Data Submitted (UTC 11): 10/13/2020 2:41:38 PM
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Comments: Comments on the Proposed Action and Alternatives in the US Forest Service Pacific Northwest Region's Forest Plans Amendment: Management Direction for Large Diameter Trees in Eastern Oregon Environmental Assessment-preliminary, August 2020.

NOTE: Also sent by email

By: Jerry Franklin and Norm Johnson
Date: October 7, 2020

We recognize the changes proposed in the Environmental Assessment (EA) are intended to assist in conservation and growth of late and old structural (LOS) stages in the dry forests east of the Cascade Range in Oregon. This includes the Ochoco, Malheur, Umatilla, and Wallowa-Whitman National Forests and all areas of the Deschutes and Fremont-Winema National Forests outside of the Northwest Forest Plan.

The action alternatives in the draft EA only amend the 21" rule component of the Wildlife Screen. The 21" rule only applies outside of LOS stands. Like the other sections of the Screens, all timber sale activities must be planned so that they maintain and/or enhance LOS components. More broadly, the EA is intended to respond to planning rule direction for management to restore and maintain the integrity of these forest ecosystems.

Overall, we support the effort to decrease the barriers to restoration of dry forests (e.g., dry pine and mixed conifer forest types that were historically dominated by frequent fire) in eastern Oregon by removing shade-tolerant conifer species that have encroached and young conifer stems that have increased since fire suppression. The science is clear that old trees (>150 years) are the backbone of these ecosystems, and young (<150 years), large trees that have grown over 21" dbh since fire suppression have put the old trees at risk. Efforts are underway across eastern Oregon to restore dry forest systems and prepare them for continued climate disruptions such as extreme or prolonged drought and fire events. Updating the wildlife screens to allow the harvest of young, large trees that are threatening old trees and disrupting ecosystem processes and functions would support these important efforts.

However, we have concerns with the proposed action (Old Tree and Large Tree Guideline with Adaptive Management) and with the assumptions, analysis, modeling, and interpretation in the draft EA. We also believe that the EA and the analyses that underpin it fail to consider current scientific knowledge about the unique roles played by old trees in dry forest ecosystems.

To address these concerns, we have the following four requests:

1)That you address the significant problems with the assumptions, analysis, modeling, and interpretation utilized in the EA relative to achieving the stated goals, including incorporation of scientific information on the unique role of old trees in dry forest ecosystems. This is especially important since some alternatives within the EA propose significant reductions in existing old tree populations. While the EA is limited by being framed within the ecosystem standards and retaining the dated definition of LOS, we believe the EA needs to:

A)Explicitly recognize the unique ecological nature and roles of old trees in the dry forests in live, standing dead, and down forms and differentiate them from young large trees;
B)Provide clear and adequate requirements for sustaining old tree populations in both their live and dead forms

in the dry (e.g., frequent fire) forests;
C)Correctly analyze the ecological outcomes of the alternative as they offer varying limitations on harvest of either old or large trees; and
D)Clarify that age should have always been understood as a characteristic of LOS (late and old structure), which includes additional morphological characteristics besides dbh.

We describe the scientific basis for these needed improvements in the attached open review of the EA.

2)That you adopt the alternative called the "Old Tree Standard" Alternative or an equivalent alternative that requires all old trees (defined as trees estimated to be over 150 years of age) be kept.

3)That any new policy or guidelines go beyond simply retaining all old trees and also direct that restorative treatments be undertaken to facilitate continued survival of the trees. Retention is needed but, by itself, is insufficient. Such treatments should include the removal of fuels and competing vegetation around the retained old trees in order to allow them to live out their normal life span. Retaining older trees that remain surrounded by unnatural accumulations of heavy fuels and competing younger trees, which also provide fuel ladders that carry fire into the old tree canopies, does not do enough to increase old tree survival. Toward that end, large young trees should not be retained that directly threaten old trees either as competitors for moisture and other resources or as potential fire ladders.

4)That management to provide replacement old trees should be a part of the management plan, with a view to restoring historical (pre-fire suppression) population levels of old trees.