

# WORTHY GARDEN CLUB

Our mission is to connect people to the natural world and cultivate a community of environmental stewards working together to build a greener and healthier planet through advocacy, action, and education.

**"UNLESS someone like you cares a whole awful lot, nothing is going to get better. It's not."  
Dr. Seuss, [The Lorax](#)**

The Worthy Garden Club has been actively working to protect and improve the conditions of Oregon's forests for years. For example, our Operation Appleseed project donated over one million dollars to plant one million trees in three years on public lands affected through catastrophic wildfire across Oregon. We are also supporting and collaborating with scientists and researchers at Oregon State University and the University of Oregon looking at carbon capture and storage, biodiversity, and a myriad of other forest management issues across the West. We are staunch advocates for incorporating the latest science in decision making and adaptive management.

Our forests need protection. Carbon capture in large diameter trees has a significant beneficial impact on global climate change. Biodiversity contributes to healthy and resilient forests that provide a wide array of benefits for humans and other creatures. This is true both locally, regionally, and globally.

While our work and the research we support has identified the critical importance of saving forests for the survival of our own species, government agencies and many of our elected officials have failed to prudently steward our forest public forest trust. Instead, during a climate emergency, they have deferred to the special interests of logging contractors and timber companies. Put simply, this is not right.



The decision to log mature ponderosas near Pine Drops bike trail is a flash point. We can no longer trust our local representatives to speak for us, or the trees. We can no longer assume that our elected leaders care "a whole awful lot." We need to stand up for what we know in our hearts is just and from the science is fair and honest. When it comes to protecting our common resources, like the forest, elected officials must be held to the standard of care and duty of loyalty like a trustee managing a bank account. The alternative is waste, plunder, corruption and failure: not only for us, but for the entire planet. That's as unacceptable as it is preventable.

Attached is some information that went out to our elected officials, and some opinion pieces submitted by other people and organizations working to protect our public lands. This is good information to have on hand when talking with local officials about the prudent management of *your* forest, wildlife, air and water.

Check this page shortly. We are working with local conservation groups to propose a resolution before the City of Bend, Deschutes County, and the US Forest Service, that would require elected officials to hold a public hearing, collect comments, review the latest science, consider all tree-sparing alternatives and hold a vote before taking unilateral action to cut mature trees on public lands. We must not become numb to unwise executive actions.

Contact Rick Martinson, Worthy Garden Club Executive Director at [Rick@worthygardenclub.com](mailto:Rick@worthygardenclub.com) or Roger Worthington, President of the Worthy Garden Club @ [Roger@worthybrewingco.com](mailto:Roger@worthybrewingco.com) to talk more about how you can get involved in the efforts to protect our world.

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### What did we learn from the 2020 and 2021 wildfires? Ralph Bloemers, Esq., Crag Law Center

The 2021 fires broke barriers in recent fire history. The 2021 Dixie fire became California’s largest fire and the first in recent history to cross the Sierra Nevada crest to the east. In August, the Caldor fire also spread east across the Sierra Nevada crest. In Oregon, the Bootleg fire became an intense fire that spread rapidly in heavily managed, relatively flat, tree plantations, unusual for an early July fire. The December 30<sup>th</sup> front range urban interface Marshall fire destroyed the largest number of structures in a Colorado fire.

**Were these fires unusual?** No, they were a continuation of recent fire history. For proof, all we have to do is look at the 2020 Oregon Labor Day fires for similar, wind driven, drought influenced fires that burned through forests and communities (Beachie Creek), tree plantations (Holiday Farm), urban areas (Almeda), coastal communities (Echo Mountain).



**What did these fires have in common?** There were periods of extreme fire behavior with rapid fire spread. The fire intensity was driven by wind and very dry fuel. The winds were to be expected, even the very high winds of December 30<sup>th</sup>, which while uncommon, were not unusual for the front range of Colorado in winter. The fires skipped over treated areas, fuel breaks, roads, and spotted long distances.

**What was significant?** Drought. NE California, SE Oregon, and the central front range of Colorado were all in drought when the fires occurred. The type of drought that affects dead fuel moisture, life fuel moisture, and soil moisture. The lack of that moisture changed the fire dynamics

of the fuels, leading to increased fire intensity (energy release) and increased ignition from wind borne embers (spotting). Many fires were ignited by live power lines.

**What about forest and fuel management?** Given that fuel is the only aspect of the fire triangle people have any ability to influence, there has been a continuing focus on and ramp up in efforts to manage the amount of fuel in forests as a means to prevent these types of fires. If one looks at these fires it is clear that during periods of extreme fire behavior in high wind conditions, thinned forest plantations, prescribed burned areas, fuel breaks, dirt roads, city streets, paved multilane highways, and the barren crest of the Sierra Nevada did not keep fire from spreading, long range spotting or igniting receptive fuels. All it took was an ornamental shrub in a yard in Superior, Colorado to generate enough embers to burn down a community.

**Can thinning have an effect?** It depends. Understory thinning of shrubs, saplings, and the lower limbs of large trees can help prepare the ground surface for the safe and controlled reintroduction of fire. But this kind of understory thinning more resembles cutting or pruning--not removal of trees--and it must be followed by pile and broadcast burning of the ground surface where dead limbs and needles accumulate. These surface and understory fuels need to be recycled into soil nutrients for new plants and carbon cycling in the soil, and fire is the most effective, economical, and natural method for targeting those fuels and vegetation. Without some burning, thinning alone is a half-completed fuels treatment.

#### **What about the impacts of firefighting?**

The fire suppression efforts were extensive and heavily reported on. Thousands of firefighters and hundreds of fire engines were utilized along with helicopter and airplane water-retardant drops. Heavy equipment such as bulldozers, masticators, and fellers created fire breaks. Back fires, many times producing severe fire damage, were set. These suppression efforts were often futile and caused more lasting damage than the fire that passed through, a subject that has, for the most part, escaped intense reporting.



**Is the fire suppression money well spent?** The fire suppression efforts were very expensive. One of the justifications for firefighting is preserving the value of structures, including houses, at risk. When one examines the fires, one can see structures that survived due to ‘home hardening’ practices and vegetation management immediately around the imperiled structure. Home hardening is a proven, cost-effective and focused means of fire protection.

**The end result.** The changing climate has led to a changed fire regime, increasing the periods when fires will burn. The 2021 late June ‘heat dome’ above the Pacific Northwest, brought record high temperatures to Oregon, Washington, and British Columbia. That event further affected the drought impacted down and dead fuels, vegetation, and soils. The Colorado front range drought

brought decreased late summer rain and an absence of early winter snow leaving the cured grasses dry available to burn, conditions that enhanced initial fire spread. The big fires of 2020 and 2021 were ‘controlled’ when the weather conditions changed.

**What can change the outcome in future years?** Due to these fire regime changes being climate driven the most effective choice for changing outcomes is to invest in decreasing total carbon emissions, especially those from fossil fuels. Every other choice, including carbon offset and carbon neutral, is putting a band-aid on a symptom.

**Confronting misleading language.** 2021 further laid bare that the language used in the discussions of fire policy continued to be misleading. ‘Wildland fire season’ has exceeded its useful life, for there is no longer a season for these fires and the fires are not confined to the wild lands (Almeda, Marshall fires). A distinction should be made between ‘forest’ and the heavily managed timberlands that are ‘tree plantations’. Many forests have evolved with fire, while tree plantations are an artificially produced fuel matrix that has a propensity to burn like a field of stacked pallets. The term ‘carbon offset’ when applied to timber stands has been exposed as an accounting hoax of using potential temporary carbon storage to mitigate the use of millions of years old fossil fuel. ‘Biomass utilization’ is a cover term for carbon extraction, which ignores that material left on site contributes to the health of the soil, vegetation and watershed.

**Key Takeaways.** Recent fires and careful study have led experts within the Forest Service to question the strategy of ramping up of the same old approach - thin forests so they burn less hot. Scientists, researchers, and front-line firefighters and fire lighters are questioning the old approaches and advocating that we prioritize work from the home outward. We have seen that the unusual has become common. We have seen that power companies continue to ignite fires in extreme conditions. We have learned that most fires are started on private lands, contrary to the narrative that the problem is primarily on federal lands. We have seen how home hardening can keep homes from burning in extreme conditions.

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Photo: Daniel Howland

# PROTECT OREGON'S BIGGEST TREES

## OUR FORESTS ARE AT RISK

In 2020, the Trump Administration and the Forest Service (USFS) rushed through a proposal to eliminate the Eastside Screens and remove protections for big and old trees in Central and Eastern Oregon.

This decision was the result of a coordinated and politically motivated effort that bypassed the potential for meaningful public comment and scientific inquiry on over 9 million acres of public lands.

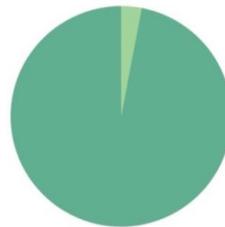
## STAND UP FOR BIG TREES

For over two decades, the Eastside Screens provided the foundational protections for old-growth trees in Central and Eastern Oregon National Forests.

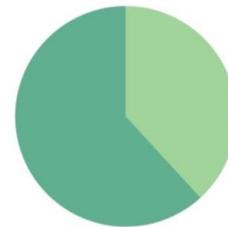
We need to stand up for science and the climate and ask that Oregon's elected leaders work with the Biden administration to keep protections for large trees and old-growth forests.

As Oregonians, we have a long history of defending large trees and old-growth forests on our public lands.

It's time to stand up for our forests again.



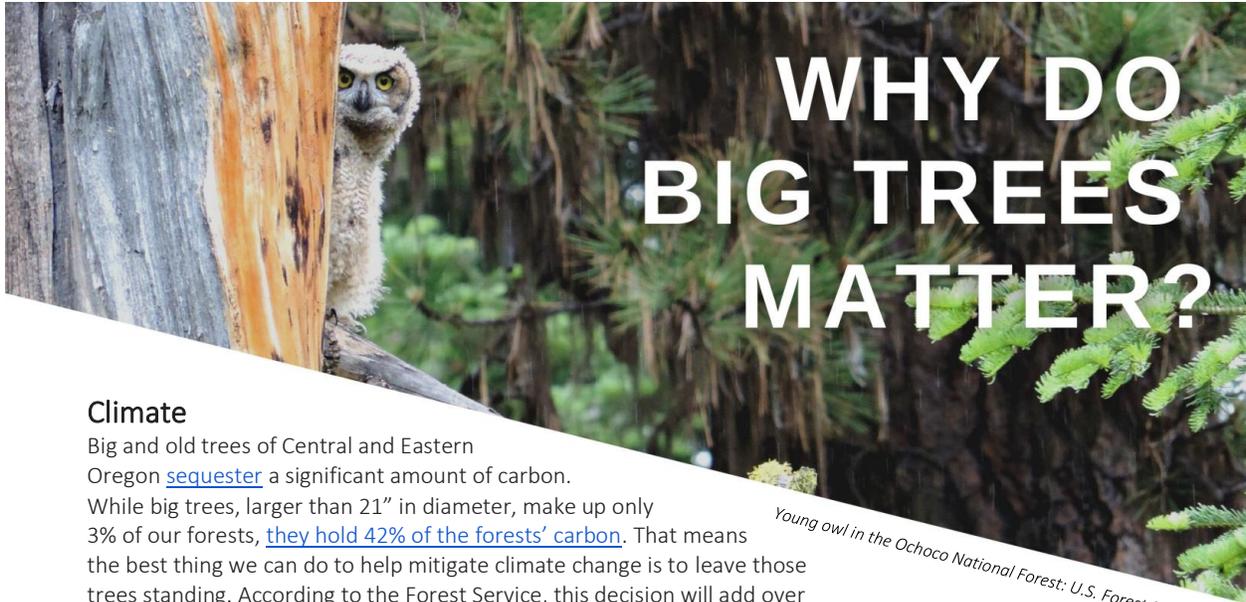
3%  
TREES



42%  
CARBON

Central and Eastern Oregon's biggest and oldest trees make up only 3% of our forests. Yet, the old growth that remains stores 42% of forest carbon, provides critical habitat for wildlife, and is resilient to wildfire.

That is why we've had the Eastside Screens, a decades-old federal policy to protect the 3% of our biggest and oldest trees from logging.



