



VIA email submission: objections-pnw-regional-office@fs.fed.us

June 4, 2019

Glen Casamassa, Regional Forester
Objection Reviewing Officer
Pacific Northwest Region
USDA Forest Service
Attn: 1570 Appeals and Objections
PO Box 3623
Portland, OR 97208-3623

Re: Kew Vegetation Management Environmental Assessment 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 Kew Vegetation Management Project Environmental Assessment. Deschutes National Forest Supervisor, John Allen, is the responsible official. The Kew Vegetation Management project occurs on the Bend-Fort Rock Ranger District on the Deschutes 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 Kew Vegetation Management 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.

- 1. Both alternatives 3 and 4 of the Final EA do not meet the Purpose & Need of the project and incorporation of any of their 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:

“Increase forest resilience to insect mortality through increased vigor”

“Increase forest resilience to fire through fuels reduction, promotion of fire-resistant tree species and larger diameter trees, and restoration of fire processes to the forest.”

“Increase the amount of stand structure with potential to grow into large tree structure.”

AFRC believes 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 EA comments, we expressed our support of the treatments analyzed in alternative 2 but deferred in alternatives 3 and 4:

- “With emphasis being put on maintaining the most fire-proof species such as ponderosa pine we recommend a strong regime of shelterwood harvests and removal of the trees such as white fir and lodgepole growing under and near the ponderosa pine canopies.”**
- “AFRC strongly supports the use of overstory removal, clearcuts, and seed tree harvests in lodgepole pine stands that have not been entered. This treatment is the only way the following two objectives will be met.”**

- **Reduce the potential for Dwarf Mistletoe spread to developing understories where past management has resulted in the establishment of a new cohort.**
- **Regenerate some of the lodgepole pine stands with high mountain pine beetle mortality in the last 10 or 20 years to create multiple age classes using seed-tree Cuts and Clearcuts.**

The EA describes the purpose of the seed-tree regeneration harvest treatments to reduce the infection of dwarf mistletoe in the young cohort and establish an overstory of healthy and diverse species. This treatment is critical to attaining all three of the purpose and need elements listed above. In particular, the seed-tree will help “increase the amount of stand structure with potential to grow into large tree structure” and also “increase forest resilience to insect mortality through increased vigor.” Deferral of these treatments through incorporation of any element of alternative 4, will ultimately retard the Forest Service’s ability to meet the purpose and need to its maximum potential.

The modifications to both selection harvest and commercial thinning analyzed under alternatives 3 and 4 will also inhibit the attainment of the purpose and need. The EA describes the focus of the commercial thinning to be the “reduction of tree density to maintain or improve tree growth, maintain or enhance forest health, and control species composition.” The EA describes the focus of the selection harvest to be the “promotion of ponderosa pine as a long term overstory and understory species.” Both goals tie directly to the purpose and need and the reduction of both treated acres and treatment intensity described in alternatives 3 and 4 will ultimately retard the Forest’s ability to meet those purpose and needs.

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. Table 9 in the EA, which summarizes each alternative’s attainment of the purpose and need, appears to validate this notion.

2. The analysis does not adequately disclose the rationale applied to the decision for the 8 miles of road decommissioning. The range of alternatives regarding road management is narrow and inadequate.

In our written EA comments, we expressed our concern with the proposed road decommissioning, and the IDT responded in writing:

AFRC is concerned over the number of roads that will be closed or decommissioned. AFRC is concerned about the cost and lack of access that decommissioning 8 miles of road will create.

Response: About 8 miles of road are proposed for decommissioning. The interdisciplinary team road analysis reviewed the road network within the project area. These roads will not be needed after implementation of this project. Several of these routes, have other nearby open or closed roads to access the general area. Fire suppression efforts would still have access, including road access, throughout the project area and decommissioning these road segments is not expected to hamper future suppression needs.

In particular we are concerned with the decision to decommission roads 4188-400 and 4100-120. The Deschutes Forest-Wide Travel Analysis Report identifies the “benefit” and “risk” of each road segment in order to guide management decisions. This Analysis states that **“the high risk/medium benefit and high risk/high benefit roads be the focus of road maintenance funds.”** The 4188-400 and 4100-120 roads were identified in the Analysis as low risk/low benefit and medium risk/low benefit respectively.

The Analysis also provides specific guidelines based on how each segment is classified. For low risk/low benefit, the Analysis recommends either decommissioning or closure. For medium risk/low benefit, the Analysis recommends closure, or decommissioning if there is no administrative or public need. The IDT determined to decommission both of these segments.

AFRC understands that certain road segments with high potential for resource risk need to be addressed by decommissioning. We also believe that an intact road system is critical to the management of the National Forest. We are concerned with the decision to decommission these two roads due to the guidelines in the Travel Analysis and the description provided in the EA. It seems that the guidelines in this Report would compel the Forest to a) not invest funds to address these two segments; and b) consider closure instead of decommissioning. Ultimately, we think that the Forest Service’s alternatives (all of which consider the exact same level of road decommissioning—8 miles) are too narrow and do not provide the decision-maker with the flexibility to consider multiple options regarding road management.

Resolution Requested

- 1) AFRC requests that the Deciding Official not incorporate any elements of the No Action alternative, alternative 3 or 4 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.
- 2) AFRC requests that the Forest Service expand on its decision to decommission the two road segments discussed, specifically as the decision pertains to the guidelines in the Travel Analysis Report. We also request that the Forest Service consider closure instead of decommissioning for these two road segments.

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 with a large initial "T".

Travis Joseph
President