

August 12, 2020

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

RE: Eastside Screen Amendment Process

Mr. Casamassa,

On behalf of our five organizations, we are writing to request your agency adjust course on the review of the Eastside Screens Amendment. Specifically, we urge you to:

- Analyze the alternatives in an Environmental Impact Statement;
- Provide at least 90 days for a public comment period with additional public workshops to help people work through the material; and
- As described below, confirm and commit to utilizing the 1978 Council on Environmental Quality National Environmental Policy Act regulations to complete the environmental analysis for the proposed amendment.

The Eastside Screens have been in place for over twenty years and cover over 9 million acres in Oregon that include diverse landscapes and habitat types. However things proceed, the Forest Service's review process will culminate in a consequential decision that is important to a wide variety of stakeholders locally and nationally. The Forest Service has a legal, ethical, and practical duty to provide a robust public engagement process. There is a great deal of information for the public to consider and address. Our organizations want the public to have sufficient time to provide constructive feedback that can help lead to a more durable, socially acceptable, and ecologically appropriate outcome.

For a decision of this magnitude, an EIS, with a clear-eyed look at a full range of alternatives, is the appropriate level of review. The issues are complex, and there are numerous competing ideas about ways to approach them. Regardless of the alternative selected, there will be a significant impact on the environment. An EIS and a full range of alternatives will allow the public and the decision maker to better weigh the tradeoffs associated with different approaches.

Analysis under the 1978 CEQ regulations is appropriate because the 1978 regulations were in effect when the agency commenced the amendment process. *See*, 40 C.F.R. 1506.13 (2020). Further, the new regulations are already the subject of three lawsuits, and may well be rescinded or modified. There is no need to add additional uncertainty to the amendment process by utilizing regulations that are of dubious legal validity. Committing to the regulations that were in place when this process began would be an appropriate gesture of good faith.

Due to the continuing global pandemic and other significant issues, providing quality comment on such complex and material will be difficult for many stakeholders. An EIS with a 90-day comment period and additional public workshops would be an appropriate way to help mitigate some of these circumstances.

Thank you for seriously considering this request. We look forward to your response.

Very Sincerely,

Doug Heiken
Conservation & Restoration Coordinator
Oregon Wild

Susan Jane Brown
Staff Attorney
Western Environmental Law Center

Veronica Warnock
Conservation Director
Greater Hells Canyon Council

Mathieu Federspiel
Juniper Group Sierra Club

Ben Gordon
Executive Director
Central Oregon Landwatch

CC:

Senator Ron Wyden

Senator Jeff Merkley

Representative Greg Walden

Emily Platt, District Ranger, USFS

Chris French, Deputy Chief, USFS

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Barbara Drake, Fremont-Winema National Forest Supervisor

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Eric Watrud, Umatilla National Forest Supervisor