



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Bend Field Office
63095 Deschutes Market Road
Bend, Oregon 97701



In Reply Refer to: 01EOFW00-2021-CPA-0002
FWS/R1

October 13, 2020

Shane Jeffries, Forest Supervisor
Ochoco National Forest
3160 NE 3rd Street
Prineville, Oregon 97754

Subject: US Fish and Wildlife Service Comment – Forest Plans Amendment, Forest Management Direction for Large Diameter Trees in Eastern Oregon

Dear Mr. Jeffries:

Thank you for the opportunity to review the preliminary Environmental Assessment (EA) for the Forest Plans Amendment, Forest Management Direction for Large Diameter Trees in Eastern Oregon. The subject of managing mature and old forests and trees is an important one for a broad range of values and services associated with these forested habitats. Generally, the US Fish and Wildlife Service (Service) focuses on trust resources such as those associated with the Endangered Species Act, Migratory Bird Treaty Act, Bald and Golden Eagle Protection Act, and other legislation for which the Service has management authority or responsibility. We have received a draft Biological Assessment for this effort, and will be consulting/conferencing in compliance with Section 7 of the Endangered Species Act as you proceed in finalizing this project.

The Service offers the following for consideration from the EA. In regard to adaptive management that is part of the Proposed Action and Adaptive Management Alternatives, the EA states that if restoration treatments prove ineffective at conserving old trees then a moratorium on cutting large trees would be re-imposed. The EA goes on to say that the analysis that would determine the effectiveness of restoration treatments would be conducted every five years. This approach can be effective and allow for adjusting management to incorporate the best available data and science rather than being locked into a narrow range of management options. However, without further developing indicators and thresholds for success, agreed to by stakeholders, there is potential for disagreement as to whether treatments were successful or not. The EA states that effectiveness monitoring would focus on various aspects of large tree mortality rates. The Service recommends considering some effectiveness or validation monitoring of wildlife

INTERIOR REGION 9
COLUMBIA-PACIFIC NORTHWEST

IDAHO, MONTANA*, OREGON*, WASHINGTON

*PARTIAL

species' response to management. If this type of monitoring is pursued, it may require a longer-term commitment that may not fit into a five-year schedule.

As you move toward completion of this EA, please feel free to contact Mark Penninger (mark_penninger@fws.gov) in the La Grande Field Office or Emily Weidner (emily_weidner@fws.gov) in the Bend Field Office with any questions regarding local or trust resources that we may be of assistance with.

Sincerely,

Bridget Moran
Field Supervisor

Cc:

Marisa Myer, US Fish and Wildlife Service, La Grande Field Office
Jennifer O'Reilly, US Fish and Wildlife Service, Bend Field Office