# WHY DO BIG TREES MATTER?

*Young owl in the Ochoco National Forest: U.S. Forest Service*

## Climate

Big and old trees of Central and Eastern Oregon [sequester](#) a significant amount of carbon. While big trees, larger than 21" in diameter, make up only 3% of our forests, [they hold 42% of the forests' carbon](#). That means the best thing we can do to help mitigate climate change is to leave those trees standing. According to the Forest Service, this decision will add over 1.5 million tons of carbon to the atmosphere and could be significantly higher.

## Wildlife

The Eastside Screens were initially put in place to protect wildlife as old-growth-dependent species were in rapid decline. When the decision was made to remove protections, little research or attention was given to the effects on wildlife that call these forests home. Large, old trees are important sources for species recolonization of disturbed areas, as they have more intact ecological processes (e.g., nutrient cycling, hydrologic and fire regimes) and complex structural attributes (e.g., snags, down logs) that support biodiversity. Our large trees that remain provide [critical habitats for our wildlife](#); the pygmy nuthatch, white-headed woodpecker, pileated woodpecker, Pine marten, fisher, several species of owls, hawks, songbirds, bats, [and many more](#) rely on these trees as critical habitat. Regional species like mule deer and elk rely on protected forested areas for winter and summer rangeland.

## Recreation

Oregon's National Forests east of the Cascade Range include the Ochoco, Malheur, Umatilla, Wallowa-Whitman, Fremont-Winema, and Deschutes. These forests provide awe-inspiring recreation opportunities and access to open space, including hiking, biking, birding, fishing, foraging, and hunting. Wildlife-related recreation supports Oregon's rural [economies](#) and brings [benefits to health and well-being](#) for all Oregonians and visitors.

## Wildfire

The Eastside Screens were meant to protect the remaining 3% of our biggest and oldest trees. These are the trees that have survived decades of fire and are naturally resistant to future wildfire. Their roots hold moisture in the soil and keep forest temperatures down, giving us a template for how to live alongside a fire-adapted ecosystem.

## Conservation Perspectives

The biggest trees that remain in the Pacific Northwest support a [diverse and resilient ecosystem](#), with centuries-old trees that pass on the genetic history of the landscape to new seedlings. The Trump administration's decision to remove protections on over 9 million acres of public lands went against the scientifically-based position of [over 115 independent scientists](#), along with dozens of conservation, climate, indigenous, and other organizations. Interested in finding out more? Check out these [frequently asked questions](#) to learn more about Central and Eastern Oregon's biggest trees.

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## **Mature & Old Trees in Eastern Oregon Forests - 21 inch rule**

**Context:** At a time when scientists and policymakers alike are advocating for the protection of mature and old trees, wildlife and water on our public lands, the Biden Administration has been saddled with a rule promulgated by a Trump appointee days before the end of his Presidency.

The rule eliminates the protection for mature and older trees on over 14,000 square miles of the Fremont Winema, Deschutes, Ochoco, Malheur, Umatilla, and Wallowa Whitman National Forests. This is 2/3 of the state of Oregon, and it is important to note these are not just dry pine forests. These lands have extensive moist mixed conifer forests that you might mistake for the coast range if you were led there blindfolded.

The forests with mature and larger trees have high levels of biodiversity, store more water, and have significant cultural importance to the Nez Perce tribe (Contacts: David Mildrexler, Angela Sondena)

Efforts to thin these landscapes to reduce fire risk are being questioned by top scientists and will result in more carbon loss than fire itself, degrade water and biodiversity. (Synthesis - Dr. Law, forthcoming)

**Money Flowing In:** Large sums of money are flowing to the Forest Service for forest management and the expectation is that there will be a ramp up in thinning for fire risk reduction consistent with the Wildfire Crisis Strategy. The agency is doing less public process and scientific review, and increasingly devolving control to collaborative groups dominated by industry representatives and local politicians.

**Litigation on the Horizon:** the Forest Service is already proposing and planning backcountry logging of large trees on a significant scale from the Fremont Winema (South Warner Project) to the Umatilla National Forest (Ellis Project) to the doorstep of the Eagle Cap Wilderness and in the Hells Canyon National Recreation Area (Morgan Nesbitt Project). The elimination of the protection for trees 21 inches diameter at breast height was to allow for larger Grand firs to be cut to pay for the “restoration”.



