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Blue Mountain Forest Plan Revision Team
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Regarding: Preliminary Draft Proposed Malheur, Umatilla, and Wallowa-Whitman National Forest Land Management Plans, Project 64157, https://www.fs.usda.gov/r06/umatilla/planning/blue-mountains-forest-plan-revision

Plan Revision Team:

The Juniper Group, Oregon Chapter Sierra Club (JG) and the Bitterbrush Broadband, Great Old Broads for Wilderness (BB), are responding together to the Forest Service (FS) request for comments on the above named Preliminary Draft Proposed Land Management Plans (PDP) project (64157).

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 our national forests and other public lands.

Opening Considerations

Our records show that the FS has been attempting this project since at least 2014. An undertaking of this magnitude, three national forest land management plans covering at least 4.9 million acres, rightly should take time and careful analysis, and the public comments over these many years should be reflected in this current proposal. (Are they?)

We also know that at one time the Ochoco National Forest was attempting to be part of this work. As the Ochoco NF is in the Blue Mountain Ecoregion and is geologically part of the Blue Mountains, this makes some sense. That never happened.

While the current federal administration has forbidden agencies from using widely- and scientifically-accepted terms such as “climate change”, we are not restricted by such political mandates and will use such terms as we have, and as the FS has, for the past several decades. We hope the FS and other readers of our comments will understand our statements and if not, will look up these terms. Our comments are based upon the best available science and supporting references are easily found.

Regarding references, we can provide references for any factual statements we make. These references are most likely already available to the FS and the public in comments submitted by Oregon Wild[1], Greater Hells Canyon Council[2], Blue Mountains Biodiversity Project[3], and other organizations commenting on 64157, so repeating them herein would be redundant.

We also understand that the politicians and policy makers in D.C. do not know or have forgotten how important a wild, naturally functioning forest is to the people of Oregon and our neighboring states. We understand how industry pressure is driving many policies and directives given to the FS and this is reflected in the PDP. We represent millions of Oregonians who want their fair share of input in the management of our public lands.

Our Position

We understand that the FS, under the Department of Agriculture, must manage forests to some degree as a crop, as a tree farm. We also understand that there is a requirement for supporting the multiple-use demands of the public for our public national forests; that is, supporting non-timber activities such as hunting, fishing, hiking, camping, and more, is also part of the requirement for managing our national forests. This is especially important giving the rapidly growing demand for recreation on our public lands, along with the growing revenue and economic benefits these other activities provide. Given the global crisis of anthropogenic climate change, it is even more important that this be considered in managing our public forests, as reducing the extent of such climate change benefits all people including those involved in the timber industry. These benefits also include the immediate benefits that forests provide in non-extractive ecosystem services, such as clean air, clean water, flood control, wildlife, biodiversity, and more.

Our position is that our public forest land management plans must be for the greater good of all people, not primarily for resource extraction industries. The greater good extends beyond the current generation or even the next, but for many generations into the future.[4] This requires that the forest be ecologically healthy and functioning with the full complexity with which natural processes work, from water and nutrient cycles to plant succession. And this requires that plans look beyond the human borders of national forests to the influences and impacts management actions have on animal migrations, ecosystem services, economics, societal needs (current and future), and climate change.

1 Oregon Wild, https://oregonwild.org/
2 Greater Hells Canyon Council, https://www.hellscanyon.org/
3 Blue Mountains Biodiversity Project, https://bluemountainsbiodiversityproject.org/
4 For example, https://en.wikipedia.org/wiki/Seven_generation_sustainability

Given the statements above, our position is that the forest land management plans that are being amended must prioritize management objectives in this fashion:

