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Title:

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Dear Regional Forester Cassamassa

Via email: SM.FS.EScreens21@usda.gov

IN the Matter of: Forest Management Direction for Large Diameter Trees in Eastern Oregon #58050

Our forests have not recovered from decades of unsustainable logging, overgrazing, and fire suppression. There remains a deficit of large and old trees in eastern Oregon that provide habitat for wildlife, protect clean water, build healthy soils, and sequester carbon.

The whole interconnected forest ecosystem of the Eastside forests has evolved to depend upon stands of large trees, and the 21-inch rule aims to allow these trees to once again reach maturity. In addition to the plants and animals that depend on these trees, large trees are natural carbon sinks, and play a key role in the fight against climate change. We are facing an urgent climate emergency. This proposal to eliminate protection for large and old trees is in direct conflict with the need to increase forest carbon storage. Rather than barreling forward, I urge you to consider strengthening - rather than weakening enforceable protections for the oldest and biggest trees that are loaded with carbon.

For over two decades, the Eastside Wildlife Screens have helped protect large trees and the values they sustain. The Wildlife Screens have proved to be a remarkably durable and workable solution that reduced the conflict and controversy that surrounds old growth logging, yet allows the Forest Service to do meaningful work in the forest - including hundreds of timber sales. We're not done restoring the large trees and forests that were decimated by decades of clear-cutting and over-grazing. There is no compelling need to start logging big and old trees. Doing so will only increase conflict and controversy and do tremendous ecological harm along the way.

Eliminating the protections of the Eastside Wildlife Screens and the 21-inch rule seems to be a wolf in sheep's clothing. A proposal that plays into our fears of wildfire - but-- rooted in the timber industry's failed approaches of the past, including: commercial logging and aggressive fire suppression. Wildfire scientists have been telling us for decades that large fires in the American West are primarily driven by extreme weather conditions, not "fuels"- something we saw play out in the Labor Day fires in Oregon. Certain types of fuels reduction projects - such as prescribed fire and non-commercial thinning directly adjacent to communities - can help reduce fire risk under certain conditions. However, top forest scientists have found that thinning forests far from homes does nothing to protect us from wildfire.

Currently, government agencies (including the USFS) spend millions of dollars thinning the landscape in the hope that they can reduce the severity of a wildfire if it burns through the thinned forest; however, data from your own agency shows less than 1% of thinning treatments encounter wildfire each year

[<https://www.pnas.org/content/114/18/4582>]. Maps of this past month's fires also make clear that logging did nothing to stop the spread of fires - in the Holiday Farm Fire perimeter 75% of the land had been previously logged.

I urge you to prioritize the science-based strategies that are proven to protect people and property from wildfire risks and help them be prepared for future fires. It is time to support better planning and emergency responses, and to direct funding and/or any rule amendments to where it makes the most difference - hardening homes and creating defensible space, prescribed fire, and better emergency planning and response. This is no time to double-down on foolish investments in logging that divert money, time, and energy away from protecting our

homes, communities, and forests. Eliminating Eastside screen protection is an invitation to reckless logging, road building, weed invasions, soil compaction and reduction of carbon sinks.

More specifically, this proposal severely weakens protections for large trees include changing protections for large trees from a "standard" to a "guideline." I object to this change. The current standard prohibits the logging of large trees; a guideline would merely suggest that large trees be protected, but is up to the complete discretion of the agency and therefore largely unenforceable.

The USFS has published an Environmental Assessment, rather than opening a scoping process for a more rigorous Environmental Impact Statement-despite the fact that increased large tree logging across six National Forests would clearly have significant environmental impacts. By the USFS claiming that changes to the 21" Wildlife Screens will not have significant effects, the agency can skirt more stringent requirements which would otherwise force them to consider the cumulative impacts of their proposal and "take a hard look" at the alternatives under NEPA.

I urge the agency to open up scoping for a full EIS; or, alternatively, engage in a scientifically-based, true collaborative process with multi-stakeholders to develop a Forest Plan for the Eastside Forests, rather than continuing to cut away the current plan and rules with amendments and elimination of standards and protections. Survival dictates that we need to increase carbon sequestration and retain large trees and mature forests, which store the most carbon. Logging large trees would increase carbon emissions, and is exactly the wrong direction for addressing climate change.

Any change to the screens will have tremendous impacts to fish, wildlife, soil, water, and the climate. It deserves a more robust process for environmental review and public involvement. I urge you to stop this planning process and instead work in good faith with all stakeholders to find an ecologically and socially responsible way to protect our public lands, maintain and protect the greatest carbon sinks, and protect the values that that our public lands support. Your current process and proposals are leading in the exact wrong direction.

This plan amendment process has been controversial and divisive. It has been rushed over the objections of dozens of conservation groups, independent scientists, elected officials, and more. It has led to a draft proposal that entirely eliminates protections for many of the biggest and oldest trees in eastern Oregon and shifts any remaining protections from strong standards into weak guidelines.

This proposal is not narrow in scope. It affects millions of acres of our public lands including riparian areas, roadless areas, scenic areas, and designated wildlife areas across a broad range of forest types. Making the decision of whether or not to protect big trees with discretionary guidelines will increase conflict, further erode public trust, and undo decades of good-faith work by stakeholders to chart a better path forward.

Sincerely,

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