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Comments: I wish to encourage the adoption of the Adaptive Management Alternative in which the 21-inch diameter limit is removed for all tree species. This Alternative will yield the flexibility to develop site-specific plans for the continued promotion of Late and Old Structure (LOS) within appropriate areas. The Adaptive Management Alternative places the focus on objectives and outcomes rather than limiting both planning and practice by rules as happens with the retention of the current 21-inch rule or implementing the Old Tree and Large Tree Guideline.

There is mention in the Draft EA of the need for a departure from the current 21-inch rule using science-based knowledge. I agree; a change is necessary. However, the forests of Oregon's east side are variable and our knowledge of climate change, fire regimes, and the need for carbon storage have increased and will continue to increase in the future. Good forest stewardship demands that we continuously apply all of our knowledge to make management plans and decisions using a science based approach that is site-specific. We need to avoid applying simplistic rules over very large areas. The forests of eastern Oregon are varied with differing environments and biological communities and should not be managed with a broad-brush, the one-size-fits-all approach. In other words, we need to develop site-specific plans and decisions based on both general knowledge and the specific knowledge a site's particular environment and potential biological community. The creation and maintenance of diverse, complex forest structure to support diverse biological communities is best done in a very site-specific manner.

The Proposed Action of implementing the Old Tree and Large Tree Guideline would raise the diameter limit for some tolerant and mid-tolerant species and will yield some additional flexibility to allow site-specific management of eastside forests. However, raising the diameter limit for only some species is again kicking the can down the road as did the original Eastside Screens. All the Proposed Action does is creates a more elaborate set of limits and retains the focus on rules rather than outcomes.

The Adaptive Management Alternative will allow flexibility to incorporate new knowledge and new objectives in the planning process. As we learn more about climate change, fire regimes and the potential for carbon storage in eastside forests and there will likely be the need for increased flexibility in how we reach the outcomes for these forests. The Adaptive-Management Alternative is the best alternative to allow potential changes without rewriting rules while still retaining the overall outcome of promoting LOS. The Forest Service has the expertise present (wildlife biologists, foresters, and other applied scientists) to create and implement these site-specific plans that focus on the outcome of promoting LOS. I believe trust within the communities of people who value forests will be fostered and strengthened by the results of implementing good, site-specific plans that create outcomes and promote LOS rather than simply having a diameter rules in place.

It is for these reasons, that I encourage the adoption of the Adaptive Management Alternative.