



VIA online submission:

<https://cara.fs2c.usda.gov/Public/CommentInput?Project=68300>

December 19, 2025

Holly Jewkes, Forest Supervisor
Attn: Alicia Bergschneider
Deschutes National Forest
63095 Deschutes Market Rd
Bend, OR 97701

RE: Managed Stands Eastside Project Environment Assessment Objection

Pursuant to 36 C.F.R. Part 218.8, the American Forest Resource Council files this objection to the proposed draft decision for the Managed Stands Eastside Project Environmental Assessment. Crescent District Ranger Daniel Durfee is the responsible official. The Managed Stands Eastside Project occurs on the Crescent 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 Managed Stands Eastside 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, OR 97401
541-521-9143
cbingaman@amforest.org

Reason for 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. The Forest Service failed to include in the purpose and need statement of the Final Decision a *need* to produce commercial timber products via economic timber sales or integrated resource timber contracts (IRTCs) in lands designated as General Forest (MA-8) as described in the 1990 Deschutes Land and Resource Management Plan (LRMP).**

The Deschutes National Forest's 1990 Land and Resource Management Plan (LRMP) describes the goal for Management Area 8 General Forest (MA-8) is "to emphasize timber production while providing forage production, visual quality, wildlife habitat, and recreational opportunities for public use and enjoyment." The Managed Stands project proposes commercial and non-commercial treatment across 13,126 acres of lands designated as MA-8.

In our comments to the Draft Environmental Assessment, we urged the Forest Service to recognize the importance of the land base being managed within the project area, and to include in the purpose and need statement a *need* to produce commercial timber products via economic timber sales or integrated resource timber contracts (IRTCs).

While the Forest estimates that nearly 16 million board feet (MMBF) of commercial timber will result from the proposed action, there is no discussion or analysis which indicates that the Forest determined treatment intensity or desired conditions based on the principles of long-term sustained yield timber management. No mention is made of each stand's progress towards culmination of mean annual increment (CMAI), nor is there a predicted future timber flow as a result of the proposed actions. Therefore, there is no practicable means for the public to ensure that long term timber supply will be met with the proposed actions.

We believe that the only way to "emphasize" timber production is to include it in a project's purpose and need. AFRC members depend on a predictable and economical supply of timber products off Forest Service land to run their businesses and to provide useful wood products to the American public. It is critical to AFRC that timber production is recognized by the Forest Service as a valued objective on MA-8 land, and not simply a byproduct as it is on reserve land.

We understand that every treatment proposed on this project will likely be designed to meet numerous objectives, but one of those objectives, particularly on land designated as MA-8, should be the provision of timber products.

Resolution Requested

AFRC requests that the Deciding Official include in the purpose and need statement for the Managed Stands EA a *need* to produce commercial timber products via economic timber sales or integrated resource timber contracts (IRTCs).

- 2. The Forest Service's failure to consider for treatment all previously-managed stands within the Managed Stands Project Area would inhibit the attainment of several aspects of the purpose and need.**

The purpose & 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"

"Reduce undesirable impacts from insects and disease on land management objectives"

We believe the goal of any Forest Service vegetation management project should be to meet the purpose and need to the maximum extent across as many acres of the project area as possible. The scope, primarily measured in acres treated and timber volume offered, should be the metric that indicates how well the Forest Service is meeting the purpose and need 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.

Your Draft Decision Notice for the Managed Stands Project notes that, within the 83,000-acre project area, Alternative 2 will treat 13,515 acres (about 16%) to meet the purpose and need for restoring vegetation to more closely reflect historic conditions. For those remaining acres in the project area, the Forest Service has elected to defer treatment "because they are not within previously-managed stands." (Draft DN, pg. 4).

In our comments to the Draft Environmental Assessment, however, we pointed out several areas where management has previously taken place and where there is clear evidence that stocking and stand structure is currently outside of the Historic Range of Variability. In these stands, tree densities are high enough to contribute to significant crowding and tree mortality. Deferral of treatment in these previously managed units would retard the ability of the Forest to fully achieve the project's purpose and need.

For your consideration, we urge the Forest Service to observe the following map and photos depicting stands within the Managed Stands project area which are not proposed for treatment in your analysis:



Photo 1: T 25 S, R 08 E, Sec. 32 (Road Num. 5850000). According to publicly available records, this stand was treated most recently during the 1992 Plucker LP Salvage sale. Significant conifer mortality observed during a recent visit is likely the result of overcrowding and subsequent tree stress.



Photo 2: T 26 S, R 08 E, Sec. 05 (Road Num. 5850200). According to publicly available records, this stand was also treated most recently during the 1992 Plucker LP Salvage sale. While this unit is not displaying the same level of mortality as the previous stand (although some isolated mortality was observed), stocking is similar and mortality is likely to manifest if timely treatment is not implemented.



Photo 3: T 25 S, R 07 E, Sec. 22 (Road Num. 5834000). According to publicly available records, this stand was commercially thinned during the 2012 Weiser timber sale. Despite the recent treatment, this stand exhibits very high stocking which is likely departed from the area's HRV.

Resolution Requested

AFRC requests that the Deciding Official carefully examine all previously managed stands within the Managed Stands EA project area, and to consider treating any stand which exhibits tree densities above the historic range of variability and/or where stress-induced mortality is occurring.

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, Corey Bingaman, 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".

Travis Joseph
President