

Data Submitted (UTC 11): 10/8/2020 7:00:00 AM

First name: Anon

Last name: Anon

Organization: Crook County

Title: Commissioners

Comments: Dear Mr. Jefferies:

Crook County, Oregon, established in 1882, is home to approximately 25,000 people located in the communities of Prineville, Powell Butte, Lone Pine, Post, and Paulina. Crook County is tied to its natural resources where forest products, agriculture, recreation, tourism, and now a growing high-technology industry that constitute a majority of its economy. These natural resources help provide jobs, create a desirable place to raise children, and offer unique habitats for a variety of vegetation as well as an abundance of fish and wildlife.

In 2017, Crook County adopted a Natural Resources Policy. This policy guides the County as it acts to fulfill its role in providing for the health, safety, and welfare of its citizens in coordinating discussions with our federal land management partners in compliance with the National Environmental Policy Act, the National Forest Management Act, and the Federal Land Policy and Management Act. The use of public and federal land (collectively denoted as federal land) is critical to the health, safety, welfare, and economic stability of Crook County citizens. The Court recognizes the inherent natural beauty and the quality of life afforded to the citizens and visitors to Crook County.

In June of this year (2020), Crook County sent you a letter in support of the Eastside Screen review, specifically for the purpose of amending the 21-inch DBH limit. This limit, whose original intent was only to be interim, has had a significant detrimental effect on forest management on six National Forests in Oregon and Washington for the last 25 years. This limit has created a firm metric and the forest eco-systems cannot be realistically managed within the metric. The 21-inch limit is a flawed metric for attempting to manage diverse forest conditions across two-thirds of the State with a single diameter limit. The limit has failed to allow forests in eastern Oregon to reach their desired conditions of late, and old structure, and

requires them to consistently initiate costly processes which seek to pursue project-specific plan amendments to modify the 21-inch rule. Crook County urges Region 6, USFS, to select an alternative that is based on science and that will assist, rather than prohibit, forest professionals in attaining desired end results.

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Crook County was heavily impacted by the Eastside Screens and the 21-inch limit. All of the sawmills that were once located in Prineville have gone out of business: Pine Products, Ochoco Lumber, Hudspeth Pine, Consolidated Pine, and Crown Pacific. The loss of these jobs crippled Crook County and our communities. The County received limited assistance from the Secure Rural Schools payments but those are slowly drying up. While we may not have any sawmills left in Crook County, National Forest management remains an important driver for Crook County with timber sales and other restoration work taking place.

Crook County encourages the Forest Service to adopt the alternative that attains the highest level of ecological integrity, attains the described purpose and need of the project to a high level, and advances the objective of the Interim Wildlife Standard of the Eastside Screens, which is to maintain and develop late and old forest structure.

First, Crook County supports the decision to just eliminate the 21-inch limit. The existing Interim Wildlife Standard section d.2.b requires the Forest Service to "manipulate vegetative structure that does not meet late and old structural conditions, in a manner that moves it toward these conditions." The 21-inch rule, identified in section d.2.a, serves simply as a prescription to attain what is described in d.2.b. Therefore, its removal would not alter the overarching directive in the standard. The varied and diverse nature of "vegetative structure"

across eastern Oregon is the very reason why the current descriptive element is counterproductive. We cannot identify another descriptive element that would be adaptable to the diverse "vegetative structure" across eastern Oregon in a way that would assist forestry professionals with attaining "late and old structural conditions" effectively. Therefore, our full support falls upon the Adaptive Management Alternative as described in 2.4 of the Preliminary EA. The Forest Service should recognize that the "emphasis" on large and old trees in the proposed alternative already exists in the Interim Wildlife Standard. Reemphasizing this is unnecessary and redundant. Adopting a different version of the 21-inch rule with new descriptive elements today will surely prove un-durable to future land managers and stakeholders.

Section 3.1.6.2 of the Preliminary EA considers the environmental effects to late and old structure forest. This analysis made the following conclusion regarding the Adaptive Management Alternative as it applies to "Open Conditions in Dry and Moist Forests Inside of LOS":

Management adaptability to project and site-specific conditions in order to maintain and develop more open LOS will be greater than all other alternatives because tree selection would be based on project and site-specific desired conditions.

This analysis made the following conclusion regarding the Adaptive Management Alternative as it applies to "Open Conditions in Dry and Moist Forests Outside of LOS":

Management adaptability to project and site-specific conditions in order to maintain and develop more open conditions would increase more than all other

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alternatives because tree selection would be based on project and site-specific desired conditions.

These conclusions clearly indicate that the Adaptive Management Alternative excels above both the Proposed Alternative and the Old Tree Standard Alternative in terms of development and maintenance of late and old structure forest. These conclusions also indicate that the Adaptive Management Alternative meets the Purpose and Need of a "science-based" alternative and the project objective of the "maintenance and abundance of late old forest structure" to a higher degree than the other action alternatives. These scientifically analyzed results, coupled with the Interim Wildlife Standard's objective of "maintaining and enhancing late and old structure forest", should compel the Forest Service to select the Adaptive Management Alternative over the Proposed Alternative. Selecting an alternative that attains the much desired end-results outlined in the current standards to a lesser degree would be puzzling. The environmental effects analysis of other resource components also concludes that the Adaptive Management Alternative yields superior outcomes.

Crook County is additionally interested in how the alternatives analyzed support jobs and income in the County. As illustrated on Pg. 60 of the draft EA, Crook County still has a high proportion of its population working in industries that generate income and employment from processing forest products and are more susceptible to changes in timber markets and supply of timber from National Forests. Pg. 60 also emphasizes the importance of the federal timber supply to mill success. Prior to the adoption of the eastside screens, the Ochoco National Forest was harvesting approximately 150 mbf per year. Following the adoption, harvest rates dropped to near zero and today (2020), the Forest reports harvest levels around 15 mbf. The Adaptive Management Alternative is ranked as having the highest benefit to local economies. The local

wood manufacturing infrastructure in eastern Oregon counties and communities should be recognized as critical to not only supplying our nation with wood products, but also to completing the necessary restoration work on national forestland that is desired. The removal of small diameter trees is currently extremely economically marginal-losing what infrastructure we currently have will only exacerbate that issue.

In closing, the replacement to the 21-inch rule should be one that assists land management professionals with attaining the objective of maintaining and developing late and old forest structure. It should be based in science and designed to be an aid not an obstacle. It should be based on the assumption that land managers can be trusted to use their expertise to design silvicultural prescriptions to meet any desired condition rather than on distrust that they need confines to attain results. These management professionals should be given standards and guidelines that allow them to exercise their professional judgement and expertise freely without the shackles of firm limitations that are unsupported by science and unadaptable to the diverse forests in eastern Oregon. The Adaptive Management Alternative best meets the purpose and need of the project by adopting durable standards and guidelines that are adaptable to future, unforeseen conditions and science-based standards and guidelines that attain the desired end results of late and old structure forests better than the other alternatives analyzed or the current standard itself. Crook County fully supports and encourages the adoption of the Adaptive Management Standard.

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Crook County thanks the Forest Service for this review of the existing, interim rule and looks

forward to participating in the adoption of the new guidelines. Thank you for your  
consideration of these comments. If you have any questions, please contact Tim Deboodt,  
Crook County Natural Resources Policy Coordinator, 541-903-5903 or  
[tim.deboodt@co.crook.or.us](mailto:tim.deboodt@co.crook.or.us).

Sincerely,

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