

Data Submitted (UTC 11): 10/13/2020 7:00:00 AM

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Comments: Dear Mr. Jeffries:

As indicated by our scoping comments, the Blue Mountains Forest Partners (BMFP) is supportive of changes to the 21-inch rule that comport with the best available science and recent research on old-growth conservation and forest resilience. While we support the intent of the preferred alternative, our preference is for the Old Tree Standard alternative. In our view, the preferred alternative may effectively achieve the goal of conserving and propagating old-growth trees, but as a Guideline, this alternative provides the Forest Service with substantial discretion and flexibility that may not be warranted or acceptable to many stakeholders. On the other hand, the Old Tree Standard alternative is very clear and easy to implement in the field by the agency, contractors, and stakeholders. BMFP has experience designing and implementing the core principles of the Old Tree Standard: our Upland Zones of Agreement ( available at <https://www.bluemountainsforestpartners.org/work/zones-of-agreement/>) state that "Absent a site-specific analysis that indicates logging older trees is necessary to achieve resilience objectives, trees that were established prior to extensive Euro-American interventions on the landscape beginning in the 1860s should be protected. Adopting a younger age threshold may be necessary to ensure recruitment of old growth trees when there are few or no older trees present in stands."

Although we support the intent of the amendment, BMFP is disappointed in the ability of the Preliminary Environmental Assessment (EA) to make a clear and persuasive case for the proposed amendment. For more than a decade, BMFP has devoted enormous organizational resources-including thousands of hours of volunteer time and funded, peer-reviewed scientific research-to active restoration of federal forests in the Blue Mountains. The success of our efforts relies entirely on Forest Service NEPA planning.

BMFP works closely with the Forest Service to develop projects that remove young trees >21" as necessary to accomplish restoration objectives, which has been accomplished via project-level forest plan amendments. BMFP has long advocated for a comprehensive Malheur National Forest forest-wide plan amendment, or regional amendment, to address the need to remove large but young fire intolerant species to create resilient forest conditions. Until now, we had been informed that there was a lack of capacity and funding for such an amendment. Now that the agency is undertaking a more comprehensive analysis, it is essential that the Forest Service get it right. We are concerned that if the Forest Service is unable to produce a final EA for this amendment that is legally sufficient, the Malheur National Forest will be functionally precluded from implementing future project-level forest plan amendments to address degraded conditions, which in turn will compromise ecological integrity on the Forest. Such a situation would also be enormously disappointing to BMFP, which has staked extensive political capital on the validity of an alternative approach to the 21" rule.

In light of this background, BMFP requests that the Forest Service revise the EA to reflect the following comments.

Comment #1: Clearly distinguish between alternatives.

The EA must clearly distinguish between alternatives, be clear and concise about the quantitative and qualitative effects of alternatives, and create a clear basis of choice between alternatives.

Simulating typical timber harvest in the Forest Vegetation Simulator (FVS) using Forest Inventory and Analysis (FIA) plot data is a reasonable and appropriate basis for quantifying expected effects of the alternatives. However, the discussion of assumptions and indicators on pages 16-27 is muddled. This analysis does not need to be complex or difficult to understand. The Forest Service is permitted to tailor the scope of the analysis to a particular need. In this case, the need is to make stands more resilient to anticipated

future change and better conserve old trees. A few simple indicators such as stand density, basal area, species composition, etc. can be used as reasonable surrogates for meeting this need.

The EA should first lay out the specific science, preferably distilled into a quantitative scale, demonstrating how risk and resiliency to common disturbances such as insects, drought, and uncharacteristic fire change as stand density, basal area and species composition change. Then, it should describe how FVS modeling was conducted and how typical timber harvest under different alternatives is expected to influence those factors. Qualitative distinctions such as "more resilient" or "increased" do not provide a clear basis of choice. It is hard to determine whether it is a 5%, 50% or 500% increase. While an exact number will always be imperfect, there are plenty of graphical expressions such as tables and charts that can help show the range of likelihood.

This should not be a burdensome demonstration. Suggested Stocking Levels for Forest Stands In Northeastern Oregon and Southeastern Washington: An Implementation Guide for The Umatilla National Forest (Powell 1999) established extensive quantitative tables to help silviculturists identify the stocking levels at which the local ecosystems would be resistant at least to insect and drought stress. A qualitative analysis of stand resilience to

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future disturbance and climate flows logically from this quantitative analysis. 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.

