Chapter 3
Response to Issues, Concerns, and Opportunities

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Introduction

The Forest consists of complex environmental conditions. Different individuals and groups would prefer to see the Forest managed to emphasize varying outputs, uses, and conditions. Management to emphasize some resources can cause changes in others. These are called trade-offs, and trade-offs accommodate differing demands, because there are practical and natural limits to what the Forest can provide

Different preferences of individuals and groups are represented in the issues and concerns that guide the forest planning process.

A public issue is a subject of widespread public interest relating to management of the National Forest System. A management concern is an issue, a problem, or a condition identified by the Forest Service that affects the range of management activities in the planning process. A third component that influences alternatives comes from the various resource use and development opportunities suggested by both the public and the Forest Service These opportunities are the basis of many of the issues and concerns used in this planning process. The opportunity to preserve or develop the resources of the Forest is the focus of the alternatives. Alternatives developed to respond to public issues are displayed in chapter 2 of the FEIS

Additional information concerning the development of this list of issues may be found in appendix A of the FEIS.

Public Issues

This Forest Plan was developed in response to the following public issues:

Pelican Butte
Management of Former Klamath Indian Reservation Lands
Timber Management
Mule Deer Population Levels
Recreation Management
Wildlife Habitat Management
Firewood Availability and Accessibility
Mountain Pine Beetle Infestation

Each public issue is phrased as a question to be addressed in the planning process. These questions are highlighted in bold print. Following the issue question is the issue background statement, an overview of comments on the DEIS pertaining to each issue, and the resolution of the issue in this Forest Plan

Pelican Butte

Should the Winema National Forest maintain the option for development of a developed recreation area on Pelican Butte or maintain the area in an undeveloped condition?

Pelican Butte Issue Background

Pelican Butte is located near the community of Rocky Point, northwest of Upper Klamath Lake and east of the Sky Lakes Wilderness. The elevation is 8,036 feet. Portions of Pelican Butte have been considered for a downhill ski area since the early 1960's. In May 1973, the Forest Service filed an EIS on a major winter sports development on Pelican Butte. The EIS was based on a conceptual development rather than a firm development proposal In October 1973, the Forest Service decided not to issue a prospectus for development

The roadless portion of the butte, which contains the potential winter sports development area, was inventoried during the 1979 Roadless Area Review and Evaluation process (RARE II) as Sky Lakes-B6143 The FEIS for RARE II allocated Sky Lakes-B to nonwilderness. The Sky Lakes-B Roadless Area represents approximately 30 percent of the Forest's total remaining roadless resource that has not been designated as wilderness.

In 1979, approximately 4,100 acres of the northeast portion of Pelican Butte was designated for winter sports management in the McLoughlin-Klamath Planning Unit FEIS This included the option to study the area for development of a winter sports area

The city of Klamath Falls has contracted with a consulting firm to conduct studies of the area and to prepare a development plan In August 1989, the city submitted an application for a special-use permit to develop a year-round recreation facility, including a downhill ski area, on Pelican Butte. This proposal is consistent with management direction for the area in this Forest Plan The city's proposed development plan is currently being analyzed.

What People Said

The potential development of Pelican Butte as a winter sports area was one of the issues in the DEIS that received the most comment from the public. A majority of respondents favored the development of Pelican Butte as a winter sports area Primarily, they cited both the economic benefits of such a development to Klamath County and the personal advantages of having a downhill ski area closer to Klamath Falls.

The city of Klamath Falls, in its comments on the DEIS, said the potential development would be more accurately described as a winter sports area rather than as a downhill ski area Comments from the city included a tentative concept plan for the development, involving a total area of 5,400 acres and including terrain analyses, ski run and ski lift summaries, and location of Nordic, alpine, and base areas. In August 1989, the city submitted an application for a special-use permit to develop a year-round recreation area at Pelican Butte.

Many DEIS respondents who supported the development of Pelican Butte said the final Forest Plan should. allocate at least 2,000 additional acres to developed recreation to accommodate a range of winter sports activities, identify an acceptable access route on the eastern side of the butte, relocate the old-growth management area around the perimeter of the area, and establish visual management standards to allow the visual alteration that would accompany development of a ski area.

A number of other respondents said Pelican Butte should be managed to maintain developed recreation options on the 2,200 acres proposed in the DEIS Some of these respondents cited the need to maintain

commercial forestland in the land base as suitable for timber harvest, and others said further study would be necessary before designating additional acres.

Snowmobilers' Concerns

Some DEIS respondents who identified themselves as snowmobilers said they could not support designating more than the 2,200 acres, because enlarging the area would eliminate snowmobiling from the north side. They said 2,200 acres were adequate to meet local demand, and any increase in size would be only to lure people from outside the area. It would not make economic sense to these respondents to take a recreation area away from local residents to make more available to outsiders.

Other snowmobilers were concerned that turning Pelican Butte into a ski resort would lead to limiting snowmobiles to the trail skirting the butte and ultimately banning them from the area.

Sky Lakes-B Roadless Area

Some DEIS respondents said that Pelican Butte and the Sky Lakes-B Roadless Area provide vital wildlife habitat and are unsuited for ski resorts or logging Some of these respondents said the areas should remain roadless because of their value as undisturbed ecosystems Refer to appendix C of the FEIS for more information on Sky Lakes-B Roadless Area.

Other respondents said the Sky Lakes Wilderness was too crowded, and the roadless area was needed for wilderness recreation A respondent said any development would be visible from the Sky Lakes Wilderness Area and would damage the existing wilderness area

Further Study Needed

Some respondents, such as the Klamath Group of the Sierra Club, said more study was necessary before the Pelican Butte area was developed Some of those respondents suggested the type of development that they thought was appropriate· a moderately sized facility with low impact on the environment; day-use limits; no floodlights or night skiing; emphasis on cross-country skiing or muscle-powered recreation; minimal mechanization; and small scattered lodges and lifts rather than centrally located ones.

Some respondents questioned the feasibility of the development, saying in some years not enough snow for a ski area falls in this part of the State. Others noted a ski area in the same area already failed

Resolution

The Pelican Butte area, including all of the Sky Lakes-B Roadless Area, will be managed as a semiprimitive recreation area. Current authorized use of the area will be continued. The option to develop a portion of the area for recreation, including a winter sports site, will be maintained. The type and scope of development authorized and the area to be developed are currently being considered in a separate environmental impact statement

Management of Former Klamath Indian Reservation Lands

How should former Klamath Indian Reservation lands be managed to address the concerns of the Klamath Tribe?

