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First name: Michelle

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Organization:

Title:

Comments: Dear Shane Jeffries, IDT Members, and Specialists;

Although I am definitely a supporter of updating direction to include the best available science, I do not support this amendment in this form.

In my experience with Forest Service NEPA projects (specifically on the Fremont-Winema N.F.) I have seen a pattern of flagrant disregard for requirements under the direction of the Eastside Screens and the two Forests LRMPs. Many times, these liberties were taken as a result of either managerial or administrative pressure, or in the guise of the importance of utilizing special authorities like "Good Neighbor". I was told by one project lead, "If we followed all of the rules, we would never get anything done." While these choices could have been made good under NEPA with a genuine effort to complete evaluations for SIRs after the fact, at very best there might have been a cursory effort of review as a gesture. With this and other inconsistencies in mind, I simply do not trust the Forest Service to work through a NEPA analysis, generate Decision(s), and follow through implementation with an eye toward science, requirements under direction, and identification of what is most prudent for the resources on the ground rather than bowing to administrative, financial, or political pressures.

With this and other experiences in mind, I can't accept that the Forest will exercise additional latitude and still retain the number and configuration of large trees necessary for healthy forest ecosystems now and into the future. While the current 21" rule may be overly conservative, in my personal experience the Forest Service has not demonstrated the ability to exercise good scientifically-based discretion in dealing with large and old trees consistently across the landscape. Simply put, a convention that requires retention of trees over 21" provides at least some form of guarantee of retention.

I support a continuation of case-by-case amendments, where scientifically and environmentally appropriate, as identified through sound NEPA analyses.

Sincerely;

Michelle Jones