OREGON SOCIETY OF AMERICAN FORESTERS

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Shane Jeffries, Forest Supervisor
Ochoco National Forest
3160 NE 3rd Street Prineville, OR 97754
Sent via email: SM.FS.EScreens21@usda.gov

Dear Mr. Jefferies,

The Oregon Society of American Foresters (OSAF) is providing official comments on the management alternatives outline in the Preliminary Environmental Assessment (EA) on the Forest Management Direction for Large Trees in Eastern Oregon amending the 21-inch Diameter limit associated with the Eastside Screens that were put in place in 1994-95. The Forest Service states that the decision to be made needs to be durable from an ecological, economic and social perspective. **OSAF stresses that it needs to be physiologically durable, too.** There are significant declines in large trees, not associated with timber harvests occurring in these forests due to excessive competition, low vigor, and subsequent increasing mortality of large/old trees. If treatments are not physiologically durable, ecological, economic and social durability won't matter.

As stated in the EA:

- The goal of this proposed amendment is synonymous with the purpose and need for the original screens, which is the "…need to maintain the abundance and distribution of old forest structure." The original 1994 EA explains, "The purpose is to preserve those components of the landscape -- old forest abundance, wildlife habitat in late and old structural stages, and riparian areas -- which new information suggests is vitally important to certain species of wildlife and fish and to the overall vegetative structure of the forest." **OSAF supports this goal.**
- Given new science and our evolving understanding of landscape ecology, a standard that prohibits logging of all trees larger than or equal to 21 inches diameter at breast height (dbh) is no longer adequate to support landscape restoration and resiliency efforts, nor conserve the remnant old and late seral and/or structural live trees it was meant to protect. **OSAF agrees with this statement.**

OSAF previously provided comments to Shane Jeffries in July prior to the development of these alternatives. We've attached our comments again as a reference to our current comments on the various alternatives discussed below.

2.4 ADAPTIVE MANAGEMENT ALTERNATIVE (OSAF Preferred Alternative)

The OSAF supports this alternative and believe it provides the most flexibility for managers to adjust prescriptions given plant association group (PAG) stand structure and composition, and landscape pattern and conditions. Driven by ecological reasons, site capacity, current stand conditions – and by management objectives— this alternative provides the most ecological and physiologically sound approach. Thus, removal of any 21-inch trees will be occasional and will occur when it supports the desired ecological objectives. The Forest Service has conducted a lot of landscape analyses over the 25 years since these Forest Plans were put in place. There has also been considerable research conducted on the management of these forests. Between the knowledge and experience gained through research and practice, we are convinced that the Forest Service

professionals are capable of developing prescriptions that move stands/landscapes in the desired ecological trajectory to meet the Forest Plan goals. The adaptive management component of this alternative will add some certainty that prescriptions will be modified to assure goals are met across the landscape, especially if metrics are established for projects that are easily monitored.

We understand that this alternative is probably least favored by environmental organizations because there is no strict diameter or age limit and thus, they may believe there will be no oversight of the Forest Service on management treatments going forward. They will cast this as a trust issue (see discussion below on trust). However, OSAF believes there will be plenty of oversight with Collaboratives, stakeholders, and other groups watching over, weighing in, and working with the Forest Service on restoration and forest management projects (see comments below related to trust). Forest Service projects are not done in a vacuum and interested parties have adequate opportunity to participate in the planning and monitoring of projects.

Furthermore, the EA analysis shows that this alternative ranks the highest in providing the benefits of forest product resources; jobs and income opportunities; forage, botany and range opportunities; cultural and heritage resources; wildlife and wildlife-based recreation; and aquatic resources. Important in meeting these mixed objectives, this alternative will provide an improved mixed of commercial forest products needed by area mills, the value of which will help pay for restoration projects. Funding has been and continues to be a major obstacle in increasing the pace and scale of forest restoration. We expect that trees marked for cutting, no matter their diameter, and the harvested timber volume will be an outcome, **not the driving force**, of restoration objectives that move the landscape to larger/older forest conditions.

2.1 CURRENT MANAGEMENT ALTERNATIVE

OSAF strongly opposes this alternative because, unfortunately, it's gotten us to where we are now. Old trees continue to die at a high rate and there will be no relief of this fact if the current management alternative remains in effect. Since this alternative codifies the 21-inch limit as a standard, there is no flexibility to adjust prescriptions as stand and landscape conditions might warrant. From a scientific and ecological perspective, we know that forests are dynamics, and this fixed standard prevents managers from being able to adjust and do the right thing as conditions present themselves. And this will be more important going forward under a warming climate. As we've seen, this management alternative does not meet the economic objectives because projects are artificially constrained to harvesting only small trees, which often don't pay their way out of the woods driving up treatment costs and preventing complete restoration or constraining additional acres that potentially could be treated. This constraint creates a greater burden to taxpayers than need be. As stated before, OSAF is not advocating that trees over 21 inches should be targeted for cutting for economic reasons solely; removal of any 21-inch plus tree should be driven more by ecological and landscape objectives.

2.2 OLD TREE AND LARGE TREE GUIDELINE WITH ADAPTIVE MANAGEMENT (PROPOSED ACTION)

OSAF does not support this alternative. This alternative defines old trees as ≥ 150 years of age. The age here is arbitrary and we are at a loss as where this limit comes from. Historic ponderosa pine stands, for example, were **multi-aged**, with trees ages comprised of juvenile (0-50 yrs.), young (50-150 yrs.), middle-aged (150 to 300 yrs.), old (300-450), and very old (450+ yrs.) trees. For ponderosa pine, Douglas-fir, and western larch, 150 years of age is hardly old because they are long-lived species. Humans might consider 150 years to be old because we often view something as "old" if it's older than the typical human lifespan. Thus, the age limit should not be considered in context of human lifespans, but rather the lifespan of the tree species in question. If this age limit was chosen because it approximates Euro-American settlement, we argue that the age limit would need to increase to 170-200 years of age. By 1850 Oregon was well-settled and with most Native American populations placed on reservations by 1855, and, in addition, due to population declines due to disease, they no longer fired the landscape as they had for millennia thus allowing our forests to change forever. Native Americans had been

a powerful and frequent force of laying fire down in our ecosystems, both in eastern and western Oregon affecting their growth, development and landscape pattern.

For this management alternative, large trees are defined as grand fir, white fir, or Douglas-fir ≥ 30" dbh or trees of any other species ≥ 21 inches dbh. The increase to 30" for fir species adds some flexibility (compared to the current management alternative) in mixed-conifer plant associations. However, the 21-inch limit for other species (ponderosa pine and western larch) reduces flexibility and severely constrains managers in doing restoration treatments; as stands get more dense, large trees, and trees that you want to get large for replacement will continue to die or succumb to mortality prematurely. A huge portion of the central and eastern Oregon federal forests landscape was thinned in the 1980s and 1990s and will need to be thinned again to keep them healthy and advancing in size/age. This will continue to hamper removal of some trees over 21-inches for health, disease or other issues, while still provide an abundance of trees to keep growing that are near, at, or above 21 inches.

We like the fact that under this alternative it is now a guideline rather than a standard. This provides a little more flexibility (but only a little). We believe, however, that there will be so much scrutiny that it will ends up being a de facto standard, still making it difficult to get things done on the ground.

Under the "new guideline section" it states in the last sentence: *"Management activities should consider species composition and spatial arrangement within stands and across the landscape …"* We believe that this statement should be modified to include stand density and the historic diameter distribution, such that it would read: *"Management activities should consider species composition,* ***stand density, historic diameter distributions,*** *and spatial arrangements within stands and across the landscape…"*

There is a sentence in this alternative that confuses us. It states, *"If restoration treatments prove ineffective at conserving old trees relative to passive management of unmanaged stands, a dbh limit will be re-imposed. The dbh limit that would be imposed would prohibit harvest of grand fir, white fir and Douglas-fir trees ≥ 30 inches and prohibit the harvest of all other tree species ≥ 21 inches."* First, how do you determine whether something is ineffective for conserving old trees? One way would be if you treat a stand and large trees continue to die one might conclude the treatment was ineffective and therefore the 21-inch limit would be imposed. However, the treatment may have been benign or somewhat effective at reducing stress, but the trees may have lost so much vigor and/or additional drought or moisture stress is the underlying cause. Also, what you mean by "passive management?" Is this synonymous with no management?

Further down in that paragraph it states: "*This standard is not suggested specifically by the scientific literature but rather is a recognition of trust issues deeply embedded in management activities involving old trees in the Northwest."* Although we understand where this is coming from, trust is a two-way street. To address trust, we think the EA gets it right on page 9: " *In response to concerns related to trust, collaboration, monitoring, and adaptive management, the alternatives integrate an adaptive management component to ensure accountability through targeted monitoring of impacts to large and old trees. The alternatives also encourage the use of multi-party monitoring to support a meaningful way for citizens to be involved in the monitoring*." Over the past 25 years, the Forest Service has demonstrated transparency and shown to be trustworthy. That is, they have done or followed through with what they have said they would do. However, some groups use "not trustworthy" as a trump card to give them ability to walk away, stop, or curtail discussions or other methods of doing things without having to be responsible for those actions and thus providing a conscious-clear avenue to pursue litigation. Often groups may say, "We might be supportive of this idea, but we just don't trust you to do it," which ends all discussions and puts a kibosh on new ideas and approaches. Although groups profess to rely on science, some have their hands cupped over their ears to prevent hearing and therefor denying the science

(physiological science) that has emerged pointing to the fact that that big/old trees are in trouble, stressed, and subject to increased mortality; it will only get worse as climate change manifests itself. Stand density and composition need to be reduced to buffer those trees going into this uncertain future in an effort to increase their longevity, habitat, genetic, and social value.

2.3 OLD TREE STANDARD ALTERNATIVE

OSAF does not support this alternative whatsoever as 150 years is an arbitrary age. Where does this age limit come from? Euro-American settlement was pretty much complete by 1850 (and earlier in the Willamette Valley, see above); thus, if this is based on settlement date, it should be at least 170 years. Alternatively, is this age limit is being driven by the fact that some people view 150 years as old, because they view 150 years as old compared to their own or the typical human lifespan? However, ponderosa pine lives to ~600 years (and some to 800 yrs.), thus, 150 years would not be considered "old" for ponderosa pine. In contrast, aspen or lodgepole pine, which are relatively short-lived, 100 years would be considered very old or old, respectively. As stated previously, even historic forests were uneven-aged containing juvenile, young, middle-aged, old, and very old trees. From a practical point of view, determining trees of 150 years of age or older is not easy. Although there are some morphological guides to assist forest managers, these are far from perfect/precise. Because of this, OSAF is concerned that it would be very difficult to implement this alternative as nearly every tree could be contested by some individual or interest group. Lastly, this alternative provides little room to manage stand density, particularly when middle-aged to older even-aged stands (see our attached document; comments from July 10th letter) that are at this age limit continue to increase in density. As these stands increase beyond the carrying capacity of the site, tree vigor declines and we will see accelerated mortality of the very old trees you are trying to retain. This alternative is not physiologically durable in the long run.

2.5 ALTERNATIVES CONSIDERED BUT NOT FULLY ANALYZED

OSAF does not support any of these ideas. The lower diameter limit would be not achieve the purpose and need for this amendment (see OSAF attached comments) and it is unclear to us how the idea of "basal area-weighted age of stands" would work from either an ecological or practical standpoint. We oppose the idea of "all trees over 21 inches that are cut would remain on site" and having a "combined age and diameter limit standard."

Thank you for allowing OSAF to comment on these alternatives. We believe it is time to develop an alternative provides flexibility, follows current and emerging science, and assists land managers in moving stands and landscapes in the desired direction as outline in the EA. Forests are dynamic and our management should be as well.

Sincerely,

Jeff Grogan

Jeff Grogan, Chair
Oregon Society of American Foresters