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17 July 2025

Johnny Collin, District Ranger
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Regarding: Mottet Vegetation Management Project 67275, Scoping,
<https://www.fs.usda.gov/r06/umatilla/projects/67275>

Ranger Collin:

The Juniper Group, Oregon Chapter Sierra Club (JG) and the Bitterbrush Broadband, Great Old Broads for Wilderness (BB), are responding together to the Umatilla National Forest (UNF) request for comments on the Mottet Vegetation Management Project (67275), the Scoping letter from June 23, 2025 (Scoping).

The mission of the BB is to preserve and protect wilderness and wild lands. We give voice to the millions of Americans who want to protect their public lands and wilderness for current and future generations, we bring knowledge, leadership, and humor to the wilderness preservation movement, and we educate the public about the critical connection between healthy public lands and climate change mitigation.

The mission of the JG is:

- To explore, enjoy, and protect the wild places of the earth.
- To practice and promote the responsible use of the earth's ecosystems and resources.
- To educate and enlist humanity to protect and restore the quality of the natural and human environment; and to use all lawful means to carry out these objectives.

We are responding in the interest of fulfilling our missions, and representing our membership in Oregon and the whole of this country. We follow guidance from our national offices as well as from local users of UNF.

Extent

As Scoping identifies this project area as including over 48,000 acres, we are concerned about the impact it will have on the larger ecosystem, wildlife migration routes, water quality in multiple

watersheds, and more. The FS intervention in such a large area is obviously not benign, is a major disturbance to the ecosystem, and an appropriate environmental analysis must be done to provide both the FS and the public with an understanding of potential impacts, both short and long term.

Regarding Background Section

The section in Scoping on Background has several problems we find concerning.

First, the letter states that the current state of the forest condition has been growing for decades and still it declares this an emergency. This ignores that fact that forests operate naturally on long time frames, and several decades is not much time for a forest. Management of a forest based upon questionable emergencies is detrimental to the overall health of the forest and the long-term cycles to which forest trees and ecosystems are adapted.

The paragraph describing what happens when “trees are too dense” incorrectly states that tree “density will continue to increase” even under conditions of limiting sunlight and moisture. This is blatantly wrong, as the science of ecology teaches that under such conditions plant density and size are self-limiting: New plants will not mature or grow beyond what sunlight and moisture is available, they will die or be weakened and suffer from disease and insects. This natural limiting process provides the biodiversity and complexity of a healthy forest ecosystem, with many plants competing for limited resources, insects and other decomposers returning nutrients to soil, and providing for a large part of the food web that cycles back to birds, rodents, and other life. The beetles mentioned in Scoping are part of this complex food web and nutrient cycle, as well as plant succession. Under natural processes the forest will progress from relatively young seral stages with dense plant growth to older seral stages with less undergrowth.

The next paragraph in Scoping is incomprehensible in terms of forest health, as it states that multi-story structures are a problem when single-story or even-aged structures are better. That may be true for a tree farm, and may aid the UNF stated goal of provided forest resources for the local economy, but it is not true for forest health, biodiversity, or the long-term well-being of the local economy and wider society. A healthy, biodiverse forest, with many seral stages that vary across the landscape, benefits many more people of many more user groups and a large segment of society, which a tree farm does not.

The final paragraph in the Background section of Scoping mentions the anticipation of continuing drought and increasing temperatures for the climate of this project area. Efforts of this project fail completely to look at these long-term changes and how the forest ecosystem may need to change to accommodate them. Instead, it looks at short-term changes that attempt to create a profitable tree farm for timber resources. While allowing select trees to prosper by removing competition may sound good in the short-term, it will destroy this forest and the local economy that depends upon it for more than timber, but also clean air, clean water, and recreation.

Regarding Purpose and Need

While the Purpose and Need given in Scoping talks about reducing the risk and increasing resilience, given the errors and assumptions in the Background section, the ability to meet this part of the purpose and need is doubtful.

