



Juniper Group, Oregon Sierra Club
c/o Environmental Center
16 NW Kansas Avenue
Bend, OR 97703



Bitterbrush Broads and Bros
Great Old Broads for Wilderness
Bend, OR 97702

Submitted via <https://www.fs.usda.gov/project/?project=64157>

29 October 2024

Blue Mountains Forest Plan Revision
US Forest Service
72510 Coyote Road
Pendleton, OR 97801

Regarding: Blue Mountains Forest Plan Updates, Draft Preliminary Need to Change,
<https://www.fs.usda.gov/detail/umatilla/home/?cid=fseprd1188541>

We recognize the ongoing efforts of the Forest Service (FS) to update the forest plans of the Malheur, Umatilla, and Wallowa-Whitman National Forests. Updates are needed to better match changing ecological conditions as well as changing political and economic realities. Thank you for the opportunity to submit our comments on this work as we speak on behalf of citizens who appreciate nature and give voice to the needs of a healthy ecosystem and biodiversity.

Members of our organizations frequently utilize these public lands for fishing, hunting, hiking, camping, quiet recreation, wildlife viewing, enjoyment of nature, and spiritual well-being. Our members who cannot physically visit these three national forests deeply appreciate the existence value of these lands and how they contribute to our national well-being. The contributions of our national forests, including these three, in terms of clean air, clean water, carbon storage, and more, are significant in the national and global efforts to maintain a healthy climate and environment for us all.

The stated mission of the FS is “to sustain the health, diversity, and productivity of the Nation’s forests and grasslands to meet the needs of present and future generations”. The past emphasis on “productivity” has been focused on the limited short-term goals of timber and cattle production, which has seriously harmed and degraded our national forests by decreasing health and biodiversity. The growing public and political acknowledgment of this fact (long known in scientific circles) requires that revised forest plans emphasize protection of natural, healthy forest processes and biodiversity, and limit natural resource extraction to levels that can benefit future generations with continuing forest health, diversity, and productivity.

We advocate that these national forest plan revisions emphasize the long term growth and health of our treasured national forests, acknowledging the many benefits that go with healthy forests, such as clean air, clean water, soil creation, erosion control, flood control, climate and microclimate effects, pollinator health, native plant and animal health, wildlife refugia and migration, nutrient cycling, plant succession, recreation, mental health, and even the potential for long-term sustainable resource extraction. We know from experience that the FS and others use different definitions or have different expectations from the concepts here listed, so we will try to be clear with what we expect in the following text.

As you have our comments from May 2024 for the Assessment phase, we will here focus on your Draft Preliminary Need for Change (“DPNC”), October 2024, document.

Historical or Reference Conditions

As noted in the DPNC (p. 3), the 2012 Planning Rule looked at ecosystem management with a goal of “maintaining or restoring key ecosystem characteristics within a range based on historical or other reference conditions”. Yet even well before 2012, the use of historical conditions for management has been questioned as the best available science.

We agree that the forest ecosystems of these forests has long been degraded over what it should and could be. We agree with the many scientific articles that the root causes of this includes fire management, livestock grazing, over harvest of timber, climate change, invasive species, recreation overuse, and more.

In updating these forest plans, the FS must consider the future climatic conditions¹. Changes in society and the economy are happening at a faster rate than in the past, which means that the “needs of future generations” (FS mission) are more complex and changing. The best use of forests is no longer for extraction of timber and livestock grazing, but for recreation, carbon storage, and reaching the 30 by 30 and 50 by 50 goals for landscape protection². The FS must plan forward, not backward.

Forest Plan Direction and 2012 Planning Rule

The DPNC (p.3) also states the need to bring the forest plans into alignment with the 2012 Planning Rule. Please see the section above for why this is inadequate. In addition:

- There is much new science and scientific understanding about ecological processes that has happened since 2012 that must be considered in forest management. For example, the 2012 Planning Rule called for a baseline assessment of carbon stocks. Much work on this has been done, and the forest plans must move on to increasing carbon stocks.
- There is much more public and political desire and will to improve forest management beyond that presented in the 2012 Planning Rule, including Executive Order 14072³. Old-growth and recruitment of mature trees and healthy ecosystems are more critical to restore as the consequences of their decimation are more fully understood. These areas must be protected and expanded and there should be no more cutting of old growth and mature replacement trees, an emphasis on nature-based solutions of carbon storage, restoration of water quality and quantity, and biodiversity.
- The 2012 Planning Rule calls for monitoring. This has always been a weakness and often a failure in FS management, carrying out monitoring baseline and trend conditions for riparian habitats, streams, water quality, and wildlife habitats, and consequences after projects are implemented.