Klamath Tribe Issue Background

More than one-half of the Forest is comprised of former Klamath Indian Reservation lands. Two purchases by the Federal Government, the first in 1963 of about 500,000 acres and the second in 1973 of about 135,000 acres, combined with portions of three other national forests to form the Winema National Forest

Several court decisions clarifying Klamath Tribe treaty rights have ensued since the 1954 termination of the tribe and later creation of the Forest In the first landmark decision, the court ruled that the Klamath Tribe's treaty rights for hunting, fishing, and trapping survived the termination of the tribe and sale of the reservation

The next significant court decision resulted in a consent decree that established a cooperative management and regulatory system between the tribe, the State of Oregon (Department of Fish and Wildlife), and the Forest Service.

In 1983, the U S. Supreme Court upheld a lower court decision on Klamath Indian water rights. The lower court's decision stated that the Klamath Tribe had water rights sufficient to support their hunting, trapping, fishing, and gathering rights.

These court decisions affected the relationship between the tribe and the Forest Service. Once its hunting, fishing, and trapping rights were affirmed, the Klamath Tribe began participating in the planning of Forest Service activities on former reservation lands This interest was further strengthened with the advent of the consent decree The tribe then hired a wildlife biologist to work directly with the Oregon Department of Fish and Wildlife and Forest Service biologists. A mutually beneficial exchange of data and information has occurred through this process

Tribal members actively participate in the project-level planning process. For projects scheduled on former reservation lands, the tribal biologist normally works with Ranger District interdisciplinary teams to develop alternatives that respond to the tribe's biological concerns In special cases at the Forest Service's request, draft alternatives may be reviewed by the Technical Advisory Committee This committee consists of the tribal biologist, biologists from the Fremont and Winema National Forests, an Oregon Department of Fish and Wildlife biologist, and at times a biologist from the Deschutes National Forest. Approved timber sale projects are reviewed by the Tribal Game Commission.

In 1986, the Klamath Indians were restored to federally recognized tribal status This has strengthened interest in management of former reservation lands.

What People Said

In its response to the DEIS, the Klamath Tribe commented on the special relationship between the tribe and the Forest Service, treaty rights of the Klamath Tribe, cultural and religious uses of the Forest, timber harvest methods and levels, deer and elk populations and habitat, fish habitat and water quality, alternatives, and Forest funding levels

The tribe said its relationship with and dependence on Winema National Forest lands extend beyond the exercise of hunting and fishing rights The physical characteristics of the Forest are of great cultural importance to the tribe and affect the tribe's ability to exercise its treaty rights. Specific sites and their

surroundings are one component of the treaty rights that is important for religious, cultural, and historical reasons The abundance and distribution of certain wildlife species are important culturally, as is the diversity of species throughout the Forest.

The tribe said all Forest Service actions, including development and implementation of the Forest Plan, must be consistent with its trust obligations to the tribe. The tribe pointed out that effects presented in the DEIS with respect to former reservation lands were calculated and estimated based on the Chiloquin Ranger District rather than the total former reservation lands. The tribe said the Forest must provide an analysis of each alternative's effects on the tribe, its treaty rights, and former reservation lands.

Resolution

The majority of the Upper Williamson River Corridor and a portion of the area around the Klamath Forest Wildlife Refuge will be managed according to Management Area 15 standards and guidelines. These guidelines call for managing the area for scenic, recreational, and wildlife purposes, generally consistent with tribal concerns.

In addition, approximately 14,000 acres around Saddle Mountain will be managed as a Unique Management Area in response to concerns about the area expressed by members of the tribe.

Timber Management

How much timber should be produced from the Winema National Forest, during what time period, *from which species groups, and from which size classes?*

What timber management activities should be used on the Forest? Where on the Forest should certain timber management activities be applied?

Timber Management Issue Background

Two-thirds of the harvestable timberlands in Klamath County are managed by the Deschutes, Fremont, Rogue River, and Winema National Forests. Thirty percent of the lands managed by the Forest Service in Klamath County are the Winema National Forest. The Forest has a standing inventory of 7.7 billion board feet of timber, nearly 50 percent of which is ponderosa pine. Lodgepole pine makes up about 17 percent of the standing inventory.

Sawtimber harvest on the Forest over the last 10 years has averaged 166 million board feet per year. Ponderosa pine comprised 49 percent of the harvest during that period Lodgepole pine averaged 23 percent of the harvest Recently, lodgepole pine harvest has increased rapidly to use dead and dying material killed by the mountain pine beetle infestation The harvest of true firs has remained fairly constant at about 18 percent of the harvest.

Past harvest of mature timber on private commercial forestlands in Klamath County has exceeded tree growth on these lands This harvesting is projected to decline in the near future while the remaining small trees grow to merchantable size.

The economy of Klamath County highly depends on timber harvest and manufacturing, which directly account for about 16 percent of local employment. The Forest historically (1985) supplied approximately 26 percent of the raw material processed by the Klamath Basin wood products industry. Individual mills vary widely in their dependence on raw materials provided by the Forest. In addition, Klamath County receives approximately 25 percent of the Forest's gross receipts which are used for schools and roads

In the past, timber harvest practices on the Forest have varied greatly Early practices on what is now the Winema National Forest used various forms of selection harvest systems Under the management of the Bureau of Indian Affairs and later the United States Bank of Oregon, Klamath Indian Reservation lands were harvested by selection harvest systems, leaving a continuous forest cover after harvest was completed In recent years, under Forest Service management, even-aged harvest systems such as clearcutting, shelterwood, or overstory removal have been the dominant harvest method.