Comment #2: Analysis of alternatives and distinction between alternatives should be clearly tied to the extent to which the alternative is likely to accomplish the desired change.

The EA does a good job of identifying a need for change. The effects analysis and evaluation of alternatives should be clearly tied to this need for change. For instance, the EA clearly identifies a need to adapt stands to future climate and disturbance regimes by significantly reducing within-stand competition, shifting species composition to fire and drought tolerant species, and conserving old, fire-tolerant tree species (pp. 7-8). Although Table 19 appears to show the Adaptive Management Alternative as the first choice for many outcomes, Table 4 shows the outcomes for the explicitly stated goals of this proposed policy change. Importantly, page 40 clearly shows that Old Tree Standard is likely to result in the most old trees left on the landscape in the long run - one of the oft-repeated goals of this amendment process. The final decision should explicitly evaluate alternatives with respect to the degree alternatives accomplish the stated objectives of the amendment.

Comment #3: Clearly identify the substantive requirements of the 2012 Planning Rule that are related to the proposed amendment and incorporate a new plan component that meets those requirements.

As you know, the Forest Service must clearly identify the substantive requirements of the 2012 Planning Rule (36 C.F.R. Part 219) that are related to the proposed amendment and incorporate a new plan component that meets those requirements. *Cowpasture River Pres. Ass'n v. Forest Serv.*, 911 F.3d 150 (4th Cir. 2018); *Sierra Club, Inc. v. United States Forest Serv.*, 897 F.3d 582, 601 (4th Cir.). While the EA identifies some of the substantive requirements of the 2012 rule in passing on pp.13-14, it is silent about how these substantive requirements are addressed ( or not) by the proposed alternatives. The EA also fails to identify other relevant substantive provisions of the 2012 planning rule that are implicated by the amendment, including but not limited to opportunities for landscape scale restoration, 36 C.F.R. [sect] 219.8(a)(l)(vi), and actions to maintain or restore ecological integrity, 36 C.F.R. [sect] 219.9(a)(1). The EA should explicitly evaluate alternatives in terms of their ability to synchronize Forest Service management with the requirements of the 2012

rule. As written, the EA lacks the requisite discussion of how the alternatives comply with the 2012 planning rule as amended.

Comment #4: The EA should clearly explain the scale at which analysis is occurring and analyze effects at the appropriate scale.

The EA should clearly explain the scale at which analysis is occurring. For example, Table 4 states that the Old Tree Standard would result in a 1.5% increase in the dominance of firetolerant species. But across what scale? The entire nine-million-acre analysis area

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including all the Wilderness and non-forested lands? Across just the forested lands? Or only in the stands actually treated?

Similarly, page 40 states that

Modeling with FVS indicates that continued implementation of the Current Management Alternative will result in an average of 7.0 old trees per acre following thinning. The Old and Large Tree Guideline will result in an average of 7.4 old trees per acre following thinning (a 5.7% increase over current management). The Old Tree Standard Alternative will result in an average of 8.9 old trees per acre following thinning (a 27.1% increase over current management), and the Adaptive Management Alternative will result in an average of 5.7 old trees per acre following thinning (an 18.6 decrease from current management).

You can't possibly be asserting that in stands in which this Guideline applies - those outside of LOS - there are currently an average of 8.9 old trees per acre across the entire planning area. If there were, these stands would be considered to be within LOS in most cases. In order to make sense of this, you must be averaging in plots with existing old growth. Or, perhaps you are equating large trees (of which there probably are 8.9 per acre) with old trees. Or perhaps you mean that in 25 years there will be 8.9 old trees per acre,

because that is also technically "after thinning"? This needs to be clarified.

In any case, the lack of appropriate reference points mars both these analyses, and several others throughout the EA. These missing scales make it impossible to determine the magnitude of the impact, relative to the context in which the impact is occurring.

There are numerous spatial and temporal scales at which the results of the policy change will be relevant. It is important to note that at the landscape level, none of the proposed alternatives will have significant impacts because we simply are not treating a large enough percentage of the ground to change those trajectories. However, at the stand level, and in several cases at the watershed level, the action alternatives will change the trajectory of old-growth persistence, species composition, and fire behavior. Given the social importance of old growth (and the purposes of this amendment), it is important to acknowledge how the proposed changes will likely affect the risk to old trees in the stands that are actually treated.

Comment #5: Address the effects on carbon storage.

The EA should include a discussion of the potential effects of the alternatives on carbon storage, or a rationale for why this discussion should be deferred to other programmatic or site-specific NEPA analysis.

Harvest, transportation, manufacturing, etc. of timber in the Pacific Northwest releases significant greenhouse gases to the atmosphere. Much carbon (C) in harvested timber is lost quickly to the atmosphere via fire and/or accelerated decomposition. The remainder of harvested timber typically becomes relatively long-lived wood products ( e.g., dimension

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lumber in a house) and is not immediately lost to the atmosphere. In some scientific analyses, these long-lived wood products are not expected to persist as long as unharvested timber, and the difference between the longevity of C in long-lived wood products and the longevity of unharvested wood within forested landscapes represents a

net C emission to the atmosphere. The amount of below-ground C is also an important factor relevant to a climate analysis.

It is probably not appropriate to quantify harvest-related C emissions in the EA for four reasons: First, the EA does not authorize an actual increase in timber harvest relative to the no-action baseline. Second, any increase in timber harvest from the no-action baseline that will result from implementation of any action alternative will be analyzed in additional programmatic or site-specific NEPA that can more accurately quantify C stores and emissions. Third, any increases in timber harvest from the no-action baseline are contingent on economic conditions and demand for timber that cannot be reliably assessed in this EA. Fourth, even if implementation of any action alternative results in increased timber harvest, it is likely that this increase in timber harvest will result in lower timber harvest elsewhere and so not represent a net increase in atmospheric C. Put another way, timber harvest from federal lands in eastern Oregon is tightly integrated with the global market for timber products. C emissions are a consequence of that global market and not relatively insignificant modifications to federal policy contemplated by this EA. Put yet another way, C emissions that result from modifications of federal policy should only be considered a net addition of C to the atmosphere if there is reason to believe that federal policy change will result in more total timber harvest than would occur without policy change.

It is appropriate, however, for the EA to disclose the likely effects of action alternatives on landscape-scale carbon dynamics. A variety of studies show that typical forest restoration treatments that reduce overall stand density, protect old-growth trees, and moderate fire behavior result in increased relative carbon storage over time. See for instance:

[bull] Stephens, S. L., Westerling, A. L., Hurteau, M. D., Peery, M. Z., Schultz, C. A., & Thompson, S. Fire and climate change: conserving seasonally dry forests is still

possible. *Frontiers in Ecology and the Environment*.

[bull] Hurteau, M. D., Liang, S., Westerling, AL., & Wiedinmyer, C. 2019. Vegetation-fire feedback reduces projected area burned under climate change. *Scientific reports*, 9(1), 1-6.

[bull] Hurteau, M. D., North, M. P., Koch, G. W., & Hungate, B. A (2019). Opinion: Managing for disturbance stabilizes forest carbon. *Proceedings of the National Academy of Sciences*, 116(21), 10193-10195.

[bull] Liang, S., Hurteau, M. D., & Westerling, A L. (2018). Large-scale restoration increases carbon stability under projected climate and wildfire regimes. *Frontiers in Ecology and the Environment*, 16( 4), 207-212.

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[bull] Krofcheck, D. J., Hurteau, M. D., Scheller, R. M., & Loudermilk, E. L. (2017). Restoring surface fire stabilizes forest carbon under extreme fire weather in the Sierra Nevada. *Ecosphere*, 8(1), e01663.

[bull] Hurteau, M. D., Liang, S., Martin, K. L., North, M. P., Koch, G. W., & Hungate, B. A (2016). Restoring forest structure and process stabilizes forest carbon in wildfireprone southwestern ponderosa pine forests. *Ecological Applications*, 26(2), 382-391.

Comment #6: Improve the Cumulative Impacts Analysis.

The EA must include a cumulative impact analysis. The EA has a section entitled "Cumulative Effects" (pp. 105-106), but this section contains no actual cumulative impact analysis. Cumulative impacts analysis must evaluate "the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions" ( 40 C.F.R. [sect] 1508. 7). "[I]n considering cumulative impact, an agency must provide 'some quantified or detailed information; ... [g]eneral statements about possible effects and some risk do not constitute a hard look

absent a justification regarding why more definitive information could not be provided."

