



**National Headquarters**

1130 17th Street, N.W. | Washington, D.C. 20036-4604 | tel 202.682.9400 | fax 202.682.1331  
[www.defenders.org](http://www.defenders.org)

November 5, 2024

Umatilla National Forest  
Blue Mountains Forest Plan Revision  
72510 Coyote Road  
Pendleton, OR 97801

Delivered to: <https://cara.fs2c.usda.gov/Public/CommentInput?Project=64157>

**RE: Comments on the Preliminary Need to Change for the Blue Mountains Forest Plan Revision**

Defenders of Wildlife submits these comments to the U.S. Forest Service on the Preliminary Need to Change for the Blue Mountains Forest Plan Revision. Our comments recommend specific additional considerations for the Need to Change that will help define the scope of the plan revision effort. Defenders of Wildlife (“Defenders”) is a national non-profit conservation organization with over two million members and supporters nationwide, including approximately 100,000 members and supporters in Oregon and Washington states. Founded in 1947, Defenders is dedicated to the protection of all native animals and plants in their natural communities.

The Blue Mountains National Forests play a vital role in supporting both the ecological resilience and the local economy of Northeast Oregon and Southeast Washington. However, the landscape has undergone significant changes since the existing forest plans took effect in 1990, including increased wildfire activity, evolving public use patterns, shifts in wildlife populations, and numerous effects on the ecosystem stemming from climate change. These changes highlight the need to revise the forest plans in a way that reflects the latest scientific understanding and addresses the dynamic needs of the Blue Mountains National Forest ecosystem.

In the Draft Preliminary Need to Change document, the Forest Service identified seven key aspects of the Preliminary Need to Change:

- 1990 Forest Plan Direction is Inconsistent with the 2012 Planning Rule

- Plan Amendments Point to the Need for Revision
- Work together to create durable, implementable, integrated land management plans
- Address Contributions to Social and Economic Sustainability
- Address a Changing Climate
- Maintain or Restore Aquatic Habitats and Ecosystem Integrity
- Maintain or Restore Ecosystem Integrity and Reduce Wildfire Risks to Habitats and Communities

A critical aspect missing from the Preliminary Need for Change document is the integration of wildlife habitat connectivity to maintain and restore ecosystem integrity. Establishing plan components that connect fragmented habitats will enhance biodiversity, facilitate genetic flow, and improve the resilience of wildlife populations.

The importance of considering connectivity and migration corridors is underscored in the August 19, 2022, Memorandum from the Deputy Chief titled *Habitat Connectivity and Migration Corridors in National Forest System Planning and Decisions*.<sup>1</sup> This directs the Agency to consider policy options for conserving habitat connectivity and migration corridors “during broad-scale planning associated with the land management planning process.” On October 21, 2024, Secretary Vilsack signed a Secretarial Memorandum that requires coordination and action within the Department of Agriculture to enhance wildlife connectivity for terrestrial wildlife by collaborating with States and Tribes, optimizing Federal land management, and respecting private property through local, voluntary conservation.<sup>2</sup> Given the importance of these National Forests as a key linkage in the region, the updated plans must prioritize restoring habitat connectivity to support species movement across the landscape.

A second aspect missing from the Preliminary Need for Change document is related to the recovery of native wildlife species, including the gray wolf, to the planning area. In particular, the re-establishment of wolves, which is not contemplated in the current land use plan, offers a unique opportunity to restore natural ecological processes, such as predator-prey dynamics, which have been disrupted for decades. The recovery of this keystone species not only contributes to biodiversity but also helps balance populations of

---

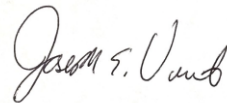
<sup>1</sup> USFS Deputy Chief's 2022 Memorandum, *Habitat Connectivity and Migration Corridors in National Forest System Planning and Decisions*  
<https://largelandscapes.org/wp-content/uploads/2022/09/Habitat-Connectivity-and-Migration-Corridors-in-National-Forest-System-Planning-and-Decisions.pdf>

<sup>2</sup> See Secretarial Memorandum 1077-013

other wildlife, fostering healthier and more sustainable ecosystems. To effectively support ongoing wolf recovery, the revised plans should explicitly incorporate strategies that protect core habitats, reduce human-wildlife conflict, and ensure that land management practices, such as grazing, are aligned with gray wolf conservation goals.

Updating the Preliminary Need to Change to include these elements will help create forest management plans that are better equipped to adapt to evolving conditions, including the impacts of climate change. By incorporating the science of connectivity and the principles of species recovery, the forest plans can support the ecological integrity of the Blue Mountains while continuing to sustain local economies. This approach is essential for fostering resilient landscapes that can meet the needs of future generations.

Joseph Vaile

A handwritten signature in cursive script that reads "Joseph F. Vaile".

Senior Representative

Northwest Program, Defenders of Wildlife