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Comments:

Hello,

I write as a person who has taught forest ecology courses at Portland State University for more than the last 45 years. I have spent extensive time both on the ground as well as in the air observing and monitoring the management of our National Forests both westside and eastside. I have also been involved in research on the Wallowa -Whitman National Forest.

First of all, I have a major, global reaction to this Environmental Assessment, which attempts to lay out and support a very impactful "Forest Plans Amendment; Forest Management Direction for Large Diameter Trees in Eastern Oregon". I find the present use of a quickly executed Environmental Assessment for such a major change in the management of so many forests to be fundamentally inappropriate. Your analysis and document involves - - - a "proposed amendment to the Eastside Screens' wildlife standard" that "would apply to the Deschutes, Fremont-Winema, Malheur, Ochoco, Umatilla, and Wallowa-Whitman National Forests." Rather than this EA, a full EIS process needs to be done in order to responsibly address the major array of issues that impact such a huge land area. An EIS provides an opportunity for an appropriate in-depth analysis to provide a basis for responsible decision-making. Unfortunately, the USFS appears to be responding to precisely the kinds of pressures that are the fundamental sources of our major environmental problems. By this I mean the clear evidence that the Trump Administration's environmental policies show evidence of blatant arrogance, ignorance, and greed. These features of human behavior are unfortunately fundamental to our major environmental problems. My bottom line here is that this EA needs to be withdrawn and a full EIS needs to be done.

I am aware of and have taught about the classic Eastside "Screens" that were developed to protect essential and vanishing features of forest ecosystems and structures, especially the significant deficiency of large trees and the snags they form. Both are essential components of functioning ecosystems, as opposed to "tree farms". I see in your analysis an acknowledgement that the large tree component of eastside forests has gotten both larger and older, since 1995. I also see the recognition that there has not been much success in having the large and old tree component of eastside forests change significantly. Clearly, this is difficult in a mere 25 years. I agree that there has been a shift in forest structure toward shade tolerant trees. I strongly support protecting trees on the basis of BOTH size and age, not on the basis of either as this EA proposes. In other words, the essence of the Eastside Screens needs to remain in place as STANDARDS that are adhered to rigorously, not be degraded to be mere guidelines. In this regard, I support what appears to be a clear emphasis on protecting the "classic" tree of this region, the Ponderosa Pine, by means of commercial thinning of competing trees. I also do recognize and support the need and your desire to work against the shift in species composition toward grand fir and white fir. However, I strongly object to your intention to "harvest some old trees", especially if they are Ponderosa Pine, and I feel it is likely that most if not all large trees of other species also still need full protection too. There is still a deficiency of large tree structure in eastside forests. Thus, I would emphasize that any commercial thinning - - should really be a thinning. Any thinning activity should leave an adequate distribution of large trees of other species, so that the large tree component of these ecosystems can benefit from the presence of those other species. In other words, all large trees need to receive careful consideration to remain on the landscape as the needed thinning is done. This thinning must be done skillfully and with care, so that the leave trees, their root systems, and local soil ecology are all protected. It is essential that the commercial thinning process does not become a Trojan Horse for inappropriate logging of large trees, as it has in the past. To that end, I strongly urge the retention of both clear size and age-based protections for the large trees that are such essential components of these forested ecosystems. Again, I do not feel comfortable with too many features of the planning process that I see here.

Given the above, I remain unclear why an EA is necessary to implement the thinning of smaller trees, an activity that can meet the needs of prudent forest management and the need for providing wood product outputs from these National Forests. The USFS has clearly mainly been doing substantial amounts of thinning on the eastside forests in recent years (something I support and see in your data) - apparently without the need for a planning document such as this EA. There are many dimensions of analysis that need to be covered in an appropriate planning document. These need to include more features of the ecological function of these eastside forests, especially their large tree component. Although there is mention of the impacts of climate change on eastside forests and their fire ecology, those need more analysis. Also the carbon sequestration role of the large trees in these forests needs more attention and analysis. Remember too, logging forests causes significant releases of global warming gasses, so that needs to be considered. The relevance and scientific justification for the 150 year-old criterion is poor. Clearly maintaining adequate numbers of "middle aged" trees needs to be accomplished, so there are trees able to be recruited into the large and old classes of trees. Discontinuities in age distribution need to be avoided.

I would encourage the USFS to pay more careful attention to their public trust responsibilities and to their long-term role as stewards of incredibly important natural systems that are essential for Americans not only over the short term but also into the future.

Thanks for your consideration,
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* Note, this document is an expression of my ideas alone and is not a policy statement on behalf of Portland State. This professional information is for identification only.