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Blue Mountains Forest Planning Team
Umatilla National Forest Headquarters
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Submitted electronically at: https://cara.fs2c.usda.gov/Public//CommentInput?Project=64157

Re: Blue Mountains Biodiversity Project's comments on the Blue Mountains Forest Plan Draft Preliminary Need to Change

Please accept the following comments submitted on behalf of Blue Mountains Biodiversity Project ("BMBP") on the "Draft Preliminary Need to Change Malheur, Umatilla, and Wallowa Whitman National Forest Plans" ("DPNC"). BMBP is an environmental nonprofit that works to protect and conserve the natural ecosystems on public lands within the Blue Mountains and Eastern Cascades ecoregions. BMBP's staff and volunteers have spent countless hours in the forests of the Malheur, Umatilla, and Wallowa-Whitman National Forests, and as such, have intimate knowledge of what changes to the Forest Plans are necessary to "adequately address current science and local knowledge," DPNC at 1, as well as better protect the forested ecosystems of the Blue Mountains.

Large tree and old-growth protections must remain in place as strong, enforceable standards for wildlife habitat, climate change mitigation, and community fire risk reduction

While plan amendments to the current 1990 forest plans may point to a need for revision, DPNC at 3, in many instances, those amendments are still necessary to address existing forest conditions. This is especially true in the context of the 1994 Eastside Screens amendments to many forest plans, including the Umatilla, Malheur, and Wallowa-Whitman National Forest Forest Plans. These amendments to the 1990 Forest Plans—enacted as wildlife habitat protections—prohibited the logging of trees ≥21" DBH across the forests and prohibited logging within LOS stands below HRV. These prohibitions currently exist as standards in the applicable forest plans, and BMBP is very concerned that, following the legally flawed 2021 attempt to amend the Eastside Screens, the Forest Service will attempt to shift these standards to less-stringent guidelines in this renewed effort at amending the Blue Mountains Forest Plans.

The Eastside Screens were initially enacted due to a deficit of large trees in Oregon and Washington due to a century of over-logging, fire suppression, and mismanagement at the hands of the Forest Service. Recent peer-reviewed scientific studies in the region have shown that this deficit still exists today. Large trees ≥21" DBH represent only 3–4% of stems in the region, making these vital components of the ecosystem incredibly rare.[1] As such, an unenforceable Forest Plan guideline that would allow for the logging of trees ≥ 21" would not only *not* address the continued rarity of large trees

[1] Mildrexler, D., L.T. Berner, B.E. Law, R.A. Birdsey, W.R. Moomaw. 2020. Large trees dominate carbon storage east of the Cascade crest in the U.S. Pacific Northwest. *Frontiers in Forests & Climate Change*.

that many Management Indicator Species, Species of Conservation Concern, and ESA-listed species depend upon for their survival.

The large tree and old-growth protections of the Eastside Screens provide a myriad of co-benefits beyond just protecting the wildlife habitat they were initially created for. Among the myriad of important co-benefits of protecting large trees is the necessity of large trees to combat the worst effects of climate change and global warming. Regional peer-reviewed scientific studies have shown that large trees are disproportionately effective at sequestering and storing atmospheric carbon.[2] Mildrexler at al. (2020) found that, despite representing just 3–4% of stems on the forest, trees ≥21" DBH stored approximately 42% of aboveground carbon stocks across the forest. This makes strong, enforceable standards protecting large trees absolutely vital components of Forest Plans intended to "address a changing climate." DPNC at 4.

Importantly, using static historical conditions to inform the need for change is inappropriate in the context of a rapidly changing climate and other anthropogenic stressors.[3] There is a need to change the Blue Mountains Forest Plan to address the climate-resiliency of our forests, but that is not accomplished by looking backwards. The climate crisis requires the effective utilization of all available resources of climate change mitigation. A such, the need for large tree and old-growth forest protections in the Blue Mountains Forest Plan revisions is of the utmost importance.

Further, the natural fire-resistance of large trees and the canopy coverage that develops as forests mature make large trees and old-growth forests necessary to "maintain or restore ecosystem integrity and reduce wildfire risks to habitats and communities." DPNC at 5. The thick bark that develops as trees are allowed to age naturally provides large trees a fire-resistance.[4] Therefore, logging large trees of all species inherently makes our national forests less-resilient to fire. It is also well-established that weather events are the primary driver of uncharacteristic, high-severity wildfires.[5] In fact, logging large trees and opening up the forest canopy increases aridity and windy conditions that exacerbate what may otherwise be manageable and beneficial fire conditions.[6] [7] In general, studies have shown that older forests

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[2] Mildrexler at al., 2020; Mildrexler, C., L.T. Berner, B.E. Law, R.A. Birdsey, W.R. Moomaw. 2022. Protect large trees for climate mitigation, biodiversity, and forest resilience. *Society for Conservation Biology*. https://doi.org/10.1111/csp2.12944

[3] Millar, C. I., Stephenson, N. L., and Stephens, S. L. (2007). Climate change and forests of the future: managing in the face of uncertainty. Ecol. Appl. 17, 2145–2151. doi: 10.1890/06-1715.1

[4] Moris, J.V., Reilly, M.J., Yang, Z. et al. Using a trait-based approach to assess fire resistance in forest landscapes of the Inland Northwest, USA. Landsc Ecol 37, 2149–2164 (2022). https://doi.org/10.1007/s10980-022-01478-w

[5] Keyser, A, A Westerling. 2017. Climate drives inter-annual variability in probability of high severity fire occurrence in the western United States. *Environ. Res. Lett.* 12 065003.