¹For example: Keane, Robert E., Lisa M. Holsinger, Russell A. Parsons, and Kathy Gray. 2008. “Climate Change Effects on Historical Range and Variability of Two Large Landscapes in Western Montana, USA.” *Forest Ecology and Management* 254 (3): 375–89. <https://doi.org/10.1016/j.foreco.2007.08.013>.

²The landscape protection goals are 30% land protected by 2030, and 50% land protected by 2050. Protection means limited human activities allowing natural ecological processes to fully function.

³<https://www.govinfo.gov/content/pkg/FR-2022-04-27/pdf/2022-09138.pdf>

The amended forest plans must mandate and enforce compliance to monitor natural resource conditions such as riparian areas, streams, and wildlife habitats. Furthermore, this data and information must be made available to the public regarding forest conditions and management practices. We have resorted too often to Freedom of Information Act requests to get this public data. Make this data freely available, this information that is alleged to be public but has not been provided as such.

Desired Conditions

The DPNC (p. 4) mentions the current forest plans “desired conditions and objectives”. We emphasize that desired conditions for our public forests must have high levels of natural biodiversity, maintain wildlife connectivity corridors across the continent, support water quantity and quality by restoring streams and beaver habitat, provide areas for experiencing and learning about nature for many generations, support wild areas, undeveloped lands and wilderness areas, protect and expand old-growth and mature forest stands, and preserve natural processes and native species as a priority.

We can and will support some logging, but the desired objective is to have biodiverse forests and healthy streams and riparian areas, not tree farms and heavily grazed livestock pastures.

Reduce Wildfire Risks

The DPNC (p. 5) on the wildfire risk section perpetuates current FS practices around wildfire, with which many scientists and organizations disagree. Of particular concern are projects to create fire breaks and perform thinning operations. While such operations are desirable close to residential developments, the detrimental effects of such management activities are seldom noted or reported.

The detrimental effects include most egregiously the fragmentation and loss of habitat. Lines of broken habitat already crisscross the landscape in the form of roads, often at an extreme high density. Adding even more breaks with even wider gaps between trees is harmful to wildlife movement, creates corridors for invasive species and new areas for illegal expansion of user-created trails, dries corridors for faster wildfire spread as well as bringing in more people who are the dominant source of wildfire ignition. Under natural conditions, disturbances happen and create gaps in a forest, but the large areas created by roads and fire breaks, have degraded and fragmented natural habitats, increased the risk of wildfire ignition by humans, and contribute to loss of biodiversity.

The amended forest plans should limit fire risk management to areas close to residential developments and must reveal the detrimental effects. Efforts to minimize harm to the environment by such management activities must be enforced.

Forest Plan Standards

The revised forest plans must have strong standards for any management activity, standards that protect the natural forest processes, biodiversity, riparian areas and streams, limits on road densities and actions to close roads permanently, the long-term health of the forest ecosystem, and provide for the long-term greater good of society. Plans must also consider no management or minimal management as the best means of achieving these goals, such as retaining all undeveloped lands.

We are concerned that the FS is using the forest plan revision process as an opportunity to reduce important environmental standards such as the Eastside Screens, ICEBMP, PACFISH and INFISH. These interim standards have been used to protect and restore critical habitats such as old growth trees and riparian and stream habitats that are necessary for many critical fish and wildlife species. Without any standards in place, it will become a “free for all” for extractive timber and livestock industries, and there will be no regulations to assure restoration of degraded and fragmented fish and wildlife habitats. Most forest plans have been in place for 30 or more years and without enforcement and compliance of these standards (e.g. road densities, commercial harvest in riparian areas, extensive livestock grazing), degraded fish and wildlife habitats have persisted and have failed to recover. These standards must be upgraded to support native species, not eliminated or reduced, and also require monitoring, compliance and enforcement, to restore landscape level protections, species biodiversity, and habitats.

