

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

November 5, 2024

Re: Comments on Draft Preliminary Need to Change Document

Dear Sir:

I appreciate the opportunity to make comments on the Draft Preliminary Need to Change document. Comments are due November 7, 2024 and my comments are timely.

My first comment is that each of the three National Forests is unique, and the Forest Service is erring when they try to lump the analysis into one document.

On page 3 of this document, I would remind the Forest Service that the 2012 Rule requires the Forest Service to *"adapt to changing conditions, including climate change"*, but certainly does not *"explicitly require consideration of climate change as a system stressor and driver"*. Please change this statement to reflect what the 2012 Rule actually requires.

As to the format for this Draft, a good way for the Forest Service to present this Draft Preliminary Need to Change document is to begin with a set of definitions. The 2012 Rule was written for Bureaucrats, not the Forest users who would like to understand what this is all about.

Please define the following:

Adaptive Management
Ecological integrity
Ecosystem integrity
Dominant ecological process
Disturbance Regimes

On page 3, the Draft states that the 1990 Forest Plan is inconsistent with the 2012 Rule. First, which Plan is the Draft referring to, since previously, the Umatilla, Malheur and Wallow-Whitman each had their own Plans? It would help people understand what the problem is, if the Forest Service would give an example or two of the standards and guidelines and management direction that are not consistent with the 2012 Rule. The feeling of the public is, just because the Forest Service says there is a problem, if they won't give examples showing what the problem is, then there probably isn't any problem.

Also, on page 3, what are some of the *"inflexible management directions"* in the 1990 Plan? And again, which Plan has this problem? The three Forest Plans were amended many times over the years as conditions changed, and I have not seen the Plans to be *"inflexible"*. On page 4, the Draft verifies this in saying many *"amendments"* have already been incorporated into the 1990 Forest Plan.

On page 4, the Draft states that monitoring has *"revealed some conflicts and inconsistencies between management direction for various resources"*. Again, it would help the public if you gave some examples.

On page 5, the Draft states *"some of the science cited by the three interim plan amendments is no longer relevant"*. Again, it would be helpful to the public to know what that irrelevant science is.

On page 5, please revise the first sentence under **Maintain or Restore Ecosystem Integrity....** To read "Exclusion of fire, **historic** timber harvest, **recent lack of timber harvest and timber management** and a warming climate....

The Forest Service says they are committed to working with the public on revisions to the Forest Plans. If this is actually the case, tell us what you see as the current problems with the 1990 Plans so we can understand why there is a need for change.

Sincerely,


Jan Alexander
Minerals Policy Director
Eastern Oregon Mining Association