What People Said

Some respondents to the DEIS said that the Forest should be managed like a crop, being harvested and reforested with the latest knowledge and technology. These respondents said that if timber is to be harvested as a crop, it should be harvested before it goes to waste, and the Forest should work harder to protect the residual stand

Other respondents said they did not want industrial type forests on public lands. They said they were concerned that the trend under the preferred alternative is to convert the Forest into a giant tree farm and cattle ranch rather than to keep it as a natural forest producing clean water, fish, wildlife, recreation, and timber

Quantity of Ponderosa Pine in the Allowable Sale Quantity

Many DEIS respondents, including the Coalition for Wise Forest Use, said ponderosa pine is the Forest's most valuable species and the most important species to the area's timber industry They said it is absolutely imperative that the final Forest Plan maintain the ponderosa pine component of the timber sale program at 90 million board feet at least over the next 10 years Some of these respondents said that level can essentially be maintained on a cubic foot basis for the next 50 years, although the board foot volume will decline in future decades, due to the smaller diameter of second-growth stands.

Departure

Many respondents to the DEIS were opposed to any departure from even flow sustained yield based on ecological, aesthetic, and recreational perspectives Some of these respondents said all timber harvest should be on a sustainable yield basis, because our forests must serve all generations to come, not just ours

Some respondents said harvest levels of ponderosa pine should not be increased above the even flow level to contribute to the economic stability of the local community These respondents said that is neither an appropriate basis for such a departure nor a viable contribution to the long term stability of the community. They said sustained yield management would lead to more moderate reductions in the timber supply and related employment in the short term but would lead to more stability in the long term.

The Klamath Tribe said it was particularly concerned with the proposed lodgepole pine departure, because lodgepole has far more value as deer fawning habitat or sustaining other resources than it does as sawtimber sold on occasion at a loss The tribe said proposed harvest levels should be reduced to a sustained yield rate to allow adequate dispersion of harvest units and to provide adequate cover and forage for deer and elk.

The Oregon Department of Fish and Wildlife said it objects to departure alternatives, because Forest wildlife resources would be rapidly diminished by accelerated modification or loss of habitat. The ODFW said departure timber harvest schedules risk the even flow of recreational and commercial opportunities associated with fish and wildlife.

Many timber industry representatives supported the departure harvest schedule for lodgepole pine proposed in the DEIS preferred alternative. They said the Forest should consider completely isolating the lodgepole pine working group in analyzing data and reporting results in the final plan. Some of these respondents said they supported departure for the lodgepole pine working group but not for other working groups.

Although the Oregon Department of Forestry said a departure harvest schedule should be given serious consideration in the decision-making process, any departure schedule should be regulated by a plus or minus 10-percent harvest change per decade to avoid the social disruption likely with large changes in timber harvest levels.

Uneven-Aged Management

A wide spectrum of DEIS respondents--including individuals, State and Federal agencies, conservation groups, and members of the timber industry--expressed support for uneven-aged management. They cited a variety of benefits from that type of management Respondents said uneven-aged management allows adequate levels of timber harvest and at the same time helps to maintain visual qualities, wildlife habitat, and recreational opportunities.

Many respondents encouraged the use of uneven-aged management on more than the 144,000 acres proposed in the DEIS preferred alternative Some respondents said uneven-aged management should also be considered for the pine associated and mixed conifer working groups where root rot and mistletoe are not a problem. Other respondents said the Forest should consider uneven-aged management in the mixed conifer working group to address the need to retain thermal cover in those stands with major frost problems

Some respondents said uneven-aged management would make harvest activity less visible from main travel routes, therefore, a relaxation of restrictions on timber harvest in some visual management areas should be allowed. Other respondents said the use of uneven-aged management should also allow a reduction in the number of acres of suitable timberland set aside to preserve old-growth wildlife species and for dispersed recreation

The Oregon Nature Conservancy said uneven-aged management in ponderosa pine needs to be coupled with a prescribed burning program to ensure that the stands do not convert to pine associated or fir dominated stands.

Respondents encouraged the Forest to consider leaving trees larger than 24 inches in diameter under uneven-aged management. They said a classic uneven-aged forest has trees representing all diameter classes, ages, and species. By removing all trees larger than 24 inches in each entry, the Forest could be losing a significant component necessary for regeneration, site productivity, and wildlife. Other respondents said they want to see uneven-aged management with longer rotation periods.

Some respondents noted that uneven-aged management is not the answer to all problems. They said that by some estimations, there is a growth liability of at least 30 percent moving from even-aged management to uneven-aged management. They said the costs of shifting to more uneven-aged management should be more clearly explained in the FEIS

The Coalition for Wise Forest Use said that in terms of uneven-aged management, its only concern was the possibility of overdoing a good thing. The coalition said uneven-aged management is an appropriate silvicultural tool in some situations and is not appropriate in others. The FEIS should examine the potential trade-offs very closely. It also should emphasize uneven-aged management in the final Forest Plan where it makes biological sense and where it can be used without significantly reducing the Forest's overall timber production potential.

Some respondents said the uneven-aged yield tables for ponderosa pine (tables used to predict growth of timber stands) were too conservative, and should be updated Some of these respondents, including the Oregon Department of Forestry, suggested using the PROGNOSIS computer model that was recently calibrated for south-central Oregon and that may indicate greater growth than the yield tables used in the DEIS.

Other respondents said the Forest's yield tables were definitely optimistic. Some of these respondents said timber yield estimates should be calculated with a large margin of error to prevent disastrous results if the estimates are too high.

Conversion Factor

Some respondents requested additional explanation and analysis regarding the conversion factor used to convert the allowable sale quantity from cubic feet to board feet. A number of respondents said planning allowable harvest levels in cubic feet and measuring actual harvest in board feet would cause the Forest to overcut early in the rotation and to undercut later in the rotation. The Coalition for Wise Forest Use said the conversion factor seems very conservative and may underestimate the actual flow of board feet in the first decade

The Klamath Tribe said it appears that the use of cubic feet distorts the decline of timber available in the future; if a steady flow of cubic feet is maintained, board feet will decline over time.

Old Growth

Many DEIS respondents who used the conservation group response form said the Forest should preserve at least 10 percent of all forest/timber types in old growth. The value of old growth as wildlife habitat and its contribution toward maintaining plant and animal diversity were mentioned frequently as reasons for the preservation of old growth.

