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Umatilla National Forest
Blue Mountain Forest Plan Revision
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To: Blue Mountains Forest Plan Revision Team

Comments: Draft Preliminary Need to Change

Thank you for preparing the draft document and for providing a way to comment. What follows will include links that are in support of the statements that are made.

Section: Abstract & Introduction

The discussion in this section is clear about the reasons for development of the draft plan. The dynamic changes to the plan, with additional changes as the Team hews to the 2012 Planning Rule, is essential and much appreciated. A comprehensive monitoring scheme, one developed with remote sensing technology including ever-cheaper drones, is of great interest to me. I look forward to the details about that plan.

This is long-needed given the requirements of the Forest and Rangeland Renewable Resource Planning Act of 1974 and the twelve years since the Planning Rule was made policy. It is unfortunate that forest plans have not been comprehensively rethought since the 1990s until now.

Section: 2012 Planning Rule

With regard to <u>ecosystem integrity</u>

Ecosystem integrity must be paramount. Without that requirement the ecological components will be compromised and the social and economic components unsustainable. It leads or every other component bleeds.

With more than a decade since the Rule was published, the seemingly endless series of climate calamities has made explicit planning for a changing climate crucial. Extended episodes with greater variability, fluctuating between extreme precipitation events and years-long droughts, are now the norm. The adoption of "*the rule* [that] *explicitly requires consideration of climate change as a system stressor and driver*" is long overdue.

With regard to chronic stressors

There needs to be a clear understanding that so-called chronic stressors including insect-host relationships are a function of forest management practices. After the coring of the Greenland ice sheet in the early 1990s, it was obvious that dramatic fluctuations in the climate record were quite commonplace. There's a very regular 1470 year cycle embedded in that record. That's an instant in evolutionary history. That implies that the genetics of our forest species – evolving as they have been for millions of years – have to have the necessary diversity to deal with both ends of many such cycles.

As a result, forest ecosystems have dynamism built in to allow for an almost immediate transition from one climate regime to the other. Scientists working with the ice cores were never able to slice them thinly enough to figure out how long it took for the transition to happen. The conjecture was that Earth's climate can go from an average temperature a few degrees cooler than we currently experience to one a few degrees warmer in less than twenty years, but some analysts felt it might be as little as ten or even five years. That's an enormous change in the energy balance of the planet, one that would have ecosystems reworking themselves very quickly. How can such rapid change take place? What are the mediating agents?

The answer is that insects have evolved to provide feedback when forest conditions change as they have many times in the past. Artificially inducing such changes through forest-type conversions when such conversions do not reflect the existing micro-climatic and soil regimes is a mistake. Attempts to force tree-growth into some desired production cycle by artificially manipulating forest ecosystems will bring that feedback into play. Insect populations have evolved in concert with the forests they inhabit. They cannot be poisoned out of existence. Adapt that knowledge to this planning effort.

As the Forest Service has learned – the hard way – fire is another "stressor" that mediates forest ecosystems, something that had been wildly misunderstood. The rebound from over one hundred years of fire suppression has been humbling for everyone. Acknowledgment of that reality has finally started to inform management objectives for which the agency should be applauded. Please expand on that idea.

Preliminary Need to Change the Blue Mountains Forest Plans

Section: 1990 Forest Plan Direction is Inconsistent with the 2012 Planning Rule

The focus on outcomes as opposed to outputs is long overdue. Those outcomes determine the likelihood of any meaningful outputs. It's encouraging to have that clearly understood as part of the planning process.

Section: Plan Amendments Point to the Need for Revision

The development of flexible standards, informed by a series of amendments the plans incorporated over the last few decades, seems reasonable. That's true as long as science-based decision making holds sway once those standards are in place. That must be a policy made clear to everyone involved with project implementation. Sustainable ecosystems is the goal even as a changing climate makes that a moving target. The effectiveness of those standards relies on a greatly strengthened monitoring regime providing rapid feedback from projects and allowing for ongoing changes to those standards.

Section: Work together to create durable, implementable, integrated land

These are public lands, a system that has no equals in the rest of the world. By definition, that means input from as many entities as possible. Purely short-term economic motivations, however, must be replaced with a long-term vision that moves inexorably to sustaining ecosystems for the benefit of everyone.

Section: Address Contributions to Social and Economic Sustainability

With regard to ecological sustainability:

Ecological sustainability drives all of the other possible contributions including social and economic sustainability.

Past efforts to modulate forest conditions through forest conversion when the best-adapted species were removed for economic gain, have overdrawn the account for social and economic benefits. Those benefits were delivered at below replacement costs required to sustain ecological integrity. Gradually rebuilding those forests while adapting to a changing climate will be crucial to the future ecological sustainability of all three National Forests.

That will not be easy and must be done with consideration for local interests which have in the past relied on that overdrawn account to create what they believed were viable long-term local economies.

With regard to a changing climate:

The changing climate will bring greater variability to our forest ecosystems, including longer episodes of drought. Western forests have evolved symbiotically with such changes in the past. Foresters must recognize and understand those evolutionary dynamics. They will rework ecosystems and planning for those changes is part of the process.

That variability will be manifest in ways that will impact all aspects of our forest ecosystems. Wildlife must have the ability to migrate to more suitable conditions as those changes take hold. Contiguous boundaries for all three forests insure connectivity, so the identification and development of travel

corridors for such migrations should be part of this planning effort. Judicious choices for closure of what is an excessive and erosion prone residual road system can help with this process, allowing for just such corridors to evolve naturally.

That is all part of the adaptations necessary to preserve these ecosystems in their entirety.

Section: Maintain or Restore Ecosystem Integrity and Reduce Wildfire Risks to Habitats and Communities

With regard to historic timber harvest

Those "*historic timber harvests*" which removed the valuable Ponderosa pines and which were followed up by replanting with Douglas fir and true fir were failed attempts at forest conversion without regard for the ecological sustainability of the existing ecosystem. Those prescriptions were serious mistakes that "*created vegetation, fuel loads, and habitat characteristics on the three national forests with uncharacteristic forest compositions, structures, densities, and spatial patterns.*" The "*landscape management*" discussed in this section must reflect the actual site requirements and conditions including the availability of water and potential nutrient shortfalls induced by a changing climate and by overstocked stands. Any realistic landscape management must be informed by the dynamics of that transition.

Thank you for your time on this planning effort.

Norm Cimon