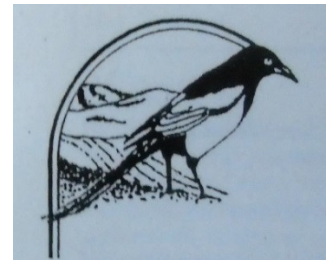




Soda Mountain
Wilderness Council
P.O. Box 512 • Ashland, Oregon 97520



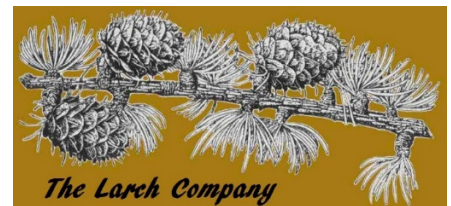
Western
Watersheds
Project



THE HUMANE SOCIETY
OF THE UNITED STATES



THE JOHN MUIR
PROJECT
of
EARTH ISLAND
INSTITUTE



July 7th, 2020

Glenn Casamassa, Regional Forester
United States Forest Service, Pacific Northwest Region
1220 SW 3rd Avenue, Portland, OR 97204

RE: Conservationists Call on USFS to Stop Eastside Screen Revision Process

Mr. Casamassa,

On behalf of our 27 organizations representing millions of supporters across America, we are writing to express our opposition to the Trump administration and US Forest Service decision to revise the environmental rules commonly known as the Eastside Screens. For 25 years, these rules have provided a safety net for old-growth forests, large trees and structure, and wildlife in Eastern Oregon and Washington. They have also made it easier for conservationists, Tribes, local elected officials, logging interests, and the Forest Service to find common ground based on a clear understanding of what is and is not allowed on our public lands.

We strongly urge you to suspend this process. If the Eastside Screens are to be revised, it must happen through a balanced, transparent, comprehensive, socially just, and scientifically sound mechanism that prioritizes wildlife protection, climate resilience, and public consensus over speed and economic exploitation.

A Rushed Process

The Screens have been in place for over 25 years, and have provided a clear “rule book” for forest management in Eastern Oregon.

There is no urgent need to begin a rushed “rapid” assessment and revision of these landmark environmental protections, especially given the coronavirus pandemic and economic and social challenges facing America. The USFS itself seemed to recognize this in an April 3rd memo to Regional Foresters. In that memo (attached), the agency outlined a variety of factors that make public engagement difficult during this unprecedented time. Nearly every factor outlined in that memo applies to this deeply flawed process.

Of particular concern is the ability of the American public, to whom these lands belong, to meaningfully participate and have their voices heard by the Trump administration and USFS. This is particularly true for marginalized people. The decision by the USFS to hold an intergovernmental workshop on the Eastside Screens on a day when tribal governments were closed for an Indigenous holiday was deeply disturbing, and speaks to how flawed this process is.

The USFS has repeatedly denied that this revision process is being driven by political or economic considerations. It has also acknowledged that the outcome will not be durable or credible with the American public if it is seen as such. Further, the April memo stated it would be “appropriate to delay” processes that are for the health of the National Forests so long as economic activity was not the primary driver. The Forest Service can’t have it both ways. If this revision process *is* about political and economic considerations, the agency has acknowledged the final outcome will not be durable or socially acceptable. If it is not, the USFS should follow its own guidance and not undertake this process at this time.

The reality is that since their inception, the Screens have been attacked by industry, politicians and others who desire to return to aggressive logging on public lands. The Forest Service itself benefits financially from logging larger, more lucrative trees and has a record of abusing discretion and ignoring science in carrying out projects targeted at those trees. Given that history, the rushed timeline the Trump administration and USFS are already pursuing calls into question the true goals of this exercise.

Flawed Science

For nearly three decades the Eastside Screens have been successful in protecting Eastern Oregon old-growth forest, large trees and structure, and vital habitat for fish and wildlife. Though it was not their original intent, they have also played an important role in carbon sequestration, protecting soils, water quality, and more.

Under past pressure to weaken the Screens, Regional Forester Linda Goodman said, “science findings ... reinforce the importance of retaining and recruiting large, old trees in the eastside landscape. ... The objective of increasing the number of large trees and LOS [Large and Old Structure] stands on the landscape remains.”

The science whitepaper that the USFS prepared in anticipation of the current Eastside Screens revision process itself describes a number of vital ecological functions provided by large trees that would be degraded should increased logging of them be allowed.

Independent scientists have already raised serious concerns about this flawed process, and have questioned the preliminary assumptions, biases, and conclusions that the Forest Service has presented. Their well-informed concerns and the science they bring cannot simply be brushed aside or dismissed if the Trump administration and the agency intend this process to have any public credibility.

Thus far, it appears that the Forest Service is instead focused on a rushed “rapid” scientific assessment that will underpin future decisions in this process. It is unclear what this rushed process will actually entail, and whether it will meaningfully incorporate all of the current best available science regarding Eastern Oregon forests.

Recent presentations seem to indicate that contrary viewpoints from independent scientists are already being dismissed out of hand. Doing anything less than a full Environmental Impact Statement for a process to revise an important and effective 25-year-old environmental protection affecting millions of acres of public land would be grossly inadequate.

Public Trust

The US Forest Service’s past record of prioritizing economic exploitation of public lands over conservation is well documented, and is the primary reason why the agency has lost the trust of much of the American public. This fact was acknowledged by USFS staff during recent workshops regarding revising the Eastside Screens. Those workshops clearly showed this broad-scope, complex, consequential, and controversial process is deeply polarizing. It has further strained already struggling collaborative groups, and pushed the concerns of Native Americans, independent scientists, and other stakeholders aside. The administration and agency seem hell-bent on meeting an artificial timeline to satisfy political and economic goals.

When the Eastside Screens were put into place in the 1990’s, many biologists called for even stronger protections for large trees and structure, roadless areas, and riparian habitat. The Screens fell short of that comprehensive protection, as they were intended as an interim measure until more comprehensive protections took their place. The Forest Service failed to adopt stronger comprehensive protections. Now, 25 years later, rushing to revise the Screens without a comprehensive process that includes stronger protections for wildlife, clean water, and the climate is a gross violation of the public trust.

The Forest Service has claimed this process is aimed at expanding ecological restoration activities. That goal can be achieved through the flexibility that already exists under the Eastside Screens. Legitimate environmental restoration does not require greatly expanded commercial logging of large and old trees. The Screens have worked for nearly three decades and grant the agency ample discretion to accomplish ecological and economic goals by focusing on thinning smaller, younger trees and through the use of prescribed fire.

Conclusion

Our organizations support the restoration and protection of forests, wildlife, and wild rivers on America’s public lands. We also seek positive economic and social outcomes for our communities. We believe our public lands, and the forests, fish, and wildlife they contain, are a national treasure that should be managed as a legacy for future generations, not exploited for short-term profit or political gain.

For 25 years, the Eastside Screens have provided Oregon with a rulebook that has allowed greater public consensus to emerge around legitimate forest restoration activities. The Screens have created better environmental conditions in our forests, increased collaboration among communities, garnered greater public support for the Forest Service, and supported more sustainable economic opportunities for rural communities. They must not be weakened or discarded to satisfy political or economic agendas.

The Trump administration and US Forest Service must suspend the rushed, ill-timed, and deeply flawed process to revise the Eastside Screens.

From holding key meetings on Indigenous holidays to ignoring scientific dissent, serious questions have already arisen over its true goals. We believe that any change in the rules that govern the management of public lands in Eastern Oregon should be done through a balanced, transparent, comprehensive, and scientifically sound process that prioritizes wildlife protection, climate resilience, and public consensus over speed and economic exploitation.

Any revision that comes out of a biased analysis that takes place during a global crisis will not be durable.

Sincerely,



Sean Stevens
Executive Director
Oregon Wild



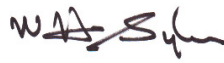
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Wally Sykes
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Director & Principal Ecologist
John Muir Project



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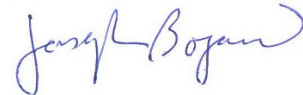


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Tom Montoya, Wallowa Whitman National Forest Supervisor
Eric Watrud, Umatilla National Forest Supervisor
Shane Jeffries, Ochoco National Forest Supervisor
Craig Trulock, Malheur National Forest Supervisor
Holly Jewkes, Deschutes National Forest Supervisor
Barbara Drake, Fremont-Winema National Forest Supervisor

Enclosure:
COVID-19 Pandemic New Comment or Objection Filing Period Guidance - memo to Regional Foresters