



VIA: [objections-pnw-regional-office@usda.gov](mailto:objections-pnw-regional-office@usda.gov)

March 2, 2023

Regional Forester, Objections Reviewing Officer  
Pacific Northwest Region, USDA Forest Service  
Attn: 1570 Appeals and Objections  
1220 SW Third Avenue  
Portland, Oregon 97204

RE: Klone Vegetation Management Project, Environmental Assessment Objection

Pursuant to 36 C.F.R. Part 218.8, the American Forest Resource Council (AFRC) files this objection to the proposed draft decision for the Klone Vegetation Management Project Environmental Assessment (EA). Environmental Coordinator Alicia Bergschneider is the responsible official. The Klone 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 Klone 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

Corey Bingaman, Western Oregon Field Coordinator  
2300 Oakmont Way, Suite 205  
Eugene, Oregon 97401  
541-521-9143  
[CBingaman@amforest.org](mailto:CBingaman@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 Scoping Notice, which are hereby incorporated by reference.

- 1) The selection of Alternative 3 fails to meet the Purpose and Need of **“Move tree species composition and size class structure towards the historical range of variability.”**

The Purpose and Need as it appears in the Final EA includes, among other things, the following:

*“Move tree species composition and size class structure towards the historical range of variability”*

It is unclear how the Forest plans to accomplish this *need* of moving the project area towards a more variable forest utilizing only the tools of understory thinning and skips. If *variability* is the goal, then silvicultural treatments should be similarly varied to meet this end. Allowable treatments should grant land managers the flexibility to thin across diameters and apply gaps in equal measure, along with skips. Not only will the 21-inch diameter at breast height (DBH) standard fail to structurally diversify the stands slated for activity, Alternative 3 treats nearly 2,000 fewer acres compared with Alternative 2, leaving these stands in the same undesirable condition that this EA claims need treatment.

Although Alternative 2 maintains the same 21-inch DBH standard as Alternative 3, it also proposes a modest amount of shelterwood treatments—which should do well in meeting this *need* of the Project. The EA recognizes this fact, stating: “[the shelterwood treatment] is a way to increase the stand initiation structure stage and move that stage closer to the historical range of variability” (page 43) and “[s]helterwood treatments would provide more diverse age classes on the landscape” (page 12).

It is important to note that the 374 acres proposed for shelterwood treatment (or 1 percent of the plan area) currently host an abundance of lodgepole pine that have “reached culmination of mean annual increment and are falling apart” (Klone EA pg. 13). These lodgepole pine have grown under an open ponderosa pine overstory and are representative of the imbalanced forest structure that persists today due to fire exclusion and deferred management.

Alternative 3 proposes to either thin these stands or exclude them altogether. Neither of these actions will serve to incorporate species or size class variability into these stands. Furthermore, this decision runs counter to the Deschutes Forest Plan standards/guidelines TM-21, which states that: “Uneven-aged management is not appropriate in the lodgepole pine community types. Lodgepole pine should be managed using even-aged systems, and where possible, should be regenerated using seed trees and natural regeneration.” (p. 4-42).

The Draft Decision Notice/Finding of No Significant Impact (DN/FONSI) notes that your rationale for choosing Alternative 3 was due mainly to the concern over reduced mule deer hiding cover. We are aware that the Forest is in a difficult position of balancing opposing *needs* of forest resilience with maintaining cover for migrating deer. Considering the risk of leaving these stands untreated, we believe that priority should be given to treatments which favor forest health. The Deschutes Forest Plan standards/guidelines, again, echoes this priority in TM-57, which states: “The need for long term stand health and vigor achievable through stand density control should take precedence over the short term need for horizontal diversity beyond the minimums established in the standards/guidelines for deer and elk habitat diversity.” (p. 4-48).

### **Resolution Requested**

AFRC requests that the Deciding Official incorporate the 374 acres of shelterwood harvest in the Final Decision to fully meet the Purpose and Need associated with moving tree species composition and size class structure towards the historical range of variability.

- 2) The selection of Alternative 3 fails to meet the Purpose and Need of **“Reduce hazardous fuels so that forests can withstand uncharacteristically large disturbance events and create conditions where fire effects are within expected parameters for specific plant association groups should natural ignition occur.”**

The Purpose and Need as it appears in the Final EA includes, among other things, the following:

*“Reduce hazardous fuels so that forests can withstand uncharacteristically large disturbance events”*

Alternative 3 is insufficient to meet the *purpose and need* of reducing hazardous fuels to prevent uncharacteristically large disturbances. The same atypical forest conditions persist in the Klone project area as they do across much of the Central Oregon Cascades. Fire exclusion and deferred management has created a forest condition with little observable resilience or resistance to stand-replacing events. It is conceivable that, in the case such a disturbance event occurs in the project area, the treated stands will be inherently less-resistant if adjacent stands remain untreated. By simply treating more acres in the project area, Alternative 2 will better meet this *need* of the project.

The EA and Draft DN/FONSI satisfactorily highlight the gap between the two action alternatives. Following are some observations from AFRC for the EA and Draft DN/FONSI:

- Alternative 2 will result in 1,100 additional acres within the “desired category of less than 4-foot flame lengths” (table 3, DN/FONSI).
- Alternative 2 will remove 675 acres of additional forest from the category of 8-foot and greater flame lengths (table 3, DN/FONSI).
- Alternative 2 will remove an additional 1,190 acres of forest from a “passive crown” fire structure to a “surface” fire structure (table 4, DN/FONSI).

- Following treatment, Alternative 2 will result in 70 percent of the plan area below the upper management zone. Alternative 3 will result in only 64 percent of the forest below the upper management zone (tables 18, 22, Klone EA)

This last point illustrates the greatest difference between these two alternatives and why the selection of Alternative 2 is so important. The Draft DN/FONSI attempts to make the case that these differences are modest or immaterial when comparing these alternatives to the no-action alternative. Undoubtedly, compared with inaction, both action alternatives will serve to reduce hazardous fuels in the project area. But it is important to point out that following treatment, **Alternatives 2 and 3 will maintain stands above the management zone in 30 and 36 percent of the project area**, respectively. In other words, under the most “aggressive” alternative, one third of the project area will still retain tree densities that limit tree growth, are immediate fire hazards, and are susceptible to mortality from insects and disease. Ultimately, our contention is that none of the alternatives proposed will truly meet the *need* of this project. In the face of this reality, we believe the Forest should choose an alternative that does the *most* to meet this need.

### **Resolution Requested**

AFRC requests that the Deciding Official choose Alternative 2 as the Preferred Alternative in the Final Decision to fully meet the Purpose and Need associated with the reduction of risks associated with high-intensity wildfires.

### **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 resolutions. 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, will in the long run 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, Corey Bingaman, at the address and phone number shown above, to arrange a date for the resolution meeting.

Sincerely,



Travis Joseph  
President