



January 19, 2018

Michele Jones  
Siuslaw National Forest  
Central Coast Ranger District  
P.O. Box 400  
Waldport, OR 97394-0440

**In Reply To:** Indian Creek Landscape Management Project 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 76,000 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 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) as well as in your Land and Resource Management Plan (LRMP) as amended by the Northwest Forest Plan (NWFP). We also believe that this provision 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 offer timber products for sale in a sustainable manner.

As mentioned above, where these types of sustainable treatments can occur is a function of the land-use allocations outlined in the NWFP and LRMP. 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 and PSQ delineated in the NWFP and LRMP were formally adopted and should form the basis for determining what treatments are appropriate on any given piece of land.

It appears that the Siuslaw National Forest is blatantly disregarding the decisions made in the NWFP and LRMP by arbitrarily eliminating the distinction between the objectives appropriate to lands designated as Matrix and those appropriate to LSRs within the Indian Creek Landscape Management Project. This is extremely troubling to AFRC given our advocacy efforts to champion the notion that sustainable timber management is a worthy and appropriate goal for the Forest Service. Specific language in the EA, which we will address below, implies that the Siuslaw has essentially re-designated their entire land base as LSR without going through the formal process of a LRMP amendment.

The Indian Creek EA states that: **"...the purpose of the Project is to promote the development of late-successional forest by enhancing growth, health, stand structure, and diversity of forest stands."** In our scoping comments, we asked that the Central Coast Ranger District recognize the Matrix land allocation present in the Indian Creek planning area by designing and implementing vegetation management treatments that address the objectives unique to this allocation, rather than treating the entire project area as though it were designated as an LSR. The EA recognized this request and responded with: **"...the niche of the Siuslaw National Forest is restoration based, while private industrial timber lands center on timber production activities. To meet the restoration-focused purpose and need of this project, the proposed treatments are designed to "accelerate the development of late-successional structural characteristics in young managed stands for dependent species," and as such would maintain 60% canopy cover in stands identified as suitable habitat for the Northern Spotted Owl, and 40% canopy cover in dispersal habitat in the matrix and Late-Successional Reserves."**

Firstly, we are unclear as to how the management practices of neighboring private industrial timber lands are relevant to the direction of your LRMP as amended by the NWFP. Is the Forest Service implying that the objectives on private land are compelling the agency to manage their lands differently than described in your legally adopted LRMP?

Secondly, the EA is implying that the specialty, or “niche”, of the Siuslaw is conducting restorative treatments, and that those restorative treatments are being narrowly defined as thinning young stands to a minimum of 40% canopy cover to accelerate the development of late-successional characteristics across all land allocations. From this assertion, we can infer that either a.) the Forest Service believes that the objective of accelerating the development of late-successional habitat is consistent with your management plan direction for Matrix/MA-15 management or b.) the Forest Service’s “niche” supersedes your management plan direction. We would like the Forest Service to clarify this assertion.

The EA goes on to contradict the assertions above by stating that **“Due to slope instability and critical Northern Spotted Owl habitat, matrix lands within the project area would receive the same protective measures afforded to other land allocations.”** So, which is it? Are Matrix lands receiving the same protective measures (40%/60% canopy cover) due to the Forest’s “niche” or due to slope instability and/or NSO critical habitat? If it’s the latter, then is the Forest Service asserting that 100% of the 1,227 acres in the project area designated as Matrix/MA-15 are either composed of unstable slopes or designated as NSO critical habitat? We know that 100% of these acres are *not* designated as NSO critical habitat, so we can therefore infer that those acres are all “unstable.”

We would like to see the documentation of how all of those acres were determined to be unstable and how maintenance of a minimum of 40% canopy cover address slope instability concerns. We also would like some explanation of why lands designated as NSO critical habitat are being viewed as defacto LSR. In fact, in our scoping comments we included language taken directly from the final Critical Habitat Rule that asserts the opposite. This final rule explicitly asserts that: **On Matrix lands under the NWFP where land managers have a range of management goals, the Service anticipates that not all forest management projects in critical habitat will be focused on the development or conservation of northern spotted owl habitat (pg. 283).** It appears that the U.S. Fish and Wildlife Service recognizes that a.) Matrix land objectives are wide-ranging; and b.) those areas where the CHU overlaps the Matrix land are not to have a sole focus on NSO habitat.

Page 44 of the Indian Creek EA describes the “Desired Future Condition” for the landscape with the following passage: “The desired future condition for the Indian Creek Landscape Management Project area was taken from the Late Successional Reserve Assessment (LSRA) for the southern portion of the Oregon Coast province. The goal is a contiguous landscape of habitat for late-successional and old-growth related species including the northern spotted owl.” This document states that “this LSRA was developed to help facilitate implementation of appropriate management activities for the Late-Successional Reserve.” AFRC believes that it is inappropriate for the Forest to apply this direction to lands not designated as LSR’s and would like to hear why the Forest Service thinks otherwise.

All of our comments above revolve around the fact that objectives on Matrix lands are different than objectives on LSR lands. Page 41 of the EA attempts to define the objective of Matrix land. Here, the Forest Service copies an excerpt from the NWFP ROD. However, the Siuslaw seems to be forgetting 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 MA-15 direction in the 1990 LRMP, objectives become clearer. The Indian Creek EA failed to recognize this reality and failed to properly identify the objectives of those lands in the project area designated as MA-15 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.

Where appropriate, AFRC would like the Forest to design treatments that fully meet the stated purpose & need of promoting the development of late-successional forest by enhancing growth, health, stand structure, and diversity of forest stands. The silviculture report on page 52 of the EA correctly acknowledges the 2006 paper by Chan that concludes that thinning to low densities and under-planting has the potential to accelerate development of multi-layered stand characteristics. In the past, the Siuslaw has heeded this scientific evidence and treated their mid-seral stands accordingly. However, in recent years, AFRC has noticed a shift in how the Forest applies density management treatments in young, dense, uniform, mid-seral stands. This shift has resulted in “lighter touch” treatments that apparently are driven by the Forest’s policy of designing silvicultural treatments in a manner that would result in zero acres of NSO habitat downgrade or removal. This policy is not new. Siuslaw National Forest vegetation management projects have been designed to have low short-term impacts to the NSO and its habitat for over a decade. What seems to have changed is how those impacts are being considered in the context of density management treatments that remove a percentage of the forest canopy. The EA describes that each stand treated would “maintain” existing NSO habitat. This maintenance is what the project’s impacts to NSO habitat hinge on. Once again, this approach represents the status-quo for the Forest. What AFRC has noticed during its field visits to the project area is that the habitat determinations that dictate what habitat maintenance looks like, have become confusing based on the literature and consultation documents cited in the Indian Creek EA.

The Indian Creek EA splits the treatment prescriptions broadly as either those that can thin down a canopy cover of 40% and those that can thin down to a canopy cover of 60%. These thresholds are typical of treatments that aim to maintain either NSO dispersal habitat or NSO suitable habitat. Therefore, AFRC infers that those stands on the Indian Creek project that are labeled (on the included “Silviculture Map” on page 31 of the EA) as “40% Thin” were determined to be NSO dispersal habitat and those labeled as “60% Thin” were determined to be NSO suitable habitat. Page 66 of the EA states that “suitable habitat was derived from the 2016 Northern spotted owl suitable cover type model. Field visits were conducted to stands that had large trees and potentially other characteristics of suitable spotted owl habitat to determine whether or not they were on

the trajectory of suitability.” Our understanding, based on this explanation, is that the FS used a computer model to narrow down which stands may contain NSO suitable habitat characteristics, and then made field visits to those stands to confirm the model’s assumptions.

The EA also indicates that the definitions of habitat for spotted owls are discussed in the consultation documents for the project. These documents describe “suitable” habitat as “forested stands used for nesting, roosting, or foraging.” Stands suitable for nesting and roosting are described as “multi-layered, multi-species canopy with large overstory trees with average diameter at breast height of greater than 30 inches, a high incidence of large trees with various deformities, large snags, large accumulations of fallen trees and other woody debris.” The description in the EA of the proposed treatment stands clearly does not fit the above description of nesting and roosting habitat. Rather, the EA describes multiple times, that the stands proposed for treatment are “uniform, young managed stands.” Therefore, AFRC must assume that those stands being identified as “suitable” NSO habitat fall into the category of “foraging” habitat. The consultation documents describe foraging habitat as “similar to nesting and roosting habitat, but not containing nesting structures.” This document goes on to expand the definition as “younger forests with some structural characteristics of old forests..., hardwood forest patches, and edges between old forest and hardwoods.” One concern of ours is that the EA’s description of forest type does not coincide with either of these two foraging habitat descriptions. Another concern is that the actual stand conditions, based on our field visits, also do not coincide with those foraging habitat descriptions. We would like to gain a better understanding of how the Central Coast District is making these NSO habitat determinations, as they are having a significant impact on attainment of the project’s objective of accelerating the development of late-seral habitat. We would also like an explanation of how the habitat and forest descriptions contained in the consultation documents, as referenced in the EA, are reflective of the forest descriptions in the EA.

AFRC is happy to be involved in the planning, environmental assessment (EA), and decision-making process for the Indian Creek EA. Should you have any questions regarding the above comments, please contact me at 541-525-6113 or [ageissler@amforest.org](mailto:ageissler@amforest.org).

Sincerely,

Andy Geissler  
Western Oregon Field Forester  
American Forest Resource Council