Neighbors of Cuddy Mountain v. U.S. Forest Serv., 137 F.3d 1372, 1380 (9th Cir. 1998).

The Forest Service may satisfy NEPA by aggregating the cumulative effects of past projects into an environmental baseline against which the incremental impact of the action alternatives is measured. League of Wilderness Defenders-Blue Mountains Biodiversity Project v. U.S. Forest Serv., 549 F.3d 1211, 1216-18 (9th Cir. 2008). But the Forest Service in this EA does not do this. At a minimum, 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. League of Wilderness Defs./Blue Mountains Biodiversity Project v. Connaughton, 2014 WL 6977611, at \*6-9 (D. Or. 2014).

Similarly, the Forest Service should address whether the outcomes predicted by FVS will change if prescribed and/ or managed wildfire fire is applied post-mechanical treatment. Although prescribed fire is neither authorized or precluded by any of the proposed alternatives, its use is widely understood to be a best practice in the vast majority of restoration projects in the geography to which this policy applies. While prescribed fire is not occurring on all the acres on which it is recommended, its use is increasing year to year. Public sentiment is shifting, and bills have been introduced in Congress funding more prescribed fire to help reduce wildfire risk.

Comment #7: Address the effect on wildfire resilience.

The EA should contain an effects analysis regarding how the alternatives affect the forest resilience and resistance to wildfire. One of the reasons to undertake this amendment is to

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reduce the effects of uncharacteristic wildfire, which occur as a result of climate change and historical mismanagement of our forests, particularly fire suppression. And yet there is no

discussion at all in the EA about how each alternative may change fire behavior, even though the agency recognizes that two of the substantive provisions of the 2012 planning rule that are implicated by this amendment are 36 C.F.R. [sect] 219.8(a)(1)(iv) ("System drivers, including dominant ecological processes, disturbance regimes, and stressors, such as ... wildland fire ... ") and 36 C.F.R. [sect] 219.8(a)(1)(v) ("Wildland fire and opportunities to restore fire adapted ecosystems").

A variety of models are available to Forest Service analysts to estimate the risk of uncharacteristic fire based on variables, such as vegetation density and large tree prevalence, which will be affected by this policy change. Please provide information that will help the public and the decision maker quantify the change in fire risk that will occur as a result of treatments under the various alternatives.

Comment #8: If the Old/Large Tree Guideline is chosen, revise the language.

If the Forest Service adopts the proposed alternative, the agency should revise the proposed Guideline associated with the proposed action to better comply with the drafting requirements of the 2012 planning rule as amended. We suggest the following revised language:

Outside of LOS, many types of timber sale activities are allowed. The intent is still to maintain and/ or enhance LOS components in stands subject to timber harvest as much as possible, by adhering to the following plan components:

a. GUIDELINE: Managers should retain all old trees that currently exist, and establish conditions to recruit sufficient additional old trees to achieve historic LOS and other desired conditions such as appropriate species composition. If there are no old trees, retain enough of the largest trees to achieve the desired conditions for old forests. Old trees are defined as having visual characteristics that suggest an age ~150 years, based on the best available science. Large trees are defined as grand fir, white fir, or Douglas-fir ~ 30" dbh or trees of any other

species~ 21 inch dbh. Management activities should promote species composition and spatial arrangement within stands and across the landscape consistent with the desired condition. The purpose of this guideline is to maintain or enhance old trees in stands subject to timber harvest.

Comment #9: Under all alternatives the Forest Service should explicitly address the following components of the proposed monitoring standard:

The Forest Service states that an "adaptive management approach [associated with this alternative] would include both implementation and effectiveness monitoring" (p. 11), and proposes the following:

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If restoration treatments prove ineffective at conserving old trees relative to passive management of unmanaged stands, a dbh limit will be re-imposed [monitoring dbh limit]. The dbh limit that would be imposed would prohibit harvest of grand fir, white fir, and Douglas-fir trees fir~ 30 inches and proh:bit the harvest of all other tree species~ 21 inches. This standard is not suggesteci. specifically by the scientific literature but rather is a recognition of trust issues deeply embedded in management activities involving trees in the Northwest The dbh limit would not necessarily be re-imposed across the whole landscape but rather by Potential Natural Vegetation groups (PNV) where restoration has proven ineffective based on an analysis conducted every 5 years by the Pacific Northwest Regional Office. (p.

