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Shane Jeffries, Forest Supervisor Via email: SM.FS.EScreens21@usda.gov

Ochoco National Forest

3160 NE Third Street

Prineville, OR 97754

Dear Mr. Jeffries,

The Oregon Cattlemen's Association (OCA) appreciates the opportunity to submit comments with respect to proposed changes to the 21" rule of the Eastside Screens.

OCA supports the preferred alternative outlined in the draft environmental assessment, "Forest Plans Amendment Forest Management Direction for Large Diameter Trees in Eastern Oregon."

The Association agrees with the assessment's "Proposed Action" to replace the 21-inch standard with a guideline that emphasizes recruitment of old trees and large trees, defining old trees as [ge] 150 years of age. Large trees are defined as grand fir, white fir, or Douglas-fir [ge] 30" dbh or trees of any other species [ge] 21 inches dbh.

Furthermore, OCA supports the Environmental Assessment's proposed hybrid alternative with adaptive management, however there is concern about the likelihood of getting this accomplished since it is dependent upon trust in Forest Service managers. This approach is contingent upon good multiparty monitoring to test the latitude given to managers and could be a trigger for stronger standards if Forest Service management fails to advance the desired end result.

We believe the history of multi-party monitoring is varied; strong where CFLRP funding is in place, or some other well-funded partner, and weak when relying on collaborative volunteers. We respectfully recommend the Forest Service ensure multiparty monitoring is both rigorous and well-funded.

The 30" standard for grand fir, white fir and Douglas fir simplifies the standard, rather than having to generate assessment of actual age. Undoubtedly it gives more latitude for better management decisions now, but if we fail to move forward with this standard, the forest will continue to mature, and we will be faced with 30" as an additional constraint.

We agree with the analysis supporting the need to remove large but young fire intolerant species to create resilient forest conditions and reduce the risk of stand replacing wildfires. Oregon's Cattle Producers rely heavily on access to the National Forest. The Forest is accessed for recreation as well as for food and wood gathering,

hunting, fishing, livestock grazing and timber harvest. It is important the forest remains safe for all uses.

Oregon's forests provide jobs as well as respite for people from all over the world. It is imperative that our forests are healthy - resilient to insect, disease and wildfire, with open meadows for wildlife and livestock, and that there is ample water for fish, forest functionality as well as residential and farm use. Page Two October 13, 2020

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Catastrophic fires displace residents living in the wildland urban interface; destroy private property; threaten public safety; consume valuable timber and grasslands vital for the local economy as well as habitat and forage; and invite the spread of invasive and noxious weeds. For these reasons we urge more aggressive treatments, including taking fir trees over 30" dbh, in the national forest.

To preserve the high standard of living OCA supports policies that advance ample forage for livestock, and timber for fiber to support our rural economies. The 21" rule has not only put forest health at risk but hampered the economy. Since the roll out of the "temporary" rule our forests have grown relatively unchecked and timber harvest is a fraction of what it was in the early 1990s. Since then much of our forests have become overgrown, blocking out sunshine for the shrubs on which elk, deer and livestock rely.

OCA agrees with the EA where it identifies a need to adapt stands to future climate and disturbance regimes by significantly reducing stand competition, shifting species composition to fire and drought tolerant species, and conserving old, fire-tolerant tree species (pp. 7-8). We are already seeing trends since the 1980s of hotter and drier summers causing longer wildfire seasons. By allowing our District Foresters to remove more of the bigger trees, some that are decadent or in decline, more moisture would be utilized by the trees left behind, leaving a forest stand in better shape to withstand impending temperature and moisture changes for the next 50 to 100 years.

Qualitatively, more open stands dominated by old, fire tolerant, shade intolerant species are better able to withstand likely future climate and disturbance regimes. The EA should contain this discussion and analysis.

With reference to the cumulative effects analysis, the EA should include a discussion of how many forest plan amendments have been authorized to remove trees larger than 21" and what has been the environmental consequences of those actions in combination with the proposed action. Our producers are familiar with the economic benefits of cutting larger trees and understand the need to balance this with what is best for the ecology.

Oregon Cattlemen's Association urges Region 6 adopt the proposed action and increase local District Forester's ability to plan landscape scale projects that promote forest health and prepare our national forests for future generations.

Respectfully submitted,

Tammy L. Dennee, CMP, CAE - Executive Director

OREGON CATTLEMEN'S ASSOCIATION

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