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## Wildlife

**3 new policies added** **2 proposed**

Status of Trump's rollbacks: **7 overturned**

**12 targeted** **11 not yet targeted**

One of the hallmarks of former interior secretary David Bernhardt's legacy has been the narrowing of safeguards for endangered wildlife. The northern spotted owl, whose forest habitat is disappearing; the Pacific walrus, which faces shrinking sea ice; and the Bryde's whale, threatened by oil and gas drilling in the Gulf of Mexico, are likely to receive enhanced protections under Biden.

making critical habitat designations. [Read more »](#)

### Scaling back sage grouse habitat protections

Trump sued

The Bureau of Land Management published a notice saying it would reconsider the Trump administration's management plans to withdraw sage grouse protections spanning 10 million acres to allow drilling. [Read more »](#)

### Easing salmon and smelt protections

Trump sued

Relaxed environmental protections for salmon and smelt in California's Central Valley. [Read more »](#)

### Changing Endangered Species Act consultations

Scaled back consultations under the Endangered Species Act. [Read more »](#)

### Logging large Trees in eastern Oregon and Washington

Reversed a 25-year policy of barring the logging of trees with a diameter of 21 inches or more in national forests in eastern Oregon and Washington. [Read more »](#)

# WHAT CAN 3 TREES DO?

**LARGE TREES, OVER 21" IN DIAMETER, MAKE UP ONLY 3% OF OUR FORESTS.**

- STORE CARBON**  
42% of the carbon held in forests is stored in large trees.
- FOSTER FIRE RESILIENCE**  
Large trees with thick, fire-resistant bark keep temperatures cooler and groundwater levels higher, preventing fire ignition and spread.
- PROVIDE SHADE**  
Create microclimates—dense canopies keep forest floors cool. Without large trees, soil dries out and makes it hard for seedlings to grow.
- MAKE US HAPPY**  
Large trees create natural spaces for enjoyment and actually reduce stress!
- HOMES FOR ANIMALS**  
Large trees, snags, and hollows create protected habitat for a wide range of animals.
- PROTECT WATER**  
Protect water—dense forests hold groundwater, provide shade that prevents evaporation, and improve nearby streamflows.
- RESIST DROUGHT**  
Expansive root systems mean large trees reach deeper into the ground for water supplies, and can better survive drought.
- PROTECT SOIL**  
Massive root systems hold soil, stabilize slopes, and prevent erosion. This, in turn, prevents flooding.

Based on a 2020 study of Washington and Oregon forests east of the Cascades, "Large Trees Dominate Carbon Storage in Forests East of the Cascade Crest in the United States Pacific Northwest" by Midgester DJ, Warner LT, Law BE, Birdsey RA, and Bloomer WS, Frontiers for Forests and Global Change 2:504224

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After multiple conversations, we sent the letter below to Mayor Sally Russell, County Commissioner Phil Chang, Forest Supervisor Hollyl Jewkes, and a number of other recipients on March 24, 2022. We asked our elected stewards to hit the pause button before making an irreversible decision that would result in irreparable harm. We e-mailed the letter on a Thursday, without reply, and trees were cut on the weekend.

March 24, 2022

Via Regular U.S. Mail and E-Mail ([srussell@bendoregon.gov](mailto:srussell@bendoregon.gov))

Mayor Sally Russell  
City Council Chambers at City Hall  
710 NW Wall St.  
Bend, OR 97701

**Re: West Bend Project: Hit the Pause Button, Save Mature Ponderosas**

Dear Mayor Russell:

Thank you so much for talking to me about the West End Project. I appreciate your willingness to include the Worthy Garden Club in the ongoing discussions and set up a time to talk. We have only recently been apprised of the controversy through the vigilant efforts of local conservation groups. I am hopeful that we can undertake this vital conversation *before* the trees in question are cut down.

Before delving into the substantive arguments, we have three questions:

1. Is there a date and time set for the logging of the mature Ponderosa Pines at issue? Who gets to decide the precise timing? Can the date and the scope of the cutting, which will cause irreparable harm to the trees in question, be delayed? I understand from you that the decision is in the hands of the logging contractor, and that they in their discretion, can power up the chain saws at any time.
2. Is cutting the trees in question consistent with the letter and spirit of the logging contract, which we assume is consistent with the Final Record of Decision (see below)? We have not seen the contract. Can you provide same?
3. What is the driving motivation for cutting the trees in question? Is it fire suppression? Forest and biodiversity restoration? Or the commercial interests of a logging contractor and their timber buyer? Do their interests preempt the needs of the public?

