United States Forest Service
Umatilla National Forest Supervisor's Office
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Attn: Blue Mountains Forest Plan Revision
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Submitted via: https://cara.fs2c.usda.gov/Public/CommentInput?Project=301397

RE: Comments on Draft Environmental Impact Statement and Revised Forest Plan for the Blue Mountains.

Dear Forest Service: August 17, 2026

Blue Mountains Forest Partners (BMFP) is a diverse collaborative focused on the Malheur National Forest. Its members include conservation advocates, forest-products interests, scientists, contractors, local residents, and others who have worked together since 2003 to improve the resilience and well-being of forests and communities in the southern Blue Mountains. BMFP was formed in response to earlier forest plan revision efforts and has spent more than two decades building scientific consensus and social license for active ecological restoration.

BMFP's work is intentionally neither a no-management program nor a timber-production program. It is a framework for restoring fire-adapted forests while conserving old trees, special habitats, aquatic systems, and wildlife; sustaining local restoration capacity; and learning through monitoring and adaptive management. BMFP documents difficult consensus in its Zones of Agreement (ZOAs), which synthesize western science, local research, field experience, and negotiated sideboards.

BMFP has repeatedly provided this information to the Forest Service throughout the revision process. Our May and November 2024 Assessment comments referenced BMFP's ZOAs, Malheur-specific research, and comments on the prior revision efforts. BMFP specifically requested an action alternative for the Malheur National Forest that used the ZOAs as a basis for plan components and offered to work with the planning team to develop it. BMFP again emphasized these points during scoping in October 2025.

BMFP appreciates that the Assessment reports generally recognized the need to restore ecological integrity, increase resilience to fire and climate stressors, and modernize the 1990 plan. BMFP also supports active restoration, prescribed fire, commercially supported treatments where ecologically appropriate, and an effective local workforce and wood products infrastructure. Our concern is not whether the Forest Service should proactively manage the Forest; instead, our concern is whether the Proposed Plan contains enough scientifically grounded direction, measurable outcomes, and accountability to ensure that management produces the ecological and community benefits used to justify it.

The Draft Environmental Impact Statement (DEIS) and Proposed Plan preserves a recognizable *narrative* from the Assessment to the proposed action: the Blue Mountains are departed from

reference conditions; fire exclusion and altered composition and density have increased vulnerability; active restoration is needed; and the revised forest plan should be flexible enough to accelerate implementation. But the documents do not preserve a comparably traceable *decision framework* that will address the narrative carried forward from the Assessment: detailed Assessment findings and locally developed restoration methods are repeatedly compressed into broad Desired Conditions, optional Management Approaches, project-level mitigation, and activity-counting – rather than objectively measurable progress towards Desired Conditions. As drafted, the plan components are unlikely to achieve the stated Desired Conditions and outcomes promised.

The resulting framework gives the Forest Service substantial discretion to increase treatment and timber production, but provides little assurance that the agency will conserve irreplaceable old trees, restore rare habitats, maintain species persistence, protect aquatic systems, or adapt when assumptions prove wrong. For example:

- The DEIS often treats increased acres treated and timber volume as evidence of ecological progress without providing equally concrete outcome measures or adaptive triggers;

- Alternative 2 removes or weakens old- and large-tree safeguards and relies on project-level findings and nonbinding Management Approaches to prevent ecological harm, contradicting the Forest Service's 2012 Planning Rule;

- The Proposed Plan recognizes severe aspen decline but fails to include plan components to address it;

- The species-diversity framework depends heavily on coarse-filter ecosystem direction and future project mitigation, while failing to clearly demonstrate how Species of Conservation Concern (SCC) and other species-specific needs will be secured at the plan scale; and

- The monitoring program is not sufficient to test central assumptions, determine whether desired conditions are being achieved, or trigger meaningful management changes.

These concerns implicate the 2012 Planning Rule's requirements for the use and documentation of best available scientific information (BASI); collaborative participation; integrated plan components designed to maintain or restore ecological integrity and species diversity; measurable Objectives; Standards and Guidelines sufficient to constrain projects; and a monitoring program capable of evaluating status, progress, effectiveness, and changing conditions.

We offer the following comments to improve the Proposed Revised Plan and its associated environmental impact statement (EIS). We also provide proposed plan components as Attachment A that convert BMFP's ZOAs to plan components suitable for inclusion in the Final Revised Plan.

I. Cross-Cutting Analytical and Planning Deficiencies.

A. The Proposed Plan Neither Reflects Assessment Conclusions Nor Adequately Responds to the Need for Change.

The Assessment reports contain detailed resource evaluations, and the preliminary Need for Change then distills those diagnoses into high-level themes: ecological integrity, wildfire resilience, climate adaptation, aquatic restoration, social and economic sustainability, and flexible implementation. Those themes are appropriate, but the Proposed Plan does not clearly show which of these findings require binding Standards and/or Guidelines, measurable Objectives, project-level treatments, or those that must be monitored.

