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First name: Blake

Last name: Henning

Organization: Rocky Mountain Elk Foundation

Title: Chief Conservation Officer

Comments: The Rocky Mountain Elk Foundation appreciates the opportunity to provide the attached comments regarding Forest Management Direction for Large Diameter Trees in Eastern Oregon #58050.

Dear Mr. Jeffries:

RMEF's mission is to ensure the future of elk, other wildlife, their habitat, and our hunting heritage. We represent nearly 235,000 members nationwide and over 17,000 members in Oregon. Since its inception in 1984, RMEF has permanently protected or enhanced more than 7.9 million acres of North America's most vital habitat for elk and other wildlife, including over 830,000 acres in Oregon.

RMEF appreciates the opportunity to comment on the Preliminary Environmental Assessment (EA) for amending relevant Forest Plans to include forest management direction for large diameter trees in eastern Oregon. RMEF commends the U.S. Forest Service (Service) for amending an outdated rule, which was originally adopted as [ldquo]temporary[rdquo] and for over 25 years has shown to be ineffective in reaching desired forest conditions. As stated in the EA, a variety of empirical studies and science syntheses demonstrate that protection of all trees greater than 21 inches diameter at breast height (dbh) prevents restoration of historical conditions and conditions that are likely to maintain old trees into the future. RMEF appreciates the Service's thorough review and analysis of scientific documents used to inform the EA (186 individual documents cited). We agree that new science does not support a Forest Plan Standard that prohibits logging of all trees larger than or equal to 21 inches dbh, and is no longer adequate to support landscape restoration and resiliency efforts. With the recent publication of the Service report The 1994 Eastside Screens large-tree harvest limit: review of science relevant to forest planning 25 years later (PNW-GTR-990), RMEF suggests review and incorporation of relevant findings into the EA.

RMEF supports the effort to amend the Forest Plans, but disagrees with the Service's preferred alternative (Old Tree and Large Tree Guideline Alternative), which identifies specific tree diameters and ages to avoid during project implementation. Imposing such Guidelines would replicate the 1994 action when the 21-inch rule was initially adopted, and is not a durable approach to meeting the Purpose and Need or Goals of the Plans. In addition, the EA states that the specific tree diameters and ages suggested in this alternative are [lsquo][hellip]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.[rsquo] As stated in the Purpose and Need, RMEF encourages selection of a science-based alternative to the 21-inch standard in the Eastside Screens.

RMEF supports the Adaptive Management Alternative. Not only is it supported by the science-based analysis, it confers the greatest flexibility to managers to shift species composition based on site conditions or desired future conditions. Managers would have ability to develop diverse post-treatment plans, because there would be no constraints on size or age of trees for removal. The Adaptive Management Alternative:

? Allows land managers to use the best available science to implement the most effective forest health treatments;

? Increases opportunities for proactive forest management, timber harvest, and public access; and

? Ensures some stability for the region's forest infrastructure and increases capacity for forest management.

Using a science-based approach, the EA also ranked all alternatives based on the relative effects of each alternative to key benefits. These include benefit to people; forest products resources; jobs and income opportunities; forage, botany, and range opportunities; cultural and heritage resources; wildlife and wildlife-based recreation; and aquatic resources. The Adaptive Management Alternative ranked out as the top alternative across each of the benefit types.

A majority of conclusions within the EA support selection of the Adaptive Management Alternative; RMEF recommends this as the preferred action. Given the lack of support for the preferred alternative in the EA, RMEF requests further evaluation/justification for selection of the Old Tree and Large Tree Guideline Alternative.

Finally, RMEF recommends clarification about the inclusion of Washington in the proposed EA, as the Umatilla National Forest occupies space in both Oregon and Washington.

RMEF appreciates the opportunity to participate in proposed Forest Plan amendments that will update direction on large diameter tree treatments in eastern Oregon.

Sincerely,