Our pressing concern is the immediate fate of the Ponderosas. We understand that there have been allegations by the logging contractor of vandalism. We understand that as a result the contractor

has turned down fair offers to buy the trees in question and barrel forward. We have no knowledge of any alleged facts supporting any claim of vandalism. We are concerned that the contractor will use this alleged vandalism charge as political cover to justify a rash decision to sever the trees as “retaliation.” It would undermine the spirit of the collaboration paradigm to leave the final decision on when, what, and where to cut mature trees on public lands to the whims of a disgruntled contractor and a for-profit timber company.

We would like to buy time so that we can discuss with the decision makers the merits of executing on a decision made roughly 11 years ago. Material conditions have changed. The average temperatures have increased, the GHG levels have increased, the drought has gotten worse, the carbon sequestering forest cover has gotten smaller, and natural habitat as well as biodiversity has also shrunk. The science behind wildfire suppression has also changed dramatically.

In short, we are in a climate emergency. In order to mitigate its devastating consequences, and reduce emissions, and draw down carbon by 2030 and 2050, curbing logging operations and preserving stands of mature national forest is more critical than ever.

### The Controversy

At issue is the wisdom of removing mature ponderosa pines in a ~10 acre section of the 25,700 acre West Bend Project. The WBP is within the Deschutes National Forest, approximately ten miles from the nearest housing development. The primary goal of the WBP is the restoration of the “forest landscape toward more resilient historic conditions.” (USFS West Bend Scoping Letter, December 2010). The Scoping Letter describes a need to return the forest to structures and conditions that lie within the historic range of variability – an ecological term used to describe the natural change or variability in plant associations over time.

The location of the mature ponderosa under question is within the Community Wildfire Protection Plan Area (WPPA). WPPA’s are designated by Project Wildfire (authorized through the Congressional Healthy Forest Restoration Act of 2003) to facilitate *collaboration* between communities and state and local agencies to determine priorities for hazardous fuels projects on federal and private lands in the wildland-urban interface (WUI). In short, actions taken pursuant to this Act must be shown by scientific data to reduce *not* increase the risk of wildfires.

Four major plant associations are identified in the 2010 Forest Service scoping letter: Lower Elevation Ponderosa Pine, Mid-Elevation Ponderosa Pine and Mixed Conifer (dry), Mixed Conifer, and Lodgepole Pine. The ~10 acre plot is located within the Lower Elevation Ponderosa Pine group. Management treatments for the low and mid-elevation sites prioritizes “*favoring fire-resistant species ... and retaining large diameter ponderosa pine.*” (See Table 1, emphasis added). This raises the question whether the logging contract is consistent with the law.

In 1994, the USDA Forest Service Pacific Northwest Region (PNW) enacted the 21-inch rule to slow the loss of large, older trees and old forest patches in national forests east of the Cascade Mountains in Oregon and Washington (USDA Forest Service, 1995). This “rule” set a broadly accepted definition for mature or large trees. The rule has been used as a common threshold in studies on carbon storage and biodiversity values of forests. The rule was initially conceived to protect late successional and old-growth forests and the native species that depend on these unique

ecosystems east of the Cascades Crest (Henjum et al., 1994). And although there have been site-specific exceptions, the 21-inch rule has prevented large-scale harvest of trees  $\geq 21$  inch diameter (DBH) (Mildrexler et al., 2020).

The project location is outside the Bend city limits, but within the city limits the Tree Preservation Performance Standards (16.10.100) require that all trees with a diameter at breast height (DBH) of twelve (12) inches or larger be retained on site, and 50% of all trees between eight (8) and twelve (12) inches DBH “shall” be retained on site. This standard suggests a high social value of mature and large trees to the citizens of Bend and central Oregon. The tract within the Phil’s trail network may not legally be inside the city limits, but the city as a stakeholder in the collaboration should take a position on protecting larger trees that is consistent with its own standards.



*Ponderosa pine in question*

As you can see from a photo recently taken of a few of the Ponderosa pines slated for cutting, many of the mature trees within this stand exceed 21 inches.