[6] Stephen Fitzgerald and Max Bennett. 2013. A Land Manager's Guide for Creating Fire-Resistant Forests. EM 9087. OSU Extension. http://www.nwfirescience.org/sites/default/files/publications/A%20Land%20Managers%20Guide%20for%20Creating%20Fire-resistant%20Forests%20.pdf

[7] Morris Johnson, David L. Peterson, and Crystal Raymond 2009. Fuel treatment guidebook: illustrating treatment effects on Fire hazard. Fire Management Today 69(2) http://www.fs.fed.us/fire/fmt/fmt_pdfs/FMT69-2.pdf p 32-33

experience lower-severity fire events than intensively managed (i.e. logged) younger forests.[8] While there is clearly a need to change how our forest plans address concerns regarding fire and community safety, that change needs to be based on scientifically proven home-hardening methods rather than logging in the backcountry and logging large trees.

Other Concerns regarding the Draft Preliminary Need to Change

While there may be a need to revise the Blue Mountain Forest Plans to abide by the 2012 Planning Rule, there is also the pressing need to abide by sweeping U.S. federal policies to address the climate crisis[9]—in part by conserving at least 30% of our lands and waters by 2030—and to conserve and protect mature and old-growth forests.[10] Any forest plan revisions must take into account and address the policies set forth in these Executive Orders, and yet they are not addressed at all in the Draft Preliminary Need to Change.

BMBP is concerned by the lack of specificity when it comes to the need to "provide plan components for social, economic, and ecological sustainability[.]" DPNC at 4. Due to the lack of specificity provided, it is logical given the region's past economic drivers to assume this discussion of local economic sustainability is linked to timber production. Of course, this singular focus ignores the economic value of intact forested ecosystems, not just for local communities, but regional and national communities as well. In order to provide for the economic sustainability of local communities, the Forest Service must acknowledge the need and work to separate the reliance of local economies from logging and timber production. The Preliminary Need to Change needs to recognize the need to diversify local economies to provide for true economic sustainability into the future. It has not done so in this draft.

Lost in the important discussions regarding the needs to maintain and restore ecosystem integrity is the need to plan for habitat *connectivity*. The Blue Mountains ecoregion—which provides some of the most intact habitat left in the region Pacific Northwest[11]—serves as an important wildlife corridor connecting the Rocky Mountains in the east to the Cascade Mountains in the west.[12] Connectivity is a key component of ecosystem integrity under the 2012 planning rule, 36 C.F.R. § 219.8(1), and the opportunity to revise three national forest plans in the region that collectively serve as a vital wildlife corridor is a great opportunity to protect and improve this connectivity within these individual forests, between all three Blue Mountains National Forests, and between broader ecoregions. And yet, there is no discussion of such a need in the Draft Preliminary Need for Change.

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[8] Zald, H. S. J., and Dunn, C. J. (2018). Severe fire weather and intensive forest management increase fire severity in a multi-ownership landscape. Ecol. Appl. 28, 1068–1080. doi: 10.1002/eap.1710

[9] E.O. 14008, "Executive Order on Tackling the Climate Crisis at Home and Abroad," Jan. 27, 2021.

[10] E.O. 14072, "Executive Order on Strengthening the Nation's Forests, Communities, and Local Economies," Apr. 22, 2022.

[11] McGuire, J. L., Lawler, J. J., McRae, B. H., Nuñez, T., and Theobald, D. M. (2016). Achieving climate connectivity in a fragmented landscape. Proc. Natl. Acad. Sci. U.S.A. 113, 7195–7200. doi: 10.1073/pnas.1602817113

[12] Kerns, B. K., Powell, D. C., Mellmann-Brown, S., Carnwath, G., and Kim, J. B. (2017). Effects of projected climate change on vegetation in the Blue Mountains ecoregion, USA. Clim. Serv. 10, 33–43. doi: 10.1016/j.cliser.2017.07.002

Finally, BMBP is concerned by the lack of discussion of Tribal Rights, Tribal co-management, and Tribal knowledge in the Draft Preliminary Need to Change. There is a clear need to change the Blue Mountains Forest Plans in order to go beyond past and current efforts to consult with Tribes, and it can accomplish some of this by identifying and discussing needs to safeguard important sites, incorporate Tribal knowledge, provide for co-management opportunities with Tribal leadership, commit to protecting culturally important wildlife, aquatic and plant species and enhancing their habitat.

Thank you for consideration of BMBP's comments on the Draft Preliminary Need to Change.

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