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The monitoring dbh limit described above, that would be re-imposed should the Old/Large Tree Guideline Alternative prove ineffective "at conserving old trees relative to passive management of unmanaged stands," effectively constitutes an additional a/tern a tive that has not yet been analyzed. This should be corrected.

The monitoring standard described above proposes to assess the effectiveness of Old/Large Tree Guideline treatments "at conserving old trees relative to passive management of unmanaged stands." The Forest Service should explain why it is using passive management of unmanaged stands in eastside disturbance-driven forests as the reference condition for assessing the effectiveness of the Old/Large Tree Guideline at conserving old trees. At the very least, it should compare this to assessing the effectiveness of Guideline treatments in terms of how well they move treated landscapes towards historic LOS and other desired conditions such as appropriate species composition.

The Forest Service should explain why it would adopt the monitoring dbh limit described above rather than the no action alternative, Old Tree Standard, or Adaptive Management alternative, particularly as the 21" rule-a diameter limit-is known to compromise restoration efforts, and be less effective at conserving old trees compared to, for example, the Old Tree Standard. Therefore, the Forest Service should answer the question "what relevant ecological difference exists between the 21" rule and the monitoring dbh limit that would make the latter more likely to effectively conserve old trees of the appropriate species composition?" Analysis of the proposed monitoring dbh limit would help here.

During a public meeting we understood Shane Jeffries, Forest Supervisor of the Ochoco National Forest and Decision Maker for which alternative is selected, to say the USFS would revert back to the current Wildlife Standard ( or 21" rule) if monitoring didn't happen.

Although we have been unable to find such direction explicitly proposed in the Preliminary EA, we want to address it in two ways.

First, before a decision is made, we encourage the Forest Service to clarify what will happen if monitoring fails to occur. Second, assuming we understood Mr. Jeffries correctly, we note that per the Forest Service's analysis, the Old Tree Standard is more effective at conserving old trees than the Old Tree/Large Tree Guideline, and the latter is more effective at conserving old trees than the 21" rule. Given this, the Forest Service should

explain why it would re-impose the 21" rule if monitoring fails to occur. Or why it would re-impose the 21" rule rather than implement the Old Tree Standard. This makes no ecological sense per the analysis provided to date if the Forest Service's end goal is the conservation and propagation of old trees.

We do not support the Forest Service's proposal to revert to the 21" rule if monitoring fails to occur. We are concerned that it is highly unlikely the Regional Office will be either able or willing to execute the monitoring as described above at the scale needed over time to assess treatment effectiveness given limited agency resources. Given this, and given the analysis of alternatives to date, while it makes sense to adaptively manage timber harvests based on robust monitoring results, it makes no sense whatsoever to revert to a standard that is known to result in worse ecological outcomes just because monitoring didn't occur-which is what the Forest Service has proposed. The Forest Service should provide a scientific explanation for why it would do this.

We support the Forest Service's commitment to monitoring and adaptive management as part of the proposed plan component. Based on the above comments, we suggest the following revised monitoring language be added to the Old/Large Tree Guideline

Alternative:

STANDARD: The purpose is to monitor management actions to determine whether old trees, and where old trees are unavailable, large trees, are increasing on the landscape. Monitoring will determine if treatments are successful in maintaining old trees and moving forests towards historic LOS and other desired conditions such as appropriate species composition. Collected data shall be made publicly available every year, and analyzed in a progress report every five years or when data indicates significant changes in old tree demographics. If monitoring results

indicate that landscape treatments do not result in the conservation of old trees or other desired conditions relative to passive management, then the reasons will be identified and future site-specific treatments will be modified to facilitate conservation of old trees and other desired conditions to better meet historic LOS.

Comment #10: If the Old Tree Standard is chosen, include a monitoring requirement.

If the Forest Service adopts the Old Tree Standard alternative (which we support), BMFP proposes that the Forest Service also adopt the monitoring Standard proffered above as well: monitoring is essential to determining whether the Forest Service is obtaining the desired future conditions, as well as to developing public trust in agency actions. We propose this for two reasons. First, monitoring should occur in an adaptive management context regardless of which alternative-guideline or standard-the Forest Service selects. Which means the Forest Service should explain why it does not adopt a monitoring standard for this alternative, if it decides not to.

