October 10, 2020

Attn: Shane Jeffries

Forest Supervisor and Responsible Official

Ochoco National Forest

3160 NE Third Street

Prineville, OR 97754

*Submitted electronically via CARA to: https://cara.ecosystem-management.org/Public/*

*CommentInput?project=58050*

**RE: The Oregon Chapter of Backcountry Hunters and Anglers Comments on the Proposed Eastside Screens Plan Amendment in Oregon**

Please accept and fully consider these comments on behalf of the Oregon Chapter of Backcountry Hunters & Anglers on the proposed “Forest Management Direction for Large Diameter Trees in Eastern Oregon #58050” (Eastside Screens Plan Amendment) and associated preliminary Environmental Assessment (EA). Founded in 2004 around an Oregon campfire, Backcountry Hunters and Anglers has grown to lead the nation as the public lands advocacy organization for sportsmen and women. We represent hunters, anglers and public lands enthusiasts from all fifty states including close to 2,000 members in Oregon who care deeply about the management of our public lands. We appreciate this opportunity to comment as our members have a significant recreational interest in eastern Oregon’s national forest lands.

**Need for an Environmental Impact Statement**

The preparation of an Environmental Assessment is inadequate for meeting the Forest Service’s obligations under the National Environmental Policy Act (42 USC 4321 et seq.). This should be corrected through the preparation of an Environmental Impact Statement (EIS). In determining whether to prepare an EIS, the agency’s NEPA Handbook directs the Responsible Official to “consider the significance of effects” of the proposed action (FSH 1909.15 21.1). When evaluating the scope of this Plan Amendment it is clear that an EIS is the appropriate level of NEPA analysis for the proposed Eastside Screens Plan Amendment.

The Forest Service’s proposal would amend the forest plans for six national forests in eastern

Oregon: the Deschutes, Fremont-Winema, Malheur, Ochoco, Umatilla, and Wallowa-Whitman. This is a very large area, including a substantial amount of federally-managed land, stretching

from south central Oregon to northeastern Oregon. This landscape also encompasses many of Oregon’s most sought-after big game hunting units. It supports numerous species of conservation concern including species of wildlife, plants, and invertebrates and provides recreational, economic, and quality of life values to all users. Given the ecological differences across these forests, it is not possible to determine through a single EA that no significant impact would occur from the proposed programmatic amendment of these six forest plans. Instead, an EIS is better suited to a proposal of this scale.

**Conclusion**

The adoption of the Eastside Screens was the product of combative debates over management of the Northwest Forests during the early 1990s. The current proposal to amend the 21-inch rule of the Eastside Screens is also controversial with a multitude of public land users and stakeholders already providing input to the Forest Service. The EIS process will provide for a greater level of public participation to stakeholders with public comment opportunities during which concerns can be voiced and addressed, more so than during a singular 30-day comment period offered by the EA. Preparation of an EIS will offer our members and supporters the appropriate public engagement opportunity for this action and also provide the proper level of transparency by the Forest Service.

Thank you for the opportunity to comment and we look forward to continuing our engagement on this important planning effort. If you have any questions about these comments, please feel free to contact Nic Callero at ncallero@gmail.com