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Organization:

Title:

Comments: January 30, 2024

Re: Conserving large/mature/old-growth, trees/forests on National Forests in Pacific Northwest

Dear USFS,

President Biden's visionary Executive Order (EO) 14072, "Strengthening the Nation's Forests, Communities, and Local Economies," provided a major change on the path to conserving our remaining-vital-populations of large, mature, and old-growth trees. These big, successful trees help combat climate change, provide clean water, stabilize soils, mitigate catastrophic fires, and sustain vital habitat for fish and wildlife. Sadly, evidence shows that all across the country, USFS interpretation and implementation of EO 14072 has been inconsistent, even ignored. Thus, I write today to ask that USFS faithfully implements the President's direction on National Forests in Eastern Oregon and Southeast Washington-areas of particularly lax implementation thus far.

On August 31, a federal judge found that USFS, acting illegally under the direction of the Trump administration, broke multiple environmental laws and weakened long-standing protections for large, mature, and old-growth trees known as the "Eastside Screens." Adopted in 1994, after decades of old-growth liquidation, these Screens provide guidance on the protection of large and old trees on over 7 million acres of public lands in Eastern Oregon and Southeast Washington. Legal challenges were brought by a broad coalition of conservation organizations, with support from the Nez Perce Tribe. The Forest Service's defense of these Trump-era logging rules is not an aberrant case, as there are several examples of rulings against this illegal repeal of Eastside Screens.

As a science educator and environmental activist, I believe that appealing this ruling violates the intent of the administration. It's clear that USFS continues to push timber sales on hundreds of thousands of acres that likely violate the intent of EO 14072 and Old Growth NOI. The Morgan Nesbit, Camp Lick, Green Ridge, and Ellis logging projects in Central and Eastern Oregon show that USFS PNW Region has re-initiated plan revisions for several National Forests. Amending the Northwest Forest Plan shows clearly that USFS is attempting to weaken protections for large, mature, and old-growth forests.

I ask that USFS work to ensure that legal decisions, planning processes, and proposed logging projects are consistent with the intent of President Biden issuance of EO 14072. In particular, I fear the USFS will appeal the judge's ruling in the Screens litigation, in an attempt to create a series of project-specific amendments, and/or use Forest planning to continue proven illegal policies in Eastern Oregon-in spite of strong and broad opposition

from Tribes, scientists, many USFS foresters and managers, and the conservation community.

Resilient communities and strong local economies are possible without sacrificing the irreplaceable values provided by large trees and mature and old-growth forests. Many of us stand ready to work with the USFS on strong, appropriate, and durable solutions that meet the important goals of EO 14072 and the Old Growth NOI. Thank you.

Scott R Bowler