A number of respondents said the Forest should manage replacement stands for the renewal of old growth Other respondents looked at old growth as a nonrenewable resource They said once it is gone, it is gone forever

Respondents from the timber industry expressed concern that national forests may be setting aside more old growth than is actually needed to maintain healthy wildlife populations and imposing needless economic and social costs on Oregon's timber-dependent communities as a result. Some of these respondents, including the Coalition for Wise Forest Use, said they support the temporary protection of the 29,000 acres of old-growth stands designated in the DEIS as necessary to meet the Forest's management requirements. The coalition said monitoring should be conducted to assess the impacts of the harvest of old-growth timber on old-growth dependent wildlife species.

Timber Managements Effects on Scenic Quality

Many respondents to the timber industry questionnaire supported reducing the level of emphasis on visual quality where necessary to maintain current timber sale program levels. The most frequently stated reasons for reducing visual quality emphasis were jobs and the economy. However, some of those respondents cited the need to harvest timber while ensuring that the environment is left capable of rehabilitation and the need to include well-planned, aggressive slash cleanup

Several timber industry representatives, such as the Coalition for Wise Forest Uses and the Southern Oregon Timber Industries Association, recommended that visual corridors be managed only along Highways 140, 97, 62, and 138.

Other respondents believed that visual quality was a very positive force for proper management Generally, those respondents who wanted to maintain and protect scenic quality cited recreation and tourism, although several stated that priority should be given to treatment of disease and insect infestation such as the mountain pine beetle epidemic in lodgepole pine.

The State of Oregon stated that as a contributor to the setting for the increasing tourist industry in Klamath County and the quality of life in Oregon, scenic quality is a resource that must be carefully considered in the Forest Plan. The Washington Native Plant Society believed that the proposed timber and roading program will reduce the Forest's scenic quality index and substantially affect the quality of life, recreational values, and tourism This may have a significant long-term negative effect on the local economy.

Some respondents believed that managing the foreground area as seen from roadways should be expanded beyond those areas specifically mentioned in Alternative E, especially along main arteries and near dwellings. The Visitor Industry Association of Klamath Rivers stated that protecting primary roads alone will not do the job, because the secondary roads give inviting access to travel routes and recreational sites.

Crater Lake National Park expressed a desire for the views from Rim Drive and the summit of Mount Scott to remain natural appearing as described in the plan's visual condition illustration

Several respondents called for balanced management with consideration for both scenic quality and timber management.

Resolution

Ponderosa pine production will be emphasized using uneven-aged management.

In the lodgepole pine working group, dead lodgepole pine will be aggressively harvested over the next decade.

Uneven-aged management will be used in all the ponderosa pine working group and approximately half the pine associated working group.

About 10 percent of the ponderosa pine working group will be retained in allocations to protect old-growth character for purposes of ecosystem preservation, wildlife habitat protection, recreation, and aesthetic benefits. This means that an additional 23,000 acres of mature ponderosa pine are being preserved as old growth above management requirements.

About 2,000 acres of old-growth forest on the Klamath District will be retained above management requirements for recreational and scenic purposes
In foreground areas of uneven-aged scenic management, the target diameter tree will be 36 inches for retention and 26 inches for partial retention

Departure

The preferred Forest Plan uses a nondeclining harvest schedule based only on the live-green timber component (that is, excluding dead lodgepole pine).

Mule Deer Populations

What types of Forest management should be used to support the mule deer populations using the Winema National Forest? How much of the Forest should be managed to specifically support mule deer populations?

Although aspects of this issue are covered under the management of former Klamath Indian Reservation lands issue, mule deer populations are addressed here to emphasize that concern for deer populations is a forestwide concern and not limited to former reservation lands.

Mule Deer Issue Background

The Forest Service is responsible for the management of habitat, and the Oregon Department of Fish and Wildlife is responsible for management of wildlife populations. The Klamath Tribe has historically used mule deer as its primary hunted subsistence species. The U.S District Court reaffirmed tribal subsistence hunting rights and directed the tribe to promote the sound and efficient management of wildlife resources on the former reservation lands, in cooperation with the State of Oregon and the Federal Government

All lands within the Forest are considered to be suitable mule deer range. Although winter range is considered a key habitat factor that affects mule deer populations, the Forest is primarily summer range. Approximately 47,000 acres of the Chiloquin Ranger District meet winter range habitat criteria, but most of the lower elevation winter range occurs off the Forest on other public or private lands. Most of the suitable winter range occurring on private lands adjacent to the Forest has been converted to agricultural lands or subdivided into rural housing tracts; this severely impacts the area's capability to support winter deer populations.

The mule deer is the most commonly hunted big game animal in Oregon. Population levels of mule deer in this area historically have been good. However, the mule deer population exploded in the mid-1950's and destroyed forage base on some winter ranges. Populations then dropped drastically and bottomed out in the early 1970's throughout the western United States and Canada. Most of these populations have since recovered; however, some of the local populations have not recovered to levels where they should be, according to biologists for the Oregon Department of Fish and Wildlife, the Klamath Tribe, and Forest Service, and the public.

What People Said

Cover

Many DEIS respondents who commented on mule deer noted the importance of cover to mule deer and expressed concern about the effect of timber harvest and other activities on cover. Some respondents, including the Oregon Hunters Association, said that well-distributed thermal and hiding cover is essential for maintaining healthy wildlife populations. The association said it was concerned that the proposed rapid conversion of lodgepole pine, the departure harvest schedules in both lodgepole and ponderosa pine, and even-aged management would reduce cover far below acceptable levels

The Oregon Department of Fish and Wildlife said the conversion of 74.2 percent of mature lodgepole pine stands in two decades will have significant long-term impact on cover forage ratios for big game. The ODFW said dead lodgepole stands provide big game cover, although they are not optimum quality. Proposed rapid liquidation of timber stands would have significant effect on diversity of plant and animal species

The Oregon Natural Resources Council said summer and transition range for the eastern two-thirds of the Forest has a higher need for cover than the western third of the Forest. The ONRC recommended that cover be kept up to the 30-percent to 40-percent level in the middle third of the Forest and at the 40-percent to 50-percent level on the eastern third of the Forest.