For example, the three forests, like many forests in eastern Oregon, have a long history of not closing roads once they are constructed. In fact, the Wallowa Whitman and Malheur forests are the only two forests in the entire United States that have violated the Travel Management Rule and failed to complete and implement required Travel Management Plans. How can the public that cares about impacts of management activities on fish and wildlife populations and their habitats trust an agency that has failed to meet the legal requirements of the 2005 Travel Management Rule? Both forests have had almost 20 years to produce and implement Travel Management Plans but have failed to do so.

Many of our conservation community members and those who appreciate quiet non-motorized backcountry have experienced countless areas on the three forests where we have encountered motorized vehicles traveling on the innumerable roads and overland travel across country that were created by “management activities.” New standards for road densities must be established in the new plan to limit and enforce compliance for road densities to reduce habitat fragmentation, the spread of invasive plant species, poaching and illegal user created trails, sedimentation of streams, and loss of water quality.

As a minimum, forest plans must include standards that do not allow harvest of large trees; must protect from human disturbance old-growth stands and stands with mature trees to replace old growth; must protect riparian areas from commercial timber harvest with designated buffer widths; must prevent fragmentation of habitat and support the establishment of migration corridors; must protect wildlife, species of conservation concern, and refugia; must remove roads and protect unroaded and undeveloped areas; and must not allow steep-slope logging.

Existence Values

As mentioned earlier, some of our members can visit and enjoy our national forests while many value their existence even if they cannot visit areas due to infirmity or lack of means. The existence value is knowing that a particular species, habitat or ecosystem will continue to exist because it is protected. The existence value of an environmental resource is a passive value that is free of any use and is the benefit derived from the mere existence of a natural asset. For example, part of the best use of an old growth tree is not just for wildlife or clean water but is simply there to be enjoyed and appreciated. The FS must emphasize in forest plan revisions that some areas (such as undeveloped lands) are not for resource extraction (e.g. livestock grazing and timber harvest) and profit by local or corporate users, but should be left intact for native species, unfragmented habitats, and clear clean flowing streams.

Additional Comments

The revised forest plans must provide benefits for many people for many generations, that accurately reflect limits that must be imposed upon any use of our finite forest resource, that adjust with changing climates and societal changes, while maintaining the highest regard for the natural processes which humans and human societies are dependent upon. Attempting to manage natural processes, such as fire, has negatively impacted the environment upon which humanity depends. Knowledgeable scientists that understand the intersection of science and nature such as Dr. Robin Wall Kimmerer advocate for not only restoration of ecological communities, but restoration of our relationships to land. The FS must discard the conventional mantra of “managed treatments” and use traditional ecological knowledge, nature-based solutions, and rewilding to work with and support natural processes and native species and their habitats, rather than “manage” them. For example, one easy step using rewilding and a nature based solution, is to ask ODFW to remove beaver trapping on all areas of the three forests to allow expansion of beaver into unoccupied habitats. While we recognize there are some closures, these closures should be expanded to include the entirety of the three forests.

The FS must work closely with other agencies, state agencies, tribal entities, conservation organizations, and public organizations, rather than focusing on “local opinions” which favor resource extraction for timber and livestock industries. We remind you that national forests are “national” and not local. They are for ALL Americans not just the local communities. Advocates for industry and resource extraction must not be given deference over advocates for conservation and environmental protections. Inclusion of both traditional ecological knowledge, rewilding and nature-based science solutions must be used in deciding management activities. Western science continues to grow in understanding natural ecological processes and untouched and undeveloped public lands are important areas contributing to this growth, are reference areas that benefit native species, and are particularly important for biodiversity and water quality. Western science grows through debate, and the FS must listen to views from more than just the science paid for by the timber and grazing industries.

Above all, in the revised forest plans, the FS must acknowledge that our public national forests are a finite resource, and in order “to meet the needs of present and future generations”, limits on human activities, especially resource extraction, have to be set and natural ecological processes must be allowed to resume.

Sincerely,

Amy M. Stuart

/s/ Amy Stuart, Co-Leader
Central Oregon Bitterbrush Broads and Bros
Great Old Broads for Wilderness
Prineville, Oregon
amystuart63@gmail.com

Mathieu Federspiel

/s/ Mathieu Federspiel
Juniper Group Executive Committee
Oregon Chapter Sierra Club
<http://bit.ly/junipergruophome>
Bend, Oregon
mathieuf.sc@gmail.com