The original scoping for the West Bend Project was completed in 2011. The Final Record of Decision (ROD) for the West Bend Vegetation Management Project and Forest Plan Amendments was published in the Federal Register in December 2013. The analysis was based on the best available science at the time, but more recent studies have disproven many of the assumptions used in the analysis.<sup>1</sup>

Plainly stated, science has marched onward, making the original good faith analysis outdated. This progress compels us to revisit the merits of the decision and terms of the logging contract to reflect our current understanding of forest function, including wildfire suppression. 36 CFR 220.3 directs the responsible official to facilitate management changes in response to recent studies findings related to climate change, forest resiliency, and carbon storage.

### **New Scientific Analysis and Data Shows Many Current US Forest Management Practices Worsen Climate Change and Increase Fire Risk and Severity**

<sup>1</sup> The law requires that actions be taken that are consistent with the best available science. 36 CFR 220.3 defines Adaptive Management as “a system of management practices based on clearly identified intended outcomes and monitoring to determine if management actions are meeting those outcomes; and, if not, to facilitate management changes that will best ensure that those outcomes are met or re-evaluated. Adaptive management stems from the recognition that knowledge about natural resource systems is sometimes uncertain.” Additionally, § 220.4 directs the responsible official to determine and document that the environmental effects resulting from implementation of the new proposed action are similar to those analyzed in the existing NEPA documents. (It is certainly arguable that the environmental impacts of implementing the proposed action exceeds any potential benefits analyzed in the EIS.

The rationale for harvesting mature trees is based on the use of historical stand structure and species composition as management targets. These premises assume that removing large shade-tolerant species will promote resilience to future drought and disturbance. However, ongoing climate change and other stressors such as habitat fragmentation, hot winds and loss of biodiversity raise concerns over the use of historical conditions as management targets (Mildrexler, Berner et al. 2020).

1. Large trees (DBH  $\geq$  21 in) make up only about 4% of the total stem counts in six eastside forests (Figure 1) but store approximately 46% of the above-ground carbon (AGC). See Table No. 2.
2. From a climate change/carbon storage perspective, it would take approximately **310 years** to reach maximum biomass (and carbon storage capacity) in the East Cascades ecoregion after harvest of large trees, which is too long to help reach climate mitigation targets set by Executive Orders and applicable laws. (Hudiberg, Law et al. 2009).
3. Forest canopies of the PNW buffer extremes of maximum temperature and vapor pressure deficit, with biologically beneficial consequences (Davis, Dobrowski et al. 2019). Water availability and microclimatic buffering are also enhanced by larger trees and intact forests (Frey, Hadley et al. 2016, Buotte, Law et al. 2020). Removal of bigger trees quickly leads to a large increase in soil and canopy heating, which increases enough to negatively impact photosynthesis (Kim, Still et al. 2016), seedling survival, and regeneration (Kolb and Robberecht 1996, Davis, Dobrowski et al. 2019b).
4. Older forests experience lower fire-severity compared with younger, intensively managed forests, even during extreme weather conditions (Zald and Dunn 2018).
5. Mature and old forests store more carbon in trees and soil than young forests. Converting mature forests to younger forests results in a significant loss of total carbon stores (Hudiberg, Law et al. 2009).
6. The strategy for reducing the severity of wildfires is focused on thinning public lands to prevent wildfire intrusion into communities, even though over 60% of fires in urban-interface properties start on private land and move to public forests (Law, personal communication).
7. Many commercial logging projects on public lands are conducted in the name of “fire prevention” but, due to the conflicting interest of timber revenue, result in the removal of large and medium fire-resistance trees, which degrades forest resiliency and results in more carbon emissions than a natural wildfire of the same size (Krop 2020). Logging itself is a major contributor of GHG.
8. The period that includes the late 19th and early 20th century is often the reference for studies that document historical conditions in ponderosa pine forests, but this was one of the coolest and wettest periods in at least three centuries. This pluvial was followed by the dust bowl drought (1917–1936) that was the most severe and sustained drought in at least 690 years. Dendrochronological and instrumental records indicate that the 1917–1936 drought has since been exceeded by the 1990-present drought (Merschel, Beedlow et al. 2021)
9. Ponderosa pine owes its longevity to drought tolerance and early and continuous investment in defensive mechanisms, including phenolic compounds and resins, deep roots, fire-resistant bark, and sparsely branched tree crowns.