1 Moderate climate change.
  1.1 Store carbon.
  1.2 Anticipate species, plant and animal, range changes.
  1.3 Protect water resources.
2 Protect and expand biodiversity.
  2.1 Allow natural ecological processes to function.
  2.2 Identify and protect connectivity corridors within and across the forest landscape.
  2.3 Expand wild areas.
  2.4 Reduce human impacts and intrusions.
3 Protect and expand non-extractive ecosystem services.
4 Manage recreational activities.
  4.1 Forest recreation is important to the people who do it.
  4.2 Recreation has local economic impacts.
  4.3 Recreation will need limits.
    4.3.1 To many people in the wild reduces the pleasure of all for being in the wild.
    4.3.2 Wildlife disturbances must be limited.
    4.3.3 Hunting and fishing regulations already manage game numbers.
    4.3.4 Manage conflicts between different groups of recreationalists.
  4.4 Recreation is opportunity for education of public about nature and ecology.
    4.4.1 Also educate by visiting burn areas.
    4.4.2 Also educate by visiting tree harvest areas.
    4.4.3 Educate by visiting riparian areas, grasslands, and other ecological areas.
5 Manage resource extraction.
  5.1 Timber is the main resource, although mining may be significant in some areas.
  5.2 Protect all old-growth and large trees.
  5.3 Plan expansion of old-growth areas.
  5.4 Determine a long-term sustainable harvest level.
    5.4.1 What is reasonable harvest level for next 500 years, given occasional disturbance events like wildfire?
      5.4.1.1 Include both timber and biomass, and other forest products.
    5.4.2 Restrict harvesting to specific areas, not the whole forest. Most of the forest must be left wild and for the other management objectives. These areas could be managed more like a plantation or tree farm than a natural forest ecosystem.
  5.5 Plan for reducing the harvest level over time and eliminating plantation and tree farm areas.
    5.5.1 The economic need for timber can be met with private forest lands.
    5.5.2 The economic, ecological, and social needs for wild public forests is growing and must be met by protecting our national forests as wild, ecologically healthy areas.
    5.5.3 The local timber economies have been degrading over many decades due to changes in forest health as well as the vagaries of international timber prices. This is beyond management control.
    5.5.4 Planning for reducing harvesting allows local businesses to plan as well, perhaps by moving emphasis from timber to recreation.

From this outline of our position, in the following we provide some substantial suggestions for improving at least some of the PDP for 64157.

Managing is Not Crucial

On page 16 of the PDP is this statement:

> "Managing vegetation is crucial to maintaining healthy forests that can withstand changes in temperature and precipitation patterns."

Given the fact that healthy forests existed for centuries prior to FS management, and given that the FS now declares forests unhealthy after just over a century under its management, this statement is irrational.

The fact is that forests are healthier without human intervention. Regarding some arguments attempting to support FS active management of forests:

- Native Americans have been modifying the forest environments for centuries prior to European arrival. True, but that management was over small areas in a less fragmented and more natural forest.
- The FS needs to fix problems from past control of fire. To reframe the above quote from page 16, "We need to cut trees to make the forest into what we think is best for the new climate." This must be questioned as the FS is still learning about natural forest processes, forest health, and climate change, and what it thinks may be best today may change with more research, and more results, tomorrow. The current science may be better today than 100 years ago, or even 20 years ago, but scientific understanding of complex forest ecosystems is still growing.
- The forest is burning up because of climate changes. This is a natural process that allows the forest to adjust to climate changes by renewing itself. This renewal takes centuries, and may mean new climax species, but it is a known process that includes plant succession and changes in the ranges of plant species that allows the forest to adapt to changing conditions.

We also point to the sentence following the one above that states how managing vegetation "supports local forest product industries." This statement points out the primary motivation of forest plan amendments is for resource extraction for economic reasons, not for healthy forests.

Healthy, productive forests are best achieved with passive management techniques.

Maintaining and Adapting to New Information

The section "Maintaining and Adapting to New Information" on page 21 describes an ongoing cycle of assessing information and adjusting land management direction in response to this new information. This is described as "adaptive management".

The term "adaptive management" could be taken as another double-speak term that obfuscates how management will be truly implemented. This could be understood to be a beneficial management style from many perspectives: For example, management could adapt to either economic demands or ecological demands. Just as the FS was directing efforts to address the ecological crises as the public demanded it most vocally in the 1970's (while the crises was developing decades prior to that), and is

now changing direction to the demands of big industry as manifested in the current federal administration.

We believe that the FS Forest Plans should be primarily guiding forest management to achieve healthy, biodiverse forests that will remain as such for many centuries. This may not meet the resource extraction objectives of the timber industry, the cattle industry, or other industries, but it will meet the needs of many recreation industries and many other facets of a multiple-use public forest.

While adapting to changing conditions is what adaptive management should mean, there needs to be a clear understanding of what can be and should be achieved using this or any management style, as well as limits on how to achieve those results, and what happens once those results are achieved.

Adaptive management must, if followed as described on page 21, adapt to new information and the best available scientific research, in order to retain forests of optimal health and biodiversity, with limited impacts from human activities. Expanding upon the section on page 21, “Use of Best Available Science”, the best science must not be limited to the few reports cited, but must include new research that comes out and the full scientific debate about management topics. For example, the theory of using the historic range of variability (HRV) to determine management actions has long been debated and is solidly countered with the need to utilize the future range of variability. What was once (in the 1990’s) a valid management direction has been superseded by this forward-looking direction.

In addition, the forest plan amendment must allow the use of passive management. That is, a light-touch or hands-off approach to much of the landscape must be allowed, encouraged, and promoted in the forest plans. This approach of using, by not interfering with, natural processes to achieve a healthy, biodiverse, resilient forest that will be around for many generation, is the best way to meet the greater good of society and the planet.

Desired Conditions

The PDP defines what the term “desired conditions” is on page 12, but in use it is fragmented between different plan components. No matter how it is presented, the desired conditions should always:

1. Maximize carbon storage to offset anthropogenic climate change.
2. Maximize biodiversity.
3. Increase non-extractive ecosystem services.
4. Manage sustainable recreational opportunities which do not conflict with any of the above.
5. Limit resource extraction activities to long-term (500 year) sustainable levels and to specific forest locations, without conflicting with any of the above.

Forest-wide Plan Components from PDP Chapter 2

Ecological Integrity

Soil (p. 24)

Maintaining soil productivity is described as a desired condition. Please add:

1. Soil building with natural processes such as added organic matter from fallen trees and other plants, active microbes, fungi, and other soil organisms, and other processes important to the nutrient cycle, are maximized.
2. Removal of organic matter with timber and biomass harvesting must not be at a level detrimental to soil building and nutrient cycling.
3. Activities which contribute to soil erosion and degradation must be limited.

While the FS Manual Chapter 2550 is cited, more emphasis on improving soil must be explicitly stated and presented as a standard.

In addition, it must be noted that soil productivity and nutrient cycling are significant to both a healthy forest and to ongoing, long-term timber production. For (we hope limited) areas in which timber production is desired for the long-term, studies must be undertaken to determine what a sustainable level of resource removal (nutrients in the form of timber) are reasonable.

Wildland Fire (p. 26)

As the scientific understanding of wildland fire continues to grow, the forest plans must be allowed to adopt to new information. While the FS admits to the error of past management directions to eliminate wildland fire from the landscape, this component of the PDP may be too restrictive to allow management to adjust to the solid and growing evidence that fuels control should be close to residential and other developments, while other fires may be better left with minimal control efforts.

The desired condition as specified appears to allow management actions across the whole forest landscape to achieve a condition of what is believed to be historic fire conditions. This ignores the fact that the ongoing drought conditions and changed climate of these areas is also affecting wildfire patterns.

The objectives only describe hazardous fuel mitigation. It needs to also state:

1. As roads increase the spread and occurrence of wildfire, road density on the landscape must be reduced and road closures implemented.
2. As firebreaks are disruptive to wildlife and increase ground fuels, firebreaks are to be implemented only along human disturbances already on the landscape.

Water Quality and Aquatic Ecosystems (p. 31)

The objectives, standards, guidelines, and management approach in this section are inadequate. The desired conditions must include:

1. Water and stream conditions that support anadromous and native fish populations.
2. Restrict vegetation actions that affect water temperature and invertebrate habitats (a food source for fish and aquatic fauna).
3. Remove and restrict grazing and roads from riparian areas.
4. Improve and maintain water table connectivity with surface waters.

Standards must be specified which include:

1. No road construction in RHCAs.
2. Closing and removing roads in RHCAs.
3. No new campgrounds or dispersed camping in RHCAs.

4. Cattle exclosures around RHCAs where grazing allotments abut or cross RHCAs.

Landscape Patterns and Connectivity (p. 34)

The presentation of desired conditions in this section is inadequate. Dry forest structure also occurs at coarse grained spacial patterns and includes old forest, scablands, and rocky outcroppings. Cold and moist forest structure also includes woodlands. All forests also include variations in vegetation due to aspect and slope, as well as canyons and elevation.

It is important that this section mentions spacial and temporal scales, as it does, along with connectivity with lands of other ownership, as it does. Connectivity within and across national forests is important for many reasons, as stated in our Position statement (page 2, above).

The objections in this section, page 35, only mention removing fencing. It needs to also include:

1. Remove and close roads.
2. Close areas to reduce wildlife disturbance during breeding and migratory seasons.

Forest Vegetation (p. 37)

It is important that the statement given in this section, “natural range of variation is a guide”, be taken seriously in forest management actions. As a guide it has some use, but best available science demonstrates that the future range of variation is the proper management guide for any actions.