Roads

Most comments on the DEIS that addressed roads focused on the effects of open roads on big game. There was overwhelming support for road closures to enhance deer or elk security. Some respondents supported seasonal road closures, and others supported closure of logging roads once harvest was completed and the roads were not needed. Most who supported closures wanted the roads completely closed and revegetated; however, some respondents supported administrative closures to allow access for fire suppression and other activities

The current road density on the Forest (about 4 miles per square mile) was said to be excessive by many respondents. The Oregon Hunters Association said the amount of required cover on summer range is closely tied to road density· the higher the road density, the more cover required The State of Oregon said road management and closure provide a management technique crucial to maintaining effective big game habitat. The Oregon Department of Fish and Wildlife recommended a goal for roaded modified areas be no more than an average of 2 miles of open road per square mile in deer-only areas and no more than 1 5 miles (average) of open road per square mile in elk and deer areas.

Forage

The Oregon Department of Fish and Wildlife said it did not agree with the Forest's assumption that deer numbers are directly related to available forage production. The Oregon Hunters Association said it did not believe that forage is a major forestwide limiting factor for deer; forage may be limiting in certain winter ranges but is not limiting on summer range. The Oregon Natural Resources Council said forage needs to be addressed in terms of nutritional quality index. The Klamath Tribe noted the type of forage projected to be produced is not identified in the DEIS and said the Forest should describe and quantify the activities proposed to increase forage production.

Timber Harvest and Mule Deer

Some respondents to the DEIS noted that timber harvest can be advantageous to big game. Western Wood Products Association said browse availability is the primary critical factor in over-wintering deer, and this resource is most compatible with productive forest management. One respondent suggested the Forest clearcut for 2 acres every 5 square miles and plant alfalfa or sweet clover with a little bitterbrush and mountain mahogany for mule deer.

Some respondents were opposed to any reductions in the allowable sale quantity as a result of computerization of thermal cover, forage, or other habitat effectiveness indexes. Ellingson Lumber said those indexes cannot be proven at this point, and reducing the cut because of them is not sound forestry practice

Crater Lake National Park said timber harvest proposed under the preferred alternative would increase deer and elk populations in the Forest and that no consideration was given as to whether those increases would adversely affect the park. The park's concern is that if the herds increase above existing levels, it would have an adverse impact on vegetation diversity and structure in the park.

Resolution

Vegetative cover and forest access will be managed to reduce the effects of harassment and to improve use of the Forest by mule deer. Both hiding cover and limited visual screening will be used to reduce harassment.

Roads on the Forest will be managed to mitigate any lack of cover. The desired future condition will be the closure of all roads not needed to meet management direction or provide public access.

After a series of internal and external meetings, the Forest has concluded that forage is one of the key limiting factors that influences local deer numbers The improvement of forage for mule deer will be emphasized as rapidly as possible, consistent with other land use objectives. The short-term forage composition that will be sought is grass/forb with a limited shrub component.

Precommercial thinning will be reduced where necessary to meet minimum mule deer hiding cover needs.

Recreation Management

What types of recreation settings and opportunities should the Winema National Forest provide?

Recreation Management Issue Background

The Forest offers a variety of dispersed recreation opportunities. The most common include activities associated with the use of Forest roads traversing a natural-appearing forest Approximately 91,000 acres are available for the solitude and naturalness offered by wilderness.' In addition, approximately 32,000 acres of roadless lands offer roadless recreation opportunities outside a designated wilderness; only about half of these tracts are of sufficient size to offer the opportunity of solitude and naturalness associated with a semiprimitive recreation experience.

Historically, dispersed recreation opportunities on the Forest have been very similar to those available today These are hunting, fishing, viewing scenery and wildlife, backpacking, and camping. In recent years, interest in using the Forest during winter months has increased The popularity of snowmobiling and cross-country skiing has made the Forest a favorite area of many winter recreationists The recent increases in winter use have resulted in some conflicts among motorized users and between motorized and nonmotorized users in the more popular areas of the Forest.

In recent years, there has been a trend from the natural-appearing forest that most users have become accustomed to seeing to a more modified appearance that is associated with some Forest management activities. This trend has begun to concern some user groups. This increasing concern over the reduced amount of undeveloped land has often resulted in demands for additional roadless areas to be made available for unroaded dispersed recreation

What People Said

Trails

The need for more trails on the Forest was raised by many DEIS respondents. Some respondents said hiking trails have an economic value, and the visual resources seen from all hiking and riding trails should be protected. Respondents suggested a number of areas where trails should be built, including Devils Garden, Williamson River Gorge, and Brown Mountain. Respondents also said a trail along the Williamson River between Collier Park and Kirk Bridge would provide an area that has a lot to offer the

day hiker or physically challenged individual. Some respondents said narrow and winding low standard trails constructed along land contours would be the type of trail most preferred by the average hiker.

Nonmotorized and Motorized Recreation

A number of DEIS respondents discussed nonmotorized versus motorized recreation. Some respondents said that because of a great user conflict between nonmotorized and motorized trail use, off-road vehicles (ORVs) should not be allowed on established hiking trails. Some respondents identified specific areas where ORVs should be prohibited; they include riparian areas to prevent resource degradation and all trails leading into established wilderness areas Other respondents said all ORVs and all-terrain vehicles should be banned from the Forest

Other respondents said they had never experienced a user conflict. No trails should be designated for a single use, and trails should be open to motorized recreation, horses, and hikers. Some of these respondents said wilderness, old-growth, minimum management, and riparian management areas provide ample room for nonmotorized dispersed recreation

Some respondents said the Forest should develop a system of Jeep trails, primitive roads, or trails suitable for travel only by four-wheel-drive vehicles They suggested those trails could be developed under the adopt-a-trail program. In addition, respondents said the Forest should not consider four-wheel-drive vehicles to be in the ORV category, because law abiding use of four-wheel-drives occurs on roads.

Other respondents said they want to see more trails open to ORVs, and if more trails were open, the Forest should make that information more available.

Some respondents advocated keeping all wheeled vehicles, including mountain bikes, off trails that could be damaged by their use. Other respondents said mountain bikes should not be included with other vehicles, and they should be allowed where horses are allowed

Horseback Use

DEIS respondents who commented about horseback use addressed the need for facilities to accommodate riders, such as larger parking areas, water developments, and camps separate from hiker camps. Some respondents said wilderness regulations for horse use were too limiting, especially the regulations restricting group size.

Intertie Trail

Respondents who addressed the east-west Intertie Trail proposal gave overwhelming support for development of the trail This trail would connect the High Desert Trail east of Lakeview with the Pacific Crest Trail on the summit of the Cascades.