This is especially important because the Need for Change states that revised plans should focus on outcomes rather than outputs and should use integrated, flexible, and adaptable components informed by local knowledge and BASI. The Proposed Plan often does the opposite in practice: Desired Conditions remain general and undefined; Objectives count actions rather than proscribing a time certain for achievement of Desired Conditions or measurable project towards them; and operational safeguards are deferred to later project analysis. The 2012 Planning Rule does not allow project-level decisions to fulfil Rule-level requirements. 36 C.F.R. § 219.2(c) ("Except as provided in the plan consistency requirements in § 219.15, none of the requirements of this part apply to projects or activities").

A forest plan need not prescribe every project decision. But strategic planning is not synonymous with noncommittal planning. The Planning Rule identifies distinct functions for Desired Conditions,[1] Objectives, Standards, Guidelines, Suitability, and Monitoring. A plan that relies mainly on broad Desired Conditions and optional Management Approaches risks eliminating the very framework needed to make future projects consistent, efficient, and durable.

B. The Agency Did Not Meaningfully Translate Collaborative Outcomes Into the Proposed Plan.

BMFP repeatedly asked the Forest Service to use our ZOAs as a basis for Malheur plan components and an action alternative. The DEIS does not analyze such an alternative. Nor does it explain, topic by topic, whether ZOA provisions were adopted, rejected, or considered unnecessary.

This omission is analytically important. Without a ZOA-based alternative, the DEIS compares conventional poles that BMFP has worked hard to move past: a high-output, high-flexibility active-management alternative vs. an active-management alternative with additional conventional constraints. It does not evaluate the distinct planning approach BMFP proposed: high levels of active restoration bounded by locally developed, science-based, outcome-oriented direction.

[1] "A desired condition is a description of specific social, economic, and/or ecological characteristics of the plan area, or a portion of the plan area, toward which management of the land and resources should be directed. *Desired conditions must be described in terms that are specific enough to allow progress toward their achievement to be determined*, but do not include completion dates." 36 C.F.R. § 219.7(e)(1)(i) (emphasis added).

The 2012 Rule does not require the agency to adopt our collaborative recommendations, but it does require meaningful opportunities for participation and encourages collaboration throughout planning. Where the agency possesses unusually mature, relevant, and science-informed consensus products, a reasoned process should show how those products influenced plan development. The current plan does not do so.

C. Increased Timber Volume ≠ Increased Ecological Resilience.

BMFP supports increasing the pace, scale, and quality of forest restoration on the Malheur National Forest that increases community socioeconomic wellbeing. Alternative 2 emphasizes active management, larger treatment objectives, greater timber output, increased operational access, and fewer constraints. Alternative 3 retains the active-management premise but adds selected tree-retention, riparian, roadless, and other restrictions.

The DEIS repeatedly characterizes Alternative 2 as achieving desired conditions faster because it treats more acres and encounters fewer constraints. That comparison assumes that treatment quantity is a reliable proxy for ecological progress. It does not adequately test whether the alternatives differ in treatment quality, treatment placement, retention of key habitat elements, post-treatment trajectories, or the likelihood that short-term impacts will be repaired. Nor does it meaningfully compare alternative monitoring and adaptive-management architectures.

Indeed, there is scant effects analysis contained anywhere in the draft EIS. While BMFP is aware that the Department of Agriculture recently revised its procedures implementing the National Environmental Policy Act (NEPA), those new regulations do not allow the Forest Service to forgo an analysis of the direct, indirect, and reasonably foreseeable future consequences of major federal actions. *See*, 7 C.F.R. § 1b.11(12) (definition of "effect" or "impact") ("Effect or impact means changes to the human environment from the proposed action or action alternatives that are reasonably foreseeable and have a reasonably close causal relationship to the proposed action or alternatives"). Here, the agency has failed to demonstrate that merely increasing timber production and increasing agency flexibility will result in increased ecological integrity of the Malheur National Forest and the socioeconomic sustainability of rural communities dependent on that ecological integrity to produce goods and services.

BMFP's primary objective with respect to the revised forest plan is that the Forest Service develop a new plan that is *implementable*. We strongly believe that the best way to achieve that objective is to use the best available science and local collaborative capacity to increase the pace, scale, and quality of forest restoration on the Malheur.

The Forest Service has developed the proposed action during an administration-wide effort to increase federal timber production, reduce project delivery time, decrease timber supply uncertainty, expand timber sales, and eliminate perceived burdens on timber production. That policy context does not establish that every plan component is unlawful or that active management lacks ecological value. It does, however, make it important for the DEIS to separate ecological assumptions from production objectives and to demonstrate that predicted ecological benefits do not simply follow from higher output.

Executive Order 14225 directed USDA and DOI to facilitate increased timber production, set federal timber-sale targets, streamline ESA review, consider categorical exclusions, and suspend or revise actions that impose an undue burden on timber production. The DEIS should therefore be especially transparent about whether Alternative 2's treatment and output levels arise from ecological need, administrative production targets, assumed industry capacity, or some combination thereof. It should also evaluate whether operational flexibility could shift project design toward commercially-feasible acres and away from ecologically highest priority work, including noncommercial treatments, transportation system maintenance, special habitat restoration, and long-term maintenance treatments.