The PDP mostly uses the term “range of variability” (RV) or variations of that term. In this document, we use the term Historic Range of Variability (HRV) to make it clear that this refers to past vegetative variability, not current or future variability. We understand that the PDP use of the term “natural range of variation” and “RV” both refer to HRV, as is described by Powell whose white paper[5] is referenced by the PDP on page 37.

The desired conditions should state:

1. Ecological integrity.
2. Maximum biodiversity, including diverse vegetation.
3. Functioning nutrient cycles.
4. Functioning plant succession.

The objective thus must be modified to state:

1. Passive management of forest vegetation is preferred to other actions.
2. Active management of some areas may be used to move vegetation groups toward the forecasted future range of variability.
3. Active management is appropriate close to private lands with residential developments to reduce dangers to the public.

5 Powell, David C. 2014. *Range of Variation Recommendations for Dry, Moist, and Cold Forests*. White Paper Nos. F14-SO-WP-SILV-3. USDA Forest Service. The PDP references an earlier version which is unavailable to the public.

Species Diversity (p. 54)

The objectives for this section only mention completing projects for maintaining or restoring habitat. These objectives must also include:

1. Manage timber and biomass extraction at limits that allow for debris for soil building and habitat for insects and other invertebrates that support other wildlife.
2. Reduce habitat fragmentation caused by roads.
3. Reduce wildlife disturbance by motorized vehicles and overuse of all forms of human presence.

Standards must include:

1. Grazing will be limited to allow native species diversity to grow.

Social and Economic Sustainability

Local Communities (p. 64)

We understand how local communities have been built based upon the timber economy. An economic base like this shifts due to international markets and over-harvesting of the resource, as well as changing societal interests which are now more recreational and wildlife conservation of our limited forest resources. As such, the PDP must look at reducing past timber harvest levels to levels that are truly sustainable and will be reduce over the coming decades, so that communities can also make this transition over time.

Healthy, intact forests provide sustainable economic value far beyond what logging or mining can extract. Clean water supplies, healthy fisheries, and outdoor recreation are the foundation of sustainable economies in rural and urban communities in the Blue Mountain region. Extractive industries externalize costs, leaving taxpayers to pay for road maintenance, sediment cleanup, and degraded water supplies. With a road system already twice the size of the interstate highway system and chronically underfunded, the Forest Service cannot and does not maintain the roads it already has. Adding more roads for more extraction will drain public resources while benefiting only a few corporations. Our public lands lands belong to all of us. They are financed by our tax dollars and held in trust for future generations. We emphasize that management of public lands must also provide clean water, biodiversity, recreation, carbon storage, cultural and family traditions, and peace of mind—benefits that no other landscapes can provide at the same scale.

Transportation Infrastructure (p. 65)

The PDP states, in part, “transportation system and its use support ecological sustainability”[6]. In order to achieve this desired condition, the PDP needs to state that reducing the miles of open roads is important to achieve:

- Reduced wildlife disturbance.
- Reduced habitat fragmentation.
- Reduced wildfire ignitions.
- Improve water filtration and reduce sediment runoff.
- Reduce the spread of invasive and noxious weeds.
- Reduce vehicle pollution.

6 Desired Conditions (FW-TRSPT-DC), p. 65.

The PDP must point out the many negative impacts that roads have on a forest. Road impacts include increased fire risk, increase in invasive plants, increased (legal and illegal) firewood cutting, increased poaching, increased off-road traffic, increase legal killing of wildlife, decreased habitat connectivity, soil impacts, increased sediment and runoff, higher water and air temperatures, increased evaporation and drying of soil and fuels with more openings for wind and sun, and reduced security habitat for elk and other species. These are only a few of the reasons to severely limit roads in our public lands.

These important considerations to managing transportation infrastructure "to avoid or mitigate undesired effects to ecological integrity" (p. 65) must be explicitly stated in forest plans. Additional objectives which must be added to those listed (p. 66):

- Reduce road maintenance miles.
- New road construction should be avoided.
- Temporary roads must be closed and obliterated within 2 months of the end of a project.

The opening and creation of temporary roads, in addition to disturbing and fragmenting habitat, significantly increases the amount of sediment delivered into streams.

Point FW-TRSPT-DC 04 on page 65 needs to be qualified that trail accommodation of "motorized and non-motorized needs" must be restricted when "ecological sustainability" and "ecological integrity" would be threatened.

