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Comments: I appreciate the opportunity afforded by the National Environmental Policy Act (NEPA) to provide the U.S. Forest Service with input on the Austin timber sale in the Malheur National Forest. I am a wildlife biologist with expertise in wildlife biology, ecology, and behavior. I hold a degree in Biology from Duke University (1992); an M.Sc. degree in Wildlife Science from the Oregon State University (1998); and a Ph.D. in Ecology from the University of Zurich (2020). I also have 25 years of research experience focused on the interactions between wildlife and wildfire in western U.S. forests and published more than a dozen peer-reviewed studies on this topic.

There remains a deficit of large trees on the landscape in eastern Oregon. The 21-inch Wildlife Screens are critical to protect forest health and resilience, and I strongly oppose the removal of the wildlife screens under emergency authority. I also oppose the proposed site-specific forest plan amendments that increase the density of roads (extremely damaging to the forest environment), degrade priority Wildlife Connectivity Areas between old forests, and reduce elk tree cover. Furthermore, the Austin sale area coincides with the "humongous fungus", one of the largest single living organisms, by biomass, on the planet. I strongly oppose logging in any areas that host this fungus, as such logging compacts and degrades soils, and damages sensitive fungal networks as well as water storage in soils.

In brief, my main concerns are (1) Large trees are critical habitat for rare native wildlife;(2) Logging large trees releases significant and dangerous amounts of carbon into the atmosphere, worsening climate change; and (3) Logging may eliminate trees that are most adapted to survive drought and insect attacks in a warmer, drier climate, thus harming forest resilience. I strongly urge the Forest Service to retain the 21-inch diameter Wildlife Screens in eastern Oregon.

(1) Large Trees Are Critical For Wildlife: It is well-documented in the scientific literature that large trees play a critical role in the ecosystems in which they occur. In forests east of the Cascade Mountains of the western US, large trees provide vital habitat for rare wildlife species such as Pileated Woodpeckers and American martens, which select larger-sized trees to meet their life-history needs.

(2) Large Trees Store Carbon Whereas Logging Releases Carbon: Large trees also store vast amounts of carbon, together with forest soils, so that timber harvesting which removes large trees and disturbs forests soils is one of the greatest sources of human-caused release of greenhouse gas emissions into the atmosphere.

3) Logging Trees Harms Forest Resilience and Tree Evolution: Harvesting timber to reduce fire severity or insect attacks or mortality from drought is counter-productive because this could be eliminating the very trees that are most genetically resistant to disturbances associated with a warmer, drier climate. As an example, a study conducted in Montana found that survivorship of individual trees during mountain pine beetle outbreaks is genetically based and therefore heritable. The authors stated "the insect outbreak acts as a natural selection event, removing trees most susceptible to the bark beetle and least adapted to warmer, drier conditions." Logging trees is likely tampering with the evolutionary trajectory of forests and their capacity to adapt to changing conditions. When the Forest Service conducts timber harvesting in forests, there are genetic consequences that are not considered, which could be devastating for forest resilience in a warming world.

The Draft Environmental Impact Statement does not sufficiently analyze the potential for significant negative impacts of the Austin sale, which includes a 78,200-acre planning area with more than 35,000 acres of commercial logging. There is no emergency, this is a massive and fragile area that provides many benefits to people and wildlife, and it is imperative for the Forest Service to complete a full public process including objections and appropriate consultation.

Thank you again for the opportunity to provide comments. I attended Oregon State University for my Master's degree, and lived in Oregon (Portland, Corvallis, and Sisters) for many years. I visited the Malheur National Forest many times for recreational and scientific purposes and I plan to return.