May 11th, 2021

RE: Climate and forest carbon in Eastern Oregon

Dear Ms. McCarthy,

We undersigned organizations respectfully request that you review the Trump-era decision to roll back protections for large trees on National Forests in Eastern Oregon and Southeastern Washington. We believe that a review of this decision, and the reinstatement of protections for large and old trees, is warranted under President Biden's Climate EO 13990.

In the final days of the Trump administration, James Hubbard, a Trump appointee, signed the decision to undo key protections for large trees on more than eight million acres across six National Forests. This recent Forest Plan Amendment, *Forest Management Direction for Large Diameter Trees in Eastern Oregon and Southeastern Washington*, rolled back bedrock protections for large and old trees under the rule known as the Eastside Screens.

Due to a century of high-grade logging that removed the largest and oldest trees across all forest types, only a small fraction of the old growth trees that historically comprised forests in eastern Oregon and southeastern Washington now remain.[1] The Eastside Screens were implemented in 1994 in order to preserve the remaining large and old trees, and to protect ecosystem values such as wildlife and streams habitats.[2] Protections have not been in place long enough for large and old trees, and the crucial wildlife habitat they provide, to recover.[3]

If adequately protected, large and old trees on federal public lands provide an irreplaceable, effective, and low-cost opportunity for storing massive amounts of carbon.[4] Large trees play an outsized role in carbon storage, and so their protection is critical for meeting climate goals and making meaningful strides towards combating climate change. **Recent research found that large trees comprise only 3% of trees, yet account for 42% of the above-ground carbon in forests in this region**.[5] In addition to storing the lion's share of above-ground forest carbon, large trees sequester carbon at a faster rate than smaller trees. Notably, old and mature forests store more carbon than younger, logged forests.[6] Researchers estimate that allowing mature forests to grow and stopping deforestation could double carbon uptake.[7] Logging is the largest source of carbon emissions in Oregon, and emits far more carbon than wildfires.[8]

Retaining the remaining large trees on the landscape is crucial to providing for climate adaptability, and for protecting and restoring forest ecosystems. Large trees are the foundations of old growth and mature forests, and their roles in supporting biodiversity, wildlife, and clean water cannot be overstated. In addition, older forests and mature trees are better equipped to adapt to climate change and climate variability than younger forests.[9] Old and mature forests protected from logging tend to experience lower severity wildfires compared to younger intensively managed forests.[10]

Over 100 independent scientists said this Forest Plan amendment will worsen the climate crisis, and advocated in favor of retaining protections for large trees. Former Forest Service leadership spoke out against the amendment. The amendment will result in irreversible losses of the remaining old and large trees, increased carbon emissions, and potentially devastating impacts to wildlife and water quality. Yet, under pressure from the Trump administration, the Forest Service determined that their decision to withdraw key protections for large trees—a decision that affects approximately 12,500 square miles (eight million acres) across six National Forests—will not have significant effects.

We believe that the Trump administration's decision to remove key protections for large trees across millions of acres of National Forests falls squarely within the bounds of a 'significant' decision, and should therefore fall within the guidelines for decisions eligible for review under President Biden's

Climate EO 13990. Additionally, the EO outlines goals which include sequestering carbon in trees, protecting biodiversity, and addressing the changing climate in forests. The Trump administration's amendment runs counter to these goals and pushes federal public forests in the opposite direction of the vision outlined within the EO.

It is also important to note that the Forest Service's process for adopting this Forest Plan amendment was flawed and inadequate resulting in numerous substantive and procedural violations of applicable environmental laws, including but not limited to the National Environmental Policy Act. Notably, the public process for the amendment took place entirely during the pandemic, with only one opportunity for comment. The circumvention of the public process for such an enormous and consequential decision severely damaged the public's trust, and suggests that the agency lacks confidence that their decision can withstand independent review or public scrutiny.

Dozens of conservation, climate, Indigenous, wildlife, and other organizations called upon President Biden's transition team to stop this amendment, and instead prioritize carbon storage and biodiversity. Conservation groups also requested that the Biden administration review this decision under the Climate EO. We have not yet received a response to our requests.

Reinstating protections for large and old trees would allow communities and stakeholders to work together on forward-thinking solutions to the ongoing climate and biodiversity crises. President Biden's climate EO provides exciting frameworks for this work to take place-- provided we do not allow bad Trump administration decisions to tie us to actions that will worsen the climate crisis and cause irreversible harm to our public lands.

Thank you for your attention to this matter. It's hard to overstate the consequential nature of this proposal on the diverse forests in Eastern Oregon. The enormity of this amendment--and its massive implications for carbon storage, climate change, and forest ecosystems--surely calls for review under President Biden's climate EO. We implore you not to overlook the urgently needed review of this decision.

Sincerely,

Paula Hood, Co-Director
Blue Mountains Biodiversity Project

Sean Stevens, Executive Director
Oregon Wild

Darilyn Perry Brown, Executive Director
Greater Hells Canyon Council

Ben Gordon, Executive Director
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Mathieu Federspiel, Chair
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Chris Krump, Public Lands Guardian
WildEarth Guardians

Amy Stuart, Leadership Team
Central Oregon Bitterbrush Broads
Great Old Broads for Wilderness

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