The objective of bringing the forest to conditions where “commercial harvest can be implemented” is wrong given the conditions described in the previous section. Scoping describes how the climate of the project area is changing and how this is stressing the forest. Managing for a commercial harvest is likely to result in the collapse of the forest ecosystem to the extreme detriment of local communities.

Scoping describes “the need for this project is” to bring desired conditions to landscapes to allow commercial harvest, and then states that a secondary purpose “is to provide wood products for the local economy.” These are pretty much the same. Why double-down on this and not biodiversity? We also require that “desired conditions” be explicitly defined and described.

Scoping leaves out what the resource extraction quota is for the UNF and what part of this quota 67275 is designed to provide. The public needs to know what quota for timber harvest UNF is trying to meet and how UNF is planning to do this over the long-term. Most importantly, is the timber harvest quota a reasonable number that can be sustainably met while also fulfilling the other goals that a public, multiple-use national forest is required to meet? What is the plan for accomplishing these goals over the next 20, 50, and 100 years? Substantial comments are impossible without fully disclosing the purpose and goals of 67275 and the whole UNF.

We also note, while Scoping does not, that the local economy relies upon more than just “wood fiber harvested” off public lands, it also relies upon many forms of recreation, as well as the clean air and water provided by a healthy forest ecosystem.

We do not see riparian areas directly addressed in Scoping. Our concern is that these fragile ecological systems are easily damaged by human actions. The UNF must follow PACFISH and INFISH regulations: leave buffers around riparian areas, keep roads out of riparian areas, and minimize stream crossings.

What’s the Alternative

We understand the economic need for some resource extraction from the UNF. We suggest this be severely limited with planning for more reductions in the future. The most economic benefit for the local communities and all of Oregon is to have this forest provide some timber for the next 100 years or more while also contributing to carbon storage, animal migration routes, and the many recreational activities that such a beautiful area can attract.

Commercial and non-commercial harvesting (thinning) must be limited. These actions must be designed to limit habitat fragmentation and the increased drying of fuel and soil they bring, along with the increased likelihood of wildfire ignition by people visiting such disturbed areas due to roads and clearings that are created. These activities reset the forest ecosystem to an earlier seral stage while allowing the forest to progress to older seral stages with are more stable and wildfire resistant is preferable.

Prescribed fire, especially when coordinated with local Indigenous tribes, is appropriate.

Public Involvement

While Scoping states that an EA will be forthcoming, prior (we hope) to any implementation starting in 2026, it states that at least parts of 67275 may be implemented under Emergency Action Determination and this limits public input. We agree, this severely limits our ability to provide you with input and comments, along with the rest of the public's ability to comment, on this project.

We understand the attacks by the current administration on NEPA and on all public input is an attempt to prioritize resource extraction for short-term profits by select industries. As Representative Bentz put it in a recent reply to email, "environmental organizations ... make a mockery of agency's attempts to craft management plans." (dated July 15, 2025) He is wrong; we are involved and providing our comments to assist the UNF to make a stronger management plan that will work for many generations. We value our ability to provide useful and substantial comments and options that help support non-industrial uses of our public lands. Our comments respect the local economic importance of forest resources, as well as the global importance of standing forests. We often use a global perspective, as even the local economy is influenced by global factors such as trade and lumber prices.

In order to provide strong comments, we require that you provide the coming EA with all the supporting documents, such as forest plans and research reports, that you may produce or cite. As Scoping did not provide scientific details to justify the UNF understanding of current forest conditions and how to manage changes to that condition, we did not provide citations for our comments herein. We are prepared to do so with the EA. With the limited comment period (if any) for the EA that Scoping states is likely, we can only provide substantial comments if we can see all the information in a timely manner, and not use our precious and reduced time (mostly volunteer, by the way) searching for documents that UNF may produce or cite. (Needing to file FOIA requests would be an additional burden upon the public.)

Thank you for considering our comments. We hope these comments as well as comments from other organizations will help you make the EA a good document for multiple-use public lands managed by UNF for the long-term.

Sincerely,

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