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Title: Federal Timber Program Director

Comments: March 6, 2020

Michele Jones

Siuslaw National Forest Central Coast Ranger District

P.O. Box 400

Waldport, OR 97394-0440

In Reply To: Deadwood Creek EA Dear Ms. Jones:

American Forest Resource Council (AFRC) is a regional trade association whose purpose 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. AFRC represents over 50 forest product businesses and forest landowners throughout the West. Many of our members have their operations in communities adjacent to the Central Coast Ranger District, and the management on these lands ultimately dictates not only the viability of their businesses, but also the economic health of the communities themselves. The state of Oregon's forest sector employs approximately 61,000 Oregonians, with AFRC's membership directly and indirectly constituting a large percentage of those jobs. Rural communities, such as the ones affected by this project, are particularly sensitive to the forest product sector in that more than 50% of all manufacturing jobs are in wood manufacturing.

For over a decade, AFRC has been advocating for the Forest Service to manage its lands with an emphasis on the provision of a sustainable supply of timber products where appropriate; in terms of the Northwest Forest Plan (NWFP), these appropriate lands are those designated as Matrix. We believe that this provision is clearly identified in statutes such as the Multiple-Use Sustained-Yield Act (MUSYA), and that the guidelines contained in the Siuslaw Land and Resource Management Plan (LRMP) as amended by the NWFP were developed in accordance with this statute. The National Forest Management Act (NFMA) requires that projects be consistent with the relevant Forest Plan. 16 U.S.C. [sect] 1604(i). Here, the relevant forest plans are the LRMP as amended by the NWFP.

Where sustained-yield timber management can occur is a function of the land-use allocations (LUA) outlined in the NWFP and LRMP, and the objectives outlined for those LUAs. The NWFP clearly prohibits sustainable timber management on lands designated as Late-Successional Reserves (LSR's) where objectives of developing and maintaining late-seral forests are explicitly described. Therefore, lands designated as Matrix under the NWFP and as appropriate "Management Areas" (MA) under your LRMP are the only lands where treatments that address the concepts of long-term sustainable timber management can be applied. The Siuslaw's probable sale

quantity (PSQ) of 12 mmbf was determined and declared based on regeneration harvest occurring on these lands. The land allocations in the NWFP and PSQ delineated in the LRMP were formally adopted and should form the basis for determining what treatments are appropriate on any given piece of land.

We also believe that providing sustainable supply of timber products is a goal consistent with the agency's mission of meeting the needs of present and future generations. AFRC has also regularly pointed out that the "thinning-only" model that has dominated the vegetation management program across the NWFP area since the plan's inception is ultimately unsustainable and that some level of regeneration harvest will need to occur if the Forest Service intends to comply with the MUSYA and NFMA and offer timber products for sale in a sustainable manner.

During scoping for the Deadwood project, AFRC specifically requested that the District adhere to its LRMP as amended by the NWFP and recognize the clear distinction between management direction on lands designated as LSR and Riparian Reserve from lands designated as Matrix, and to 1.) develop a purpose and need to align with that direction; and 2.) develop an alternative with treatments on lands designated as Matrix to reflect that direction. We're disappointed to see that the District rejected this request and opted instead to ignore the Matrix/MA15 land allocation and treat those lands as pseudo- LSR. In fact, the EA is quite explicit on this treatment. Page 151 of the EA goes so far as to state that "the desired future condition for the project area was taken from the Late Successional Reserve Assessment (LSRA)." Page 18 of the EA states that "the matrix lands within the project area will receive the same protective measures afforded to other land allocations." We believe these statements are in clear violation of your LRMP and in violation of NFMA. It's frustrating that the Central Coast Ranger District seems so intent on blatantly stating in writing that you are applying "protective measures" described in your LRMP for LSR land allocations onto Matrix land allocations. How this practice is consistent with your LRMP and NFMA is puzzling to us.

Our comments above revolve around the fact that objectives on Matrix lands are different than objectives on LSR lands. We would like to remind the Siuslaw National Forest that the NWFP is an overlay of the 1990 LRMP. The NWFP did not replace the 1990 LRMP, but rather it amended it. In fact, the NWFP does not contain any explicit objective for the Matrix. Its language is vague and indirect. However, when this vague language is overlaid on the MA15 direction in the 1990 LRMP, objectives become clearer.

The "goal" of MA 15 are described in the LRMP and includes a resource focus of "timber, habitat for wildlife dependent on successional stages other than old growth, productive habitat for anadromous and resident fish, and public use of recreational features and opportunities."

The goals of Matrix lands described in the NWFP are ambiguous. Unlike lands designated as LSR, the NWFP does not clearly outline objectives for lands designated as Matrix but instead outlines Standards and Guidelines. These Standards and Guidelines simply establish sideboards and protective measures to apply when timber harvest occurs.

Therefore, we believe that since clear objectives for lands designated as Matrix are clouded in the NWFP, those clear objectives specified in the LRMP are the guiding components on lands designated as MA15/Matrix.

The Deadwood Creek EA failed to recognize this reality and failed to properly identify the objectives of those lands in the project area designated as MA15 in your LRMP and overlaid by Matrix. The result is an inappropriate purpose & need, and insufficient alternatives. The Forest Service should have recognized two distinct set of objectives appropriate for each land allocation and developed a unique set of treatments for each of these land allocations.

While our request for the District to simply follow its LRMP was rejected, a different request by another stakeholder group was deemed a "key issue" and adopted into an action alternative. Disappointingly, this "key

issue", and the subsequent action alternative, was based on personal opinions unsupported by scientific literature involving forest terminology absent from your LRMP. Why this request was deemed worthy of an alternative and AFRC's was not is also puzzling to us. This alternative is based on a stakeholder's belief that the Forest Service needs to protect "interior forest." (1) This stakeholder goes on to incorrectly claim that the 1997 Marbled Murrelet Recovery Plan "recommends a prescription of no-cut buffers." It does not. In fact, the ODFW Marbled Murrelet Status Review from 2018 states that "hard edges (recent clearcuts) tend to produce detrimental effects whereas 'soft' edges (regenerating forests) have lessened or not edge effects." Despite this scientific reality the District still opted to analyze this alternative. Naturally, the analysis in the EA clearly illustrates the futility and uselessness of applying the project design features developed for alternative 3 specific to the marbled murrelet and its habitat. Page 117 of the EA outlines goals specific to the marbled murrelet and states that "alternative 2 was designed to achieve these goals. Alternative 3, would as well, but to a lesser degree." Page 118 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.

In summary, it's very disappointing and frustrating that the Central Coast District continues to resist developing alternatives that are consistent with the land allocations described in your LRMP, while opting instead to develop alternatives that are based on elements absent from your LRMP and not supported by the current scientific literature. We also believe that the EA as written represents a violation of the requirements of NFMA by applying design features specific to lands designated as LSR onto lands designated as Matrix.

We urge you to 1.) not select any element described in Alternative 3 into the project decision record; 2.) modify the purpose and need of the EA to properly reflect the Matrix guidelines required in your LRMP; and 3.) develop an alternative that reflects this modified purpose and need by designing treatments on lands designated as Matrix to align with your LRMP.

REMOVED is happy to be involved in the planning, environmental assessment (EA), and decision-making process for the Deadwood Creek EA. Should you have any questions regarding the above comments, please contact me at REMOVED.

Sincerely,

(1) The term "interior forest" is absent from the Siuslaw LRMP.