Differences were expressed on which alternate routes should be developed and what level of construction and management would be appropriate for the trail and trail corridor. The southern route was cited as scenic by many respondents, others said the northern route would create far less conflicts with private land and would provide a more direct route

In terms of management, some groups, such as the High Desert Trail Riders, said motorized vehicles should not be allowed, except where the trail may be on a road that is open to vehicles In addition, those groups said the trail should not be considered a wilderness trail with a scenic protection corridor, but it should provide the user with views of various stages of silvicultural and other management activities.

Roadless Areas

Most DEIS respondents who commented on roadless areas addressed the issue in general; however, a number of respondents cited specific resource values as why particular roadless areas should remain roadless.

Many respondents said the roadless lands released for multiple-use management in the 1984 Oregon Wilderness Act should be made available for a broad range of multiple uses and should not be reserved for semiprimitive roadless recreation The need to make these lands available for timber harvest and roaded recreation was frequently cited by these respondents.

Other respondents wanted all remaining roadless areas on the Forest maintained in a roadless condition. Some of these respondents said that because roadless areas represent such a small percentage of the total Forest, they should be left alone for wildlife, dispersed recreation, and watershed protection. Other respondents said roadless areas adjoining wilderness areas should be kept roadless when they contribute to more ecologically sensible boundaries for the wilderness area.

The Oregon Department of Fish and Wildlife said it generally recommends retention of roadless areas to help meet hunters' demand for a semiprimitive hunting experience and to provide areas of undisturbed habitat for fish and wildlife

Winter Recreation

Some respondents said that with the increased interest in cross-country skiing, the Forest should provide more cross-country recreation in the form of trails, rather than roads, that are also closed to snowmobiles Respondents suggested the road system on the Chemult Ranger District should be made available to snowmobiles and cross-country skiers in two separate trail systems. Other respondents said most conflicts between snowmobilers and cross-country skiers could be resolved by trail zoning and by providing adequate parking space, because most conflicts are the result of competition for parking. Some respondents said snowmobiles should be considered at the same level as cross-country skiing in terms of environmental impact

Wild and Scenic Rivers

Many respondents supported the wild and scenic designation for the Sycan and Williamson Rivers. Some of these respondents said designation would have little adverse impact on timber production and would have significant positive effect on recreation and fishing

Some respondents said the Sprague River provides habitat for the Lost River sucker, and the Williamson River provides habitat for the shortnosed sucker. The presence of those two fish (the Lost River and shortnosed suckers were listed by the Fish and Wildlife Service as endangered in August 1988) indicated to those respondents that the rivers deserve recommendation for scenic or recreation status.

Other respondents did not support a wild and scenic designation for any of the rivers. They said the publicity and subsequent flood of people that designation would bring would destroy the very qualities of the rivers that they enjoy.

Resolution

Additional trail construction will be programmed, primarily outside wilderness, to provide hiking and horse use.

Off-road vehicle use will be allowed on most lands, unless such use causes unacceptable damage to resource or facilities

A feasibility study will be conducted to determine a route for the Intertie Trail. If it is found feasible, the Forest will program the construction as a future capital investment project.

All lands within a manageable boundary for Brown Mountain and Yamsay Mountain Roadless Areas will be managed for semiprimitive recreation

The Sycan River will be managed as a National Wild and Scenic River with no harvest of timber below the canyon rim. The standard of scenic foreground retention will be applied to the areas having harvest as viewed from the river.

Wildlife Habitat Management

How much, what types, and what distribution of wildlife habitat should be managed for on the Winema National Forest to support the variety of wildlife currently inhabiting the Forest?

Wildlife Habitat Issue Background

The Forest's existing diversity of plant communities supports a broad spectrum of wildlife communities and populations The National Forest Management Act and its planning regulations require that national forests be managed in such a way as to maintain viable populations of existing native and desirable introduced species in the planning area To fulfill this requirement, the Forest must provide habitat to support at least a minimum number of reproductive individuals in a distribution pattern that allows for enough interaction to maintain viability.

The Forest provides habitat for 368 species of wildlife throughout all or part of their life cycle. Habitats to support the current diversity of wildlife species on the Forest are generally adequately spaced to provide for reproductive interchange and are in relatively good condition. Natural and induced vegetative changes presently occurring on the Forest are modifying the habitats of some individual species, resulting in their movement to other areas on or off the Forest.

Five species on the Forest are classified as threatened or endangered. The bald eagle is classified as threatened and appears in resident and wintering populations. Habitat for existing and recovery populations of bald eagles is available and in good condition. The northern spotted owl, classified as threatened, is the subject of a great deal of concern regarding old-growth ecosystems. The spotted owl is a breeding species, and a recovery plan has not been developed. The shortnosed and Lost River suckers are both classified as endangered, and they occur in the Williamson River system on the Forest Their populations appear to be declining due primarily to poor water quality in Upper Klamath Lake, and no recovery plans have been completed. The peregrine falcon, classified as endangered, historically appeared as a breeding species but now only appears as a foraging or migratory species.

Over the years, land use practices on and off the Forest have resulted in a different balance of habitat availability, wildlife species, and populations. Some species, such as the wolf and grizzly bear, were not adaptable, and have been eliminated from this portion of their range. Dam development on the Klamath River, outside the Forest boundary, has eliminated anadromous fish runs from the Klamath Basin.

In general, private lands in the Klamath Basin were developed earlier and more extensively than public lands This has resulted in greater modifications to wildlife habitats and the associated wildlife species on private lands. Public lands have become the last major source of some key wildlife habitats such as old growth

What People Said

Riparian Habitat

The majority of comments on the DEIS addressing riparian areas focused on livestock grazing and its effect on riparian areas Many respondents said the Forest should conduct a full assessment of environmental impacts of grazing on riparian areas They also suggested grazing should be excluded from riparian areas that are in poor condition. Some of these respondents said perhaps excluding livestock from riparian areas would help bring the Forest's trout streams up to their full biological potential.