The objectives (FW-TRSPT-OBJ) for road and trail maintenance need to have those numbers justified. As stated, the miles given seem to be high values without reasonable justification.

Management approaches (FW-TRSPT-MAPR) page 67 must include using the desired conditions of "ecological sustainability" and "ecological integrity" when considering transportation routes, experiences, and possible re-routes and closures. The ecological sustainability of the forest is paramount to user experiences and overall forest health.

Inventoried Roadless Areas (IRA) are discussed in the PDP, and include the desired condition (MA2A-IRA-DC) point 02 to maintain existing motorized trails and roads. Rather, the desired condition should be to close and remove from maintenance all motorized roads and trails in IRAs.

Minerals, Energy, Geology (p. 85)

These plan components are a huge threat to our national forests.

- Mineral extraction by any method kills the forest by clearing surface areas, road building, utilizing limited water supplies, and pollution from vehicles and humans, as well as mining tailings and runoff.
- Energy development of any kind is development on natural forest lands along with road building and pipeline or power line construction. Again, pollution occurs from vehicles and humans involved in the construction and operation of any energy facility.

The PDP attempts to minimize these effects with consoling language, but without strong standards that are enforced, this resource extraction will be very detrimental to the landscape and for other uses of our public forests. The desired conditions state that this extraction will "provide for ecological integrity"

and make other statements desire almost harmless resource extraction along with economic benefits from this development. This is laudable, but history demonstrates this is not achievable.

In order to achieve anything close to what we believe the desired condition should achieve (see p. 5, above) the standards for this plan component must include:

1. Minimal road construction with controls for runoff, no building in RHCA, no to minimal stream crossings.
2. Minimize areas needed for facility construction.
3. Strict control of tailings and runoff.
4. High quality restoration of site and roads when work completed.
5. Minimize wildlife disturbance, especially during birthing and migrating seasons.

Management Area Plan Components from PDP Chapter 3

Inventoried Roadless Areas (p. 100)

While the PDP appears to protect the 722,195 acres of IRA identified on the three forests per the existing rules for such management area land designations, we encourage the FS to take strict measures to protect the ecological integrity of these areas. We request the forest plans:

1. Close motorized trails in IRAs.
2. Close roads in IRAs.
3. Stop maintenance on motorized trails and roads in IRAs.

Such actions would save taxpayer money and would increase the enjoyment and opportunities for non-motorized recreation in our public national forests.

Riparian Management Area (p. 110)

The PDP describes Riparian Management Areas (RMA) in 4 categories:

1. Fish-bearing streams
2. Perennial flowing non-fish-bearing streams
3. Natural lakes and ponds
    1. Constructed ponds and reservoirs
4. Seasonally flowing or intermittent streams, wetlands, seeps and springs

The area of the RMA contains a width specification generally:

> “the edges of the active stream channel to the top of the inner gorge, or to the outer edges of the 100-year floodplain, or to the outer edges of riparian vegetation, or to a distance equal to the height of two sitepotential trees, or 300 feet slope distance (600 feet total, including both sides of the stream channel), whichever is greatest”

The Guidelines, starting on page 113, offer too many exceptions to grazing management, which is known to be highly degrading to stream habitats. Grazing allotments in RMAs must be severely limited with minimal access for cattle to streams and stream banks. Alternative locations for allotments outside of RHCAs must be found.

Similarly, protection of water and riparian resources must take precedence over mineral extraction activities.

Appendix A devotes many pages to how RMAs should be analyzed and the theoretical strategies to restoring watersheds. The current conditions of forest watersheds indicate historical negligence of the FS in these areas.

In Appendix B, Ecological Integrity, Aquatic and Riparian Ecosystems, page 174, some solid and good management activities are stated. What is missing is restricting grazing and mining activities, as well as restricting motorized vehicle crossings.

Conclusions

The PDP has an emphasis upon the economic uses of our public national forests. This conflicts with the multiple-use demands of the majority of the citizens of this land. While it is difficult to manage public lands for the many uses the public desires, it is not impossible.

The PDP ignores or minimizes long-term planning. Planning for multiple generations of use is difficult, but not impossible. Emphasizing the benefits of natural, wild forests with fully functioning ecosystems, benefits that are felt now as well as by great-great-grandchildren and beyond, would go a long way toward achieving the best future conditions.

We have highlighted in this document many of the areas that concern us in the PDP. We look forward to the chance to make many more substantial comments at the next stage of this process allowing public input to management of our public lands.

Sincerely,

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