D. Management Approaches are Speculative and May Not Achieve Desired Conditions.

The Proposed Plan repeatedly places important implementation concepts in Management Approaches. Management Approaches may be useful explanatory material, but they are not plan components and do not establish project consistency requirements. Where the DEIS relies on a Management Approach to predict that adverse effects will be avoided, minimized, monitored, or corrected, the analysis overstates the regulatory certainty the plan component actually provides.

For example, Management Approaches pertaining to old-tree decision processes, elk retention on public lands, collaboration, adaptive management, genetic material coordination, and project design considerations for species are *optional* plan content and therefore cannot provide the regulatory certainty required by the Planning Rule. 36 C.F.R. § 219.7(f)(2).[2] Where these measures are necessary to support the effects conclusions, the Forest Service must convert them to Standards, Guidelines, or Objectives.

E. Monitoring Is Weighted Toward Implementation Outputs Rather Than Ecological Outcomes.

The monitoring program tracks several important conditions and includes some effectiveness questions. But many central revised plan assumptions are not paired with complete, outcome-

[2] Management Approaches are described in the Forest Service Handbook (FSH):

> If used, management approaches would describe the principal strategies and program priorities the Responsible Official intends to employ to carry out projects and activities developed under the plan. The management approaches can convey a sense of priority and focus among objectives and the likely management emphasis. Management approaches should relate to desired conditions and may indicate the future course or direction of change, recognizing budget trends, program demands and accomplishments. Management approaches may discuss potential processes such as analysis, assessment, inventory, project planning, or monitoring. *Use care not to create unrealistic expectations regarding the delivery of programs*.

FSH 1909.12.22.4 (emphasis added). Management approaches are not plan components but rather optional plan content and therefore do not constrain or compel agency action in any way. 36 C.F.R. § 219.7(f)(2). Management approaches can be administratively changed with only public notice: public *comment* is not required. *Id*. at § 219.13(c)(2). We also note that the Forest Service is currently in rulemaking to revise the Directives and Forest Service Handbook: this particular FSH section is an example of where the Directives provide important direction to field staff regarding the 2012 Planning Rule and therefore should be retained.

based indicators. The program more readily measures widgets such as acres treated, projects completed, timber offered, and authorized uses rather than outcomes such as whether ecological integrity, habitat security, recruitment, resilience, or species persistence improve.

The distinction is critical. An implementation measure asks whether the agency acted; but an effectiveness our outcome-based measure asks whether the action *worked*. A plan built around unprecedented flexibility and increased timber production requires a correspondingly strong effectiveness program because future projects will rely on the plan's assumptions and because corrective learning is the principal justification for broad discretion.

The monitoring program should be revised to effectively detect and compel implementation adaptation when, for example: old-tree mortality is increasing; treated stands are not moving toward desired composition and density; aspen treatments fail to recruit stems above browse height; road and recreation pressure displace elk; riparian treatments fail to improve hydrologic or habitat function; or accelerated treatment produces cumulative short-term losses that exceed expected recovery. *See*, Attachment A for how this can be accomplished in the Final Revised Plan.

II. Resource-Specific Comments.

A. Forest Vegetation, Old and Large Trees, and Restoration Trajectory.

BMFP supports active thinning and prescribed fire to restore frequent fire forests and reduce competition around old trees. Local research supports the proposition that mechanical thinning can improve residual-tree growth and restore ecological functions, particularly when paired with prescribed fire. BMFP has also explained in our ZOAs that a fixed diameter limit can impede restoration where large, relatively young, shade-tolerant trees are ecologically inappropriate.

Alternative 2 allows removal of old and large trees under broad circumstances and relies in significant part on project-level findings and nonbinding Management Approaches.[3] This is inconsistent with the 2012 Planning Rule that requires forest plans – not projects – to demonstrate compliance with the Rule, and is also entirely unacceptable because this Guideline will not result in increased old tree recruitment over time, something the Assessment identified as a critical need. The DEIS predicts that Alternative 2's increased pace will reduce high-severity fire risk and improve long-term habitat, while acknowledging greater short-term effects. The analysis does not adequately quantify the amount, location, duration, or recoverability of losses of large tree habitat, canopy heterogeneity, snags, down wood, or associated species habitat. Nor does it clearly identify ecological thresholds that accelerated treatment may not cross.

The Planning Rule requires plan components maintain or restore ecosystem integrity, including structure, composition, function, and connectivity, while accounting for system drivers and stressors. *See*, 36 C.F.R. §§ 219.8, 219.9. The current Proposed Plan lacks these components. A

[3] Alternative 3 adds retention Guidelines for grand fir over 30 inches and other species over 21 inches, subject to exceptions, but still uses diameter as a rough proxy and does not fully incorporate BMFP's age- and ecology-based approach.

generalized promise to move vegetation toward desired conditions is not a substitute for direction addressing irreplaceable structures whose recovery may take centuries.

B. Fire, Fuels, Climate, and the Limits of Treatment-Based Predictions.

The Fire Assessment correctly recognizes fire as an ecosystem process and identