



## **Harney County Forest Restoration Collaborative Public comments on the Draft Blue Mountains Forest Plan**

**Note: Comments shown below address the section of the Forest Plan in relation to the Malheur National Forest, though principles also apply to sections of the Wallowa-Whitman and Umatilla National Forests.**

### **1.) Wildland Fire: Page 26**

#### **Summary Statement:**

We agree with the desired characteristics for wildland fire. Wildfire is indeed a natural phenomenon in our Blue Mountains Forests, and fire has played a key ecological role for Dry Pine Forests east of the Cascades, which have historically been fire-resilient landscapes. We also agree with the objectives in principle and the emphasis being put on firefighter safety and expanding partnerships with local entities; however, in relation to the Malheur National Forest (MNF), 30,000 acres of fuels mitigation annually is inadequate. Given that this objective is related to what the Malheur National Forest could ecologically sustain, the Harney County Forest Restoration Collaborative believes this figure should be closer to 85,000 acres annually. This is especially true when including natural fire in this figure. This 85,000-acre figure also aligns with the historical 20-year fire return interval on the Malheur National Forest.

#### **Desired Conditions (FW-WF-DC)**

Add a desired condition that Mosaic-like patterns will exist on the landscape when wildfire works its way across a forest system in the Blue Mountains National Forests. A mosaic pattern is closely associated with lower severity fire, and allows for seed banks to restore burned areas at a quicker rate, leading to broader landscape recovery. See this [article](#) published in the ESA open-access journal that highlights the benefits of mosaic fire patterns in Dry Pine forests.

#### **Objectives (FW-WF-OBJ)**

The figures listed in the objective section should be much higher than currently listed. On the Malheur National Forest, 30,000 acres of fuels mitigation annually is not sufficient to make a meaningful difference in wildfire severity on the landscape, especially when including natural fire in this footprint. According to the [Property and Environment Research Center's](#) interactive wildfire risk map, approximately 44% of Forest Service lands in the Western United States are at "severe wildfire risk". In Oregon Congressional District 2, this figure is around 54%. This would mean approximately 918,000 acres on the Malheur National Forest are at "severe wildfire risk", and this may be higher as this statistic is for the entirety of Oregon Congressional District 2. With 30,000 acres treated annually, we would treat only around 1/3rd of fire fire-prone acreage on the Malheur



National Forest. Therefore, this figure should be around 85,000 acres annually, which would align closer to the amount of acreage on the forest at severe wildfire risk in accordance with the 20-year fire return interval.

Examples of effective fuels mitigation treatments and practices supported by the Harney County Forest Restoration Collaborative include:

- Widening the prescribed burn window by starting prescribed fires earlier in the fall.
- Being proactive in seeking additional funds to pay for mechanical treatments, and utilizing non-federal partners to do so.
- Setting a quota in acres (or miles of road) for strategic fire breaks.

### **Management Approach (FW-WF-MAPR)**

We support the focus on community protection areas and promoting fire-adapted landscapes and communities. We also applaud the move towards coordination with local entities to achieve these objectives.

## **2.) Water Quality & Aquatic Ecosystems/Riparian Management: Pages 31, 112**

### **Summary Statement:**

On the forest-wide scale for water quality and aquatic ecosystems, we appreciate the connections made to promote water quality that support healthy riparian, aquatic, and wetland systems. We support the mindful approach of building infrastructure near key aquatic areas, and we tilt our hats toward the collaborative approach suggested by working with state, tribal, and local groups via partnerships.

Regarding Riparian Management, we appreciate the comprehensive approach that the section suggests. For objectives, 6,000 acres of Riparian restoration/maintenance on the Malheur National Forest over the next decade provides a good footprint for work to get done at a meaningful scale. Actions such as silvicultural thinning and seeding/planting are particularly important for the recovery of native riparian species. We also like the adaptive approach to livestock management in Riparian Areas, specifically to maintain quality Riparian habitat and reduce streambank erosion. Using vegetation conditions and indicators as tools to guide livestock management provides a good approach that balances ecological health with economic benefits.



