Data Submitted (UTC 11): 9/27/2025 7:00:00 AM
First name: Paul
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Organization: Alembic Enterprises
Title: Owner/Representative
Comments: Dear District Ranger et al.,

Given the lack of formal public input on this project, I respectfully request that this letter be given due regard and included in the official project record.

I am writing to express my strong opposition to the use of an "emergency situation determination" (ESD) for the Mottet Vegetation Management Project (Project #67275). The Forest Service has proposed nearly 19,000 acres of commercial logging within a 48,000-acre project area, advancing this action under the rationale of emergency response to insect and disease outbreaks Such justification is scientifically unsound, procedurally inappropriate, and inconsistent with the intent of emergency authority under federal law.

The scoping documents describe insect and disease activity as the primary "emergency" necessitating immediate action. Yet insect and disease dynamics are long-term ecological processes, not sudden crises. Bark beetles and root rot operate on decades-to-centuries timeframes, shaping habitat, recycling nutrients, and contributing to structural diversity. They do not constitute an emergency requiring landscape-scale clearcutting. Section 40807 of the IIJA authorizes emergency actions only where immediate implementation is required to relieve hazards to human health and safety or to mitigate acute threats to natural resources. By stretching this language to cover diffuse and chronic conditions, the agency undermines both the law and public trust.

The claim that high tree density drives insect and disease outbreaks, and that commercial logging is the remedy, is overly simplistic. The scientific record shows that climate[mdash]especially warming temperatures, prolonged drought, and moisture deficits[mdash]is the dominant driver of both insect epidemics and fire severity (Keyser et al. 2018; Law et al. 2018). Logging does not prevent or stop outbreaks. In fact, "sanitation harvests" often increase stress on remaining trees, spread pathogens, and open stands in ways that accelerate beetle movement (Fitzgerald & Bennett 2013). Mortality and decay play a natural role in forest succession, nutrient cycling, and food webs; removing these trees through logging erases these benefits.

The scale of this project makes the emergency designation even less defensible. Nearly 19,000 acres of commercial harvest is not a targeted intervention, but a sprawling timber program that will unfold over years. True emergencies are site-specific and acute: hazard trees along a road, blowdowns in campgrounds, or sudden localized infestations. The Mottet project, by contrast, represents a wholesale reclassification of forest health issues as "emergencies" in order to fast-track logging.

Ecologically, this approach carries serious consequences. Large, old trees are disproportionately important for carbon storage and forest resilience (Mildrexler et al. 2020). Cutting them reduces the capacity of these forests to buffer climate impacts, increases carbon emissions, and undermines long-term stability (Law et al. 2018). Evidence also shows that intact forests with diverse age structures and fire-resistant species often fare better in wildfire than landscapes subjected to heavy logging (Moris et al. 2022). By focusing narrowly on reducing density through commercial harvest, the Forest Service risks degrading the very attributes that confer resilience.

This misuse of emergency authority sets a dangerous precedent. If insects and disease[mdash]ecological processes that have always been part of forest dynamics[mdash]can be cited as justification for bypassing NEPA across tens of thousands of acres, then nearly any condition can be framed as an "emergency" to accelerate logging. Such a move represents a major policy shift, away from science-based forest management with public accountability, and toward deregulated, industrial-scale extraction. It effectively throws decades of environmental protection out the window, while signaling that timber targets take precedence over ecological integrity and public

involvement.

I urge the Forest Service to withdraw the emergency designation and undertake full NEPA analysis, including alternatives and public participation. At a minimum, the agency must exclude mature and old forests, large trees, riparian areas, and steep slopes from treatment, and recognize that insects and disease are natural processes exacerbated by climate change[mdash]not symptoms to be "cured" by logging. The responsible path forward is to reaffirm commitments to ecological integrity, enforceable standards, and transparent public engagement.

Respectfully,
Paul Hamilton-Pennell
Owner & representative writing on behalf of Alembic Enterprises

Cited References:

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* Law, B.E. et al. 2018. Land Use Strategies to Mitigate Climate Change.
* Mildrexler, D. et al. 2020. Large Trees Dominate Carbon Storage in Forests.
* Moris, J. et al. 2022. Rocky Mountain Research Station Report.