Need of the project should be met to the greatest extent possible and the attainment of certain resource objectives that are identified in the Purpose & Need would be degraded if treatment is not *fully* implemented.**

According to the EA on page 4, “*The **Purpose** of the action is to protect and enhance the important community and agency identified values through the attainment of the following goals:*” AFRC has identified the goals that pertain to our objection, although we realize these are not all of the goals documented in the EA.

- “*Manage forest structure and species composition to increase biodiversity.*”
- “*Restore fire-adaptive species in the ecosystems, thereby encouraging more fire-resilient forests allowing the re-establishment of the ecological role of fire.*”
- “*Maintain/enhance late-successional habitat.*”
- “*Restore landscapes to more resilient conditions by providing a mosaic of seral stages.*”
- “*Reduce risk to communities and other developed areas from wildland fire.*”
- “*Promote small innovative forest products and restoration by-products.*”

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 & Need on 500 acres is inferior to meeting the stated Purpose & Need on 600 acres. Concurrently, if there is a way to “promote restoration by-products,” then it should be analyzed. AFRC pointed out several ways in our scoping comments, EA comments, and Iterative NEPA process (iNEPA) meeting discussions, to increase the ability of the project to achieve this community value and Purpose & Need of the project economically.

It is generally accepted by most in the scientific community, as well as among practicing foresters, that variable density thinning treatments are effective in accelerating the trajectory of dense and uniform mid-seral stands toward a late-seral stage. It is also generally accepted that such treatments are effective in improving forest health and vigor. Treating the project area to the maximum allowed under the EA would better achieve the bulleted objectives of the Purpose & Need above from the EA. Additionally, page 1 of the EA states, “*Collaboratively developed projects that recognize the connection between ecological conditions and a sustainable flow of goods and services form the foundation of this proposed action.*” The language of “a sustainable flow of goods and services” also shows up on page 4 under Community and Culture Values. This value is tied to the last bullet point above.

AFRC suggested eliminating the overarching prescription to maintain canopy cover at 40% to allow for site specificity to be utilized when developing prescriptions and allow for more economically feasible treatments to be conducted through the removal of more density and

restoration by-product. The Draft Decision Notice and Finding of No Significant Impact responds to this comment on page B-18 by stating, *“The NWFP Standards and Guidelines state that at a minimum, each 5th field watershed should have at least 50 percent of the watershed in a condition of a DBH of at least 11 inches and 40 percent canopy cover in order to provide for spotted owl dispersal across the landscape. This analysis area exceeds that threshold. In the UAWRP EA there is a typo, there are 24 owl sites within 1.3 miles of the planning area. At this time surveys by the BLM and USFS are not detecting birds in several historic sites and dispersal is not limiting within owl sites but would be treated and maintained. While dispersal habitat itself is not limiting in the watershed, it is located in northern spotted owl Critical Habitat for which dispersal habitat is an important component for the owl. The fuels specialist and silviculturalist believe that the purpose and need would be achieved without removing dispersal habitat within owl sites or dispersal stands (plantations), which would also serve to provide connectivity and dispersal, not only for spotted owls, but other taxa across the landscape.”* We have underlined the sentence in this response that is most concerning. Simply put, habitat removal was not analyzed because there were stronger voices against the analysis than for the analysis. AFRC would have liked to see this type of treatment analyzed, but we understand others involved in the iNEPA process would not. Due to the lack of agreement with the active participants, an analysis that has the heaviest treatment should have been analyzed to cover all of the agency’s bases similar to what was completed for the controversial motorized trail. AFRC writes in our EA comments, **“Did the FS conduct an analysis to determine whether the landscape contains a level of dispersal habitat sufficient to support dispersing owls? Only such an analysis would support the project design feature of having 40% canopy cover being maintained in all treated stands throughout the entire project area. Please specify the type of owl sites that overlap the project area and whether they are active. Would like to see the need (or not) to maintain all dispersal within the project area clearly stated in the final EA as well.”**

We also comment that gap sizes should be increased in order to create a more economically feasible project with increased fuels and restoration by-product removed. The response on page B-26 notes that, *“There is general agreement among biologists that openings of up to ¾ acres and no more than 20 percent of a given stand does not constitute a removal or downgrade of NRF habitat for northern spotted owls. The purpose and need of the project would be met by maintaining these NRF stands where they are located within high Relative Habitat Suitability per the 2011 Revised, Northern Spotted Owl Conservation and Recovery Plan (Appendix A). In those areas of lower suitability such as on southern facing slopes or on ridges, NRF will be downgraded to provide for other resource benefits. Creating openings larger than those specified in the UAWRP EA would not necessarily generate more revenue.”* We have underlined the sentences in this response that are most concerning. First, the project is downgrading NRF, so arbitrarily putting a limit on gap size and amount due to strict habitat requirements not being met, is pointless. Second, most of the Project area is dispersal habitat. Overlaying this restriction on the entire project restricts the ability of the prescriptions to most fully meet the Purpose & Need. Last, the response points out that larger gaps may or may not increase the revenue produced from the Project by utilizing the word “necessarily.” This means, the agency does not know and should have analyzed to see if they could have made the proposed action better. AFRC’s EA comments stated: **“[...] it is important to capture some revenue to pay for all of the other restoration activities proposed in this project. [...] AFRC believes**

**restoration and revenue creation are not mutually exclusive and by increasing openings from ½-¾ acre to at least 2 acres the FS and BLM can obtain both of these objectives. The increased openings would help improve fire adapted landscapes, create more growing space for trees left on the landscape and provide areas of browse for big game. These are but a few positive outcomes that could occur from this type of change.”**

### **Resolution Requested**

Given the restrictive project design features outlined above, AFRC believes that elements of the Purpose & Need are already being compromised. For example, the goal of “providing a mosaic of seral stages” will be hindered by capping thinning treatments to 40% canopy cover and gaps to ¾ acre. We ask that you not further degrade the attainment of the Purpose & Need. AFRC requests that the Deciding Official not eliminate or reduce any treatment from the proposed action. We request the maximum treatment take place as it was analyzed and disclosed in the EA. As such, the high end of the estimated volume outputs should be obtained leading to approximately 7,500 MBF of restoration by-products removed on 1,520 acres of the project area. As the current decision is a draft decision, potential exists for both the reduction of acres treated and the intensity of those treatments which would compromise the forest health and diversity goal, wildfire risk reduction goal, and small innovative forest products and restoration by-products goal described in the Purpose & Need.

### **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, Amanda Astor, 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".

Travis Joseph  
President