### **3.) Forested Vegetation: Page 36**

#### **Summary Statement:**

We support the general principles of this section in promoting diverse forest vegetation and structure, and maintaining ecological integrity for wildlife while at the same time acknowledging human use and footprints on the landscape. We believe that promoting mechanical treatments and wildlife habitat goes together, as reducing canopy cover allows for shrubs and understory vegetation to thrive, therefore supporting ungulates and other wildlife (as stated in [Forrester et. al., 2024](#)). Similar to the section on Wildland Fire, we feel that 130,000 acres per decade of mechanical treatment on the Malheur National Forest is on the low side, and may not sufficiently tackle the problem of degrading forest health, composition, and ecological integrity. We believe this figure should be a minimum of 25,000 acres annually, in order to transition the forest closer to the historical range of variability.

#### **Objectives (FW-FOR-OBJ):**

We believe that 130,000 acres per decade of mechanical treatment on the Malheur National Forest would not be enough to meaningfully improve forest health, composition, and structural/ecological integrity. Published in 2024, [one study](#) on the Malheur National Forest analyzed basal areas at locations near Crawford Creek and Lookout Mountain. Researchers found pre-treatment basal areas of 179 and 240 square feet/acre at the plot study locations. Though variable on a forest-wide scale, these metrics indicate that vast portions of the forest have catastrophically high-density levels (possibly as much as 54% of forest acreage or higher, as explained in the Wildland Fire section). Thus, to achieve management targets, the objective should be to treat a minimum of 25,000 acres via mechanical treatments annually.

### **4.) Aspen, Woodland, Shrubland, Grassland, Meadow, other non-forested habitats: Page 50**

#### **Summary Statement:**

We appreciate this section emphasizing non-forested habitats. Though small in landmass compared to general forest habitats, they are crucial in providing biodiversity and variable cover types for wildlife. We support the general objectives of maintaining these non-forested habitats in accordance with historical levels, and preventing either expansion or encroachment of undesired species within or outside these habitats. The objectives for the section should be considerably higher in acreage than currently listed.

#### **Objectives (FW-VEGNF-OBJ):**

Overall, we view the objectives of the section as quite meager, and believe the restoration footprint should be considerably higher. For instance, 200 acres of Aspen stands restoration per decade on



the Malheur National Forest seems inadequate, given the level of deterioration the habitat type is seeing (according to a [2017 study](#) done by Blue Mountains Forest Partners, Aspen occupies only 20-50% of their former range on the Malheur National Forest). In 2010, the [Damon Project](#) on the Malheur National Forest authorized 619 acres of Aspen restoration across 190 sites, consisting of both commercial and non-commercial thinning of encroaching conifer. This figure shows it is possible to restore more lofty amounts of Aspen stands over the next decade. Furthermore, the Emigrant Creek Ranger District [Environmental Assessment](#) on Aspen stands from 2023, indicates at least 3,000 acres of potential Aspen restoration on the Emigrant Creek District alone. Therefore, in order for us to make progress towards the historical range of variability where Aspen and hardwoods made up around 5% of forest vegetation, we believe 1,000-1,700 acres per year of Aspen restoration should take place forest wide.

Reducing Juniper cover to less than 10% in Sagebrush habitat on the Malheur National Forest, on 800 acres per decade seems low given the degree of Juniper encroachment across the forest. In one project implemented near Venator Creek on the Emigrant Creek Ranger District, [77 acres of Juniper thinning](#) were conducted across two separate riparian units in 2011. Another 400 acres were treated outside of the riparian areas in the same region. Furthermore, according to the Emigrant Creek Ranger District, over 9,400 acres of Juniper encroachment have been identified for possible restoration within project areas Dove, Wolf, and Upper Pine. Therefore at least 4,000 acres would be achievable, and a more meaningful footprint for Juniper reduction work over the course of a decade. We are also concerned with the lack of mention on juniper outside of sagebrush habitat, within forested vegetation and riparian areas. We believe juniper in these areas should also be addressed and included in the above acreage figure.

Furthermore, maintaining only 5 meadows (both grassy and wet meadows) per decade on the Malheur National Forest through conifer thinning seems meager, given the projection of 6,000 acres of riparian restoration over the next decade, and the presence of meadows throughout the forest. Therefore, we believe 10% of meadow acreage should be treated or maintained annually, in order to conserve and grow this habitat under stress. See this [article](#) that describes the crucial importance of wet meadows in Dry Pine Forests for the health and diversity of understory vegetation. This article also highlights the importance of having variably sized wet meadows present within Dry Pine Forest systems.



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