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Second, it has been argued that since the Old Tree Standard is a standard, outcomes need not be monitored since managers have very little discretion in implementation. Which is not an accurate characterization. The Old Tree Standard actually offers managers quite a lot of discretion to manage all the other aspects of a stand other than old trees. Since the standard would actually only apply in areas that are "outside LOS" that's not likely to be a lot of trees. In many stands, that's no trees. In such cases, the Old Tree Standard is no different from the adaptive management alternative, and there is no debate about whether there is a need for monitoring under the Adaptive Management Alternative.

In the "remainder" of the basal area, managers would still be directed to maintain and enhance LOS in a manner consistent with HRV for the site. Whether this vague direction will actually result in moving stands toward HRV is an important question that - if

answered reliably - should help build trust and improve adaptive management.

The BMFP is interested in developing a socially durable policy which is grounded in accurate scientific analysis. Despite excellent science in the field, there continues to be debate about the actual effects of treatments on old growth and wildlife. A transparent, publicly accessible monitoring system will help assure that everyone has to work with the same set of facts. To that end, we suggest the following plan direction:

**STANDARD:** The purpose is to monitor management actions to determine whether old trees, and where old trees are unavailable, large trees, are increasing on the landscape. Monitoring will determine if treatments are successful in maintaining old trees and moving forests towards historic LOS and other desired conditions such as appropriate species composition. Collected data shall be made publicly available every year, and analyzed in a progress report every five years or when data indicates significant changes in old tree demographics. If monitoring results indicate that landscape treatments do not result in the conservation of old trees or other desired conditions relative to historic LOS, then the reasons will be identified and future site-specific treatments will be modified to facilitate conservation of old trees and other desired conditions to better meet historic LOS.

**Comment #11:** The EA should distinguish the ecological significance of old trees from large (but young) trees.

The EA should distinguish between the relative ecological value of old trees versus large (but young) trees. Old trees play critical and unique ecological roles in the dry forests that differ profoundly from any provided by young trees, even of large size. They are not simply enlarged versions of younger trees. The crowns of old trees typically incorporate very large branch systems as well as other decadent features, which provide unique habitats for

wildlife and other biota. Their thick bark contributes to their tolerance and relatively high resistance to fire. Their long persistence has typically allowed Jld trees to develop extensive root systems and mutualistic networks (through root grafting) that contributes to their drought resistance as well as movement of deep soil water into surface soils. The large percentage of heartwood in stems results in wood that is more resistant to decay,

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which, among other things, results in snag and log decay patterns that provide unique specialized habitats for vertebrates, invertebrates, and other biota. The EA should capture this difference and explain the relative ecological effects of retaining or removing old versus large trees.

Comment #12: The EA should clarify that LOS was always meant to include additional morphological characteristics of age besides diameter.

As described above, old structure has different ecological import than large structure. As managers work to restore LOS - Late and Old Structure - they need clear guidance that this does not simply mean a forest of young trees greater than 21 inches.

Comment #13: Consider a plan amendment specific to the Malheur National Forest.

The Forest Service should consider a plan amendment specific to the Malheur National Forest. The Malheur National Forest has a robust monitoring and adaptive management program in place. Collaborative adaptive management to conserve old trees on the Malheur NF is already resulting in cutting of trees > 21" in cases where this is necessary to achieve conservation of old trees and stand and landscape-scale resilience objectives. For the purposes of forest restoration actions on the Malheur NF, the Forest Service's proposal to revise the 21" rule is largely a housekeeping measure that obviates the need for continued project-specific forest plan amendments. Should the Forest Service move forward with this amendment process, it may be prudent to allow the Malheur National Forest move forward as a pilot project, with robust (and funded) monitoring and adaptive

management. If the pilot on the Malheur continues to show progress towards conserving and propagating old trees, it may form the basis for other forest-specific amendments.

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#### Conclusion

In conclusion, we appreciate the Forest Service's work on an amendment to the 21" rule. It is essential that the agency get this amendment right: that it is legally, ecologically, and socially rigorous and durable, and is calculated to result in the conservation and propagation of old growth trees on the landscape (something that must be determined based on monitoring and adaptive management). The draft EA is a good start, but requires additional work in order to meet that objective. We hope that the foregoing comments assist the Forest Service in that endeavor.

Sincerely,

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