10. Implementing multiple risk-based strategies may depend on adopting an alternative fire management approach. (Dunn, O’conner et al. 2020).
11. “The Forest Service’s new strategy for the wildfire crisis leads with a focus on thinning public lands to prevent wildfire intrusion into communities, which is not fully supported by our work, or the work of many other scientists, as the best way to mitigate community risk.” Dunn, 2022, <https://today.oregonstate.edu/news/osu-research-suggests-forest-service-lands-not-main-source-wildfires-affecting-communities>. “A substantial portion of the wildfire problem is a community destruction problem,” added Michael Caggiano of Colorado State. “The Forest Service can contribute to an advisory or facilitation role to address the home ignition zone, including fire resistant design and zoning, and fuels management on private lands, but states, local government and homeowners are better positioned than the USFS to manage those components of wildfire risk.”
12. The best science is telling us to work on removing combustible wood debris from the home out, not the forest in.

In summary, many of the existing forest management practices allegedly to protect forests and homes from wildfire are having severe adverse effects on forest integrity, and resilience and are worsening climate change and diminishing biodiversity.

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## Conclusion

During a climate emergency, the last thing we want to do is accelerate that catastrophe. Cutting down fire resilient, mature Ponderosas on public lands more than 2 miles from the Skyliners Neighborhood and 8 miles from the Highlands and Tree Farm developments based on outmoded science will *not* measurably reduce wildfire risk. Nor will cutting these trees down enhance the health of the forest ecosystem. But severing mature trees certainly *will* contribute to accelerated global warming. Worse, it will only feed the growing pessimism that our elected public officials, who are supposed to be the wise stewards of our forests, are either out of touch or subservient to corporate interests.

We are not simply speaking for the trees, which have no voice. We are also speaking for ourselves – humans. By cutting these trees down, we are sawing the branch of the tree we are sitting on. As the trees go, so do we. We are asking you to slow down this irreparable harm. Allow an assessment of new data that has emerged in the last 11 years. Allow new stakeholders with wide ranging perspectives to review the costs and benefits of the West Bend Project. Evaluate alternatives that spare the mature trees while also compensating the contractor for any provable economic loss. Open up the decision-making process to the public in a forum that is accessible to all. Embrace the new science and new forest suppression paradigms. Avoid the appearance of a “done deal” that’s “jammed through” at the public’s expense.

Thousands of people every year hike and ride bikes through and around this ten-acre section within the iconic and beloved Phil’s Trail networks. If we move forward rashly and put the fate of these beautiful trees in the hands of a miffed private contractor, while the science shows that cutting them down actually increases the fire risk and contributes to global warming, then that barren ten-

acre lot will serve as a daily and depressing reminder that we *could* have done the right thing but chose in our haste to do the demonstrably *wrong* thing.

Finally, we thank you for accepting our offer to meet and confer. We would like to do that, along with other stakeholders, *before* the decapitation. We don't want to conduct a *post mortem* at which we gnash our teeth and lament over what could and should have been done if we had allowed cool reason to prevail.

Sincerely,

Roger Worthington, Esq.  
President

Rick Martinson, Ph.D.  
Executive Director

Enclosures (To Be Provided)

cc: Phil Chang, County Commissioner: [Phil.Chang@deschutes.org](mailto:Phil.Chang@deschutes.org)  
Holly Jewkes, Deschutes Forest Supervisor: [holly.jewkes@usda.gov](mailto:holly.jewkes@usda.gov)  
BJ Westland, Sen. Jeff Merkley's staff: [bj\\_westlund@merkley.senate.gov](mailto:bj_westlund@merkley.senate.gov)  
Sean Stevens, Oregon Wild: [ss@oregonwild.org](mailto:ss@oregonwild.org)  
Tim Leahy, Sen. Ron Wyden's staff: [Tim\\_Leahy@wyden.senate.gov](mailto:Tim_Leahy@wyden.senate.gov)  
Ben Gordon, Central Oregon LandWatch: [ben@colw.org](mailto:ben@colw.org)  
Anthony Broadman, Bend City Council: [abroadman@bendoregon.gov](mailto:abroadman@bendoregon.gov)