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Organization: Harney County Natural Resources Advisory Committee

Title: Harney County Commissioner

Comments: Shane Jeffries, Forest Supervisor

Ochoco National Forest

3160 NE Third Street

Prineville, OR 97754

In Reply To: Eastside Screens Plan Amendment

Dear Mr. Jeffries:

Harney County Natural Resources Advisory Committee (a natural resources advisory committee to the Harney County Court) is encouraged that the Forest Service is proposing amendments to the 21" rule established under the guidelines commonly referred to as the Eastside Screens. It is our understanding that those guidelines, including the 21" rule, were developed over 25 years ago with limited public engagement and scientific review. We are glad to see that the Forest Service is attempting to not replicate those shortcomings and instead facilitating a robust public engagement process and scientific review. We hope that this process will yield a well-informed amendment that is supported by the majority of the interested public in eastern Oregon.

Harney County is 75 percent federal land and management of those lands deeply affects the County on many levels. Our population has declined over the past 50 years as timber harvests on the Malheur National Forest have declined. In the meantime the woody vegetation has dramatically increased on National Forest lands. As with wildfire, watersheds are a function of all lands they encompass and public-private boundaries are on maps only. During the past 50 years watershed conditions in the Harney Basin have changed and the Basin is now suffering from a significant water deficit. While there are numerous reasons for this deficit, one of the major ones is the lack of active management on National Forest lands and the encroachment of ponderosa pine and western juniper onto lands that were historically grass steppe. Removal of this unwanted woody vegetation is extremely expensive. More effective and economical forest management in appropriate areas will provide some additional revenues for removing and improving rangeland conditions. Much of Harney County is characterized by extremely moisture limited sites with limited carrying capacity for forest and rangelands. If vegetation isn't management more closely to historic patterns wildfire will destroy these ecosystems and the return to healthy conditions will be many years in the future.

We look forward to an amendment that is adaptable to the complex forest conditions across eastern Oregon that will permit Forest Service professionals with the flexibility to manage on a stand-by-stand basis for desired outcomes. Our understanding is that the current credible science has identified the limitations and flawed nature of a one-size-fits-all approach to forest management. That science has highlighted specific instances where desired outcomes were not fully met due to the arbitrary nature of the 21" rule. Our understanding is that these undesirable outcomes have often resulted in unnaturally high levels of forest density that has exacerbated fire risk and insect infestation. These forest conditions are extremely concerning to us and we are supportive of any modification and modernization that will address these undesirable conditions surrounding our communities.

Please consider this letter in support of the Adaptive Management Alternative described in Section 2.4 of the Preliminary EA. We look forward to the new guidance that's developed and hope to continue to engage in the amendment as it progresses.

Sincerely,  
Harney County Natural Resources Advisory Committee