

September 9, 2020

Shane Jeffries, Forest Supervisor
Ochoco National Forest
3160 NE 3rd Street Prineville, Oregon

Dear Mr. Jeffries:

These are my comments on the preliminary EA for Forest Plans Amendments for large trees in Eastern Oregon. I'll be brief, focusing on three major concerns: process, policy, and substance.

Process –

This affects 6 National Forests and about 9 million acres, yet the deciding officer is a forest supervisor of a single national forest (Ochoco NF). It seems reasonable and consistent with standard practice that the Regional Forester would be the responsible official when a decision is made encompassing several forests and such a vast area. I found no rationale for this departure and review consequences. At minimum, this delegation should be discussed.

Even though agencies may be afforded greater discretion to utilize an EA for such a proposal, it would make more sense to issue a DEIS, given the large scope, controversy, and anticipated significant impacts. And why dispense with scoping, negating an important step in public involvement and alternative formulation? I saw no *bona fide* alternative that reflected concepts supported by the conservation community, or that would actually strengthen the existing screens. This seems dismissive and short-sighted. At least the comment period has been extended.

I mention carbon here because it is contributory to the deliberative process, and should be an important decision variable. How is it even conceivable that there is no meaningful, substantive analysis of carbon effects – quantitative, qualitative, and economic? It is unquestionably one of the most valued forest resources, and, because you are primarily assessing effects of managing large tree that contribute greatly to carbon reserves, the impact on carbon *must be* evaluated.

Last, noting that the originally *temporary* nature of the screens has languished for decades, why the rush to resolve the issue now? The timing of this proposal in the face of a pandemic, and immediately preceding a Presidential election that may obviate the outcome seems unwise at best, devious at worst.

Policy –

The agency failed to produce a timely comprehensive plan as originally envisioned when the screens were created. Before you dispense with what worked for the past 25 years, please consider that the screens have succeeded at protecting old growth, wildlife habitat, clean water, and led to increasing carbon stores. At a minimum, any proposal should exceed the high bar of improving on the original screens, and not succumb to the temptation to resolve short-term interests.

Substance –

What I have a hard time understanding is why the continued use of commercial thinning, a staple of forest management for the past 20 years (see Fig. 3, p 25), cannot be relied on going forward. I pioneered this concept while Siuslaw NF Supervisor in the 1990s to reduce reliance on harvesting spotted owl habitat. You too can accomplish your stated goals by focusing on thinning small trees and other more socially acceptable and ecologically justifiable activities. The screens provided important sideboards that allowed conservationists and others to come to the table and work to find common ground (e.g. Malheur NF). With big/old tree logging up for renewed debate, conflict and controversy have become heated and - from my perspective - years of good work are being squandered.

I will also note that trust in agency motives and principles is badly eroded; for example, efforts to eliminate all protections for shade tolerant trees (including Douglas fir) under 30"DBH and <150 years old. I know you seek discretion and some capacity for local adjustments, but loose guidelines (as opposed to *firm* standards) provide no assurance for highly skeptical critics from whom you seek acceptance. The same goes for adaptive management approaches that should actually provide meaningful assurances that ecological harm will not be done. Do yourself and the public you serve a favor and replace as much squishy forest management guidance with straight-forward guarantees.

Respectfully,

/s/ Jim Furnish

Jim Furnish

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