



VIA email submission: objections-pnw-siuslaw@usda.gov

June 25, 2020

Robert Sanchez, Forest Supervisor
Siuslaw National Forest
3200 SW Jefferson Way
Corvallis, OR 97331

RE: Deadwood Creek Environmental Assessment Statement Objection

Pursuant to 36 C.F.R. § 218.8, the American Forest Resource Council files this objection to the proposed draft decision for the Deadwood Creek Environmental Assessment. Central Coast District Ranger Michele Holman is the responsible official. The Deadwood Project occurs on the Central Coast Ranger District on the Siuslaw National Forest.

Objector

American Forest Resource Council
700 NE Multnomah
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 Deadwood 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 Director
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.

Because certain actions described in Alternative 3 of the Final EA do not meet the purpose & need of the project, incorporation of any of its elements would retard the attainment of the resource objectives that are identified in the Purpose & Need.

The Purpose & Need as it appears in the Final EA includes the following:

“Restore terrestrial habitat”

“Increase patch sizes of late-successional forest conditions”

We believe that 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.

In our scoping and Draft EA comments, we expressed concern regarding both the scientific validity and alignment with the Purpose and Need of the designation of “no-cut” buffers in alternative 3 that would result in a reduction of 145 acres of treatment and, consequently, the failure to meet the purpose and need on those 145 acres. Our Draft EA comments provided a review of the relevant marbled murrelet scientific literature and its lack of support for “no-cut” buffers along soft variable density thinning units. In those comments we stated that: *Page 118 of the EA states that “the application of buffers is not likely to provide benefits which outweigh their long-term negative aspects.” These “negative aspects” happen to apply to the project purpose and need, which is to accelerate the development of late seral habitat. Based on this analysis, we believe that **selection of any aspect of alternative 3 would clearly retard the project’s ability to meet the describe purpose and need to its maximum extent.***

We are pleased to see that the District appropriately considered the results of their robust environmental analysis and selected the alternative that best meets the purpose and need of the project. We urge you to maintain the project design selected in the ensuing Final Decision. Incorporation of any element of Alternative 3 would result in fewer acres treated to accelerate the development of late-successional forest habitat while providing no additional scientifically supported benefits to sensitive wildlife species.

Resolution Requested

AFRC requests that the Deciding Official not incorporate any elements of Alternative 3 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 the 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 stylized with a large, sweeping initial "T" and a cursive "Joseph".

Travis Joseph
President