The Oregon Hunters Association said that if livestock use of wet meadows is allowed, that use should be tightly controlled and no forage allocation should be made from the meadows. The Oregon Department of Agriculture said the Forest should not overlook use of livestock as resource management tools to meet riparian and forage goals. In addition, fencing to provide seasonal exclusion, development of alternative watering facilities, and placement of salt away from riparian areas can reduce the impact of livestock grazing on riparian zones.

Many respondents addressed the importance of riparian areas to wildlife Most respondents to the conservation group response form said they wanted riparian areas protected for fisheries and wildlife. Some respondents said riparian areas contribute to maintaining water quality. They said plant and animal diversity is important enough to outweigh timber benefits, and all riparian areas should be removed from programmed timber harvest.

Other respondents said careful, selective logging in riparian areas could be accomplished without damaging the areas

Some respondents said buffer strips along streams, wetlands, and lakes should be used to protect riparian habitat. Other respondents said they disagreed with predesignated protection strips of so many feet They said the design of any protective area should be fitted to the biological characteristics, soil, topography, and other physical features of the site Some respondents said that because overland flow is not significant on the east side of the State, buffer strips for shade make sense but have little value as a filtering mechanism for sedimentation.

The Nature Conservancy said the Forest has a huge inventory of springs and wet meadows providing significant riparian habitat that need to be mentioned in the management area guidelines The Oregon Department of Fish and Wildlife recommended no timber harvest be programmed in wet or moist lodgepole pine sites subject to regeneration problems Respondents specifically mentioned Sellers Marsh and Jack Creek as areas needing more protection.

Bald Eagles

Many DEIS respondents who commented about bald eagles said they wanted all known suitable eagle habitat to be managed as such. Some respondents said that because the understanding of eagle habitat requirements is still rather rudimentary, it would seem safer to allocate additional acreage to eagle management Other respondents said they want to see buffer areas around bald eagle nest sites and winter roost areas increased to provide more protection from human disturbance. Some respondents specifically mentioned the Marsh Roadless Area and areas east of Upper Klamath Lake as needing protection as eagle habitat.

Other respondents said they supported the preferred alternative's designation of 17,000 acres for potential nesting and roosting areas. Other respondents said the plan to protect bald eagles on the Forest was too restrictive to other uses

The Boise Cascade Corporation said it supported growing some timber stands at wide spacing to develop quality eagle roosting habitat The company said that unless studies prove this is not possible, it does not support setting aside suitable timberland for roosting habitat. However, the company does support avoiding harvest in roosting areas until the necessary research is completed.

A respondent said eagle management along the lower elevation areas east of Pelican Butte will eliminate all hiding and thermal cover for deer and elk The Forest may need to consider modifying silvicultural practices for bald eagle management to preserve elk habitat, the respondent said

Indicator Species

Most DEIS respondents who addressed indicator species said the Forest should use different or additional species for analysis. Species suggested include: white-headed woodpecker for old-growth ponderosa pine, black-backed woodpecker and great grey owl for lodgepole pine, blue grouse for the shrub component, yellow warbler or yellow-breasted chat for low boggy mixed-species areas, wood duck for mature deciduous riparian forests, ruffed grouse for mixed or intermediate age riparian areas, sandhill crane for wet meadows, bull trout for high-elevation trout streams, small accipiters for dense second-growth coniferous habitat Other species included wolverine, cougar, and bobcat

Some respondents said one concern about the use of indicator species is that sites designated for protection sometimes are too small to be self-sustaining as intact ecosystems in the long term.

Management Requirements

Some DEIS respondents supported the concept and implementation of management requirements, saying they wanted the requirements made more stringent and comprehensive if true plant and animal diversity is to be preserved on the Forest The northern spotted owl was mentioned as a species needing higher management requirements.

A number of timber industry respondents said that although they believed the management requirements were developed without public participation and were therefore illegal, they supported the management requirement habitat network proposed in the DEIS preferred alternative for spotted owls, pileated and three-toed woodpeckers, goshawks, and martens.

The Coalition for Wise Forest Use said the Forest should look at means other than habitat set-asides for meeting population levels The Northwest Forestry Association said the Forest did not examine the alternative of using management techniques to maintain healthy wildlife populations without taking land entirely out of timber production.

Crater Lake National Park said management requirements do not coincide with the Park Service's management philosophy of maintaining park wildlife populations at 100 percent levels existing at the time of park establishment in 1902.

Dead and Down Material

Many DEIS respondents said they want to see retention levels for snags and downed logs for wildlife increased or maintained These respondents said snags and down logs provide important habitat for nongame species of wildlife, including cavity nesters and small mammals. Some of these respondents cited different levels of snag retention the Forest should use, ranging from 60 percent to 100 percent.

Some respondents said the Forest should also take action to create snags on portions of the Forest that do not contain adequate numbers of snags. Other respondents said it is inexcusable to girdle live

trees just to make wildlife habitat. Some respondents said that within general harvest areas, the Forest should leave adequate green trees to provide snags through the entire rotation

Elk

Most public comment on this species said the Forest should maintain or increase management for elk habitat. Some respondents said a management study should be done on the elk herds, and then a plan should be created for providing habitat and hunting that are compatible with the elk population.

The State of Oregon said elk should be included as a management indicator species. The State said that although no formal (State) objectives are established, management direction is in place under Oregon Department of Fish and Wildlife regulations. The elk habitat effectiveness model, which has greater sensitivity to cover and open road density than the mule deer model, should be used to evaluate elk habitat conditions.

Some respondents noted that the DEIS did not disclose whether or not the Forest intends to manage for elk.

Some respondents wanted to emphasize elk management over deer management One respondent said the plan evidently overvalues mule deer, and the Forest ought to consider reductions in populations of mule deer and domestic livestock and manage for greater elk numbers

Resolution

Standards and guidelines for riparian areas have been developed to meet habitat needs

All potential bald eagle habitat will be managed to provide for long-term eagle habitat needs

Snags will be provided at 40 percent of maximum potential population level in the general forest areas Snag patches and individual snags will be used to achieve that level. Lands with resource objectives other than timber production will generally supply snag levels greater than 40 percent.

Due to the lack of information concerning elk, the Forest will not specifically manage for elk east of Highway 97. Elk habitat west of Highway 97 will be a consideration during project-level planning with an emphasis on the known elk calving areas. As more information is obtained about herd movement and use, the Forest Plan may be amended to provide standards and guidelines for elk management

There will be a cooperative effort with U S Fish and Wildlife Service and Oregon Department of Fish and Wildlife to improve habitat for the shortnosed and Lost River suckers. These suckers were listed as endangered species in 1988.

Firewood Availability and Accessibility

How much firewood should the Winema National Forest make available for local public use? What types of firewood should be emphasized and where should the sources be made available?

Firewood Issue Background

The Klamath Falls Chamber of Commerce has estimated that more than 80 percent of the homes in the city of Klamath Falls and its suburbs use firewood as a primary or secondary heat source It is probable that other communities within Klamath County use firewood in the same or greater proportions A principal source of this firewood is the Forest, which has historically made firewood available to the public either for free or at minimal cost More than 44,000 cords of firewood were removed from the

Forest in 1985. The majority of firewood taken was dead lodgepole pine from the northern and eastern portions of the Forest Although some firewood is available as a free-use product, most is currently available for a small fee to defer administrative costs.

The increased energy costs associated with the energy crisis of the early 1970's encouraged people to take advantage of the relatively low cost of firewood as an alternative heat source. The increase in demand for firewood resulted in the establishment of local businesses that dealt with energy-efficient wood stoves and the supply of commercial firewood.

Within the last five years, the supply of firewood on the Forest has substantially increased because of the large number of lodgepole pine trees killed by the mountain pine beetle. The increased supply has further encouraged its use. The public has become accustomed to readily available sources of low-cost firewood, and prefers the beetle-killed lodgepole pine.

The future of wood burning in the Klamath Falls urban area has been brought into question because of recent local public concern over air quality problems and recent threats of intervention by the U.S. Environmental Protection Agency and Oregon Department of Environmental Quality.

What People said

The Oregon Department of Environmental Quality noted that the DEIS did not discuss the serious air quality and public health consequences of the firewood program The department said the DEIS also did not discuss measures to minimize emissions from wood burning, such as a program to assure that only well-seasoned wood is harvested for firewood In addition, the department said the Forest should show that the Forest Service is not subsidizing the public's use of firewood.

Other DEIS respondents said they needed to be able to cut more firewood. Many suggested allowing firewood cutters more access to lodgepole stands infested with mountain pine beetle.

The Oregon Department of Fish and Wildlife said that as lodgepole pine firewood becomes less available, measures will need to be strengthened to protect dead and down woody material needed for dependent wildlife species The ODFW said firewood gathering must not decrease habitat conditions for nongame species below the 60 percent level

Some respondents said no firewood cutting of down ponderosa pine with the bark still on should be allowed. They said those logs could still be sold to salvage loggers

Citing the importance of snags to wildlife, the Washington Native Plant Society urged the Forest to adopt a forestwide prohibition on the cutting of snags for fuelwood by private or commercial cutters.

Commercial firewood cutters have expressed concern that they will have to compete with private firewood cutters or the timber industry for the dwindling amount of dead lodgepole that is available. Many commercial firewood cutters also stated that a continuing supply of dead lodgepole is needed, because they rely totally or in part on selling firewood for their income

Resolution

The Forest will attempt to meet personal use demand as long as the resource is available

Mountain Pine Beetle Infestation

What should be the Winema National Forest's response to the epidemic mortality in the lodgepole pine tree communities that is being caused by the mountain pine beetle infestation?

Mountain Pine Beetle Issue Background

Lodgepole pine has a commercial value that currently produces a net positive return when harvested. The control of fire has enabled lodgepole pine to grow old and become very weak. This condition has made the lodgepole pine and intermingled high-value ponderosa pine vulnerable to attack by the mountain pine beetle.

Approximately 155,000 acres of mature lodgepole pine on the Forest are in danger of being killed by the mountain pine beetle Projections are that this outbreak of mountain pine beetle will continue to kill the lodgepole pine until most of the large trees are dead, leaving a sparse stand of trees less than 8 inches in diameter Intermingled high-value ponderosa pine trees will also be killed

Government agencies in central Oregon are participating in a cooperative program called "Condition: Red " This program is expected to provide information on how to recognize the insect and its damage and how to manage large areas of lodgepole pine to reduce the risk of infestation Guidelines have been developed to reduce losses from the mountain pine beetle. The Forest is actively participating in the development of new markets for beetle-killed lodgepole pine

What People Said

DEIS comments that addressed this issue ranged from how to manage beetle-infested stands to how to prevent future outbreaks. Some respondents said forestwide standards should incorporate allowances for rapid cutting of stands, because the infestation can only be controlled by a much larger cut of the infested area. Others suggested the introduction of predator species, larvae traps, or spraying to control the infestation.

The Oregon Natural Resources Council said a low risk alternative way of addressing the infestation is letting the outbreak run its course. The council said that because lodgepole pine has no economic value and the beetles do not attack valuable trees, the main risk of leaving the dead trees standing is a major fire. This risk can be reduced through prescribed burning, an activity whose economic and environmental cost is lower than selling and harvesting the timber

Many respondents said the final Forest Plan should accelerate harvest of the insect-infested lodgepole pine stands to salvage as much value as possible before the trees are dead. These respondents frequently mentioned that the material should be used rather than wasted.

Other respondents said the Forest should not accelerate harvest of infested lodgepole pine stands, because those stands provide wildlife protection

The Associated Oregon Loggers said a forestwide priority should be to develop and adhere to a management strategy that attempts to prevent insect and disease problems rather than one that reacts to these problems after they become epidemic. Other respondents said future outbreaks could be controlled through timber stand improvement techniques or by emphasizing ponderosa pine in silvicultural practices.

Other respondents commented on the relationship between beetle-infested stands and potential fire. The Coalition for Wise Forest Use said the effect on the fire regime from delaying harvest in the beetle-infested stands must be thoroughly discussed The coalition said alternatives that would let

significant portions of the affected stands die will have a greater potential for destructive wildfires. Other respondents said insect epidemics should be treated the same way as wildfires. A reserve fund covers costs, and no environmental documentation is done until after the epidemic is controlled and recovery measures have begun

The Klamath Tribe questioned the Forest's estimate of the volume of lodgepole infested with the beetle

Resolution

Harvest and commercial use of dead lodgepole pine infested by the mountain pine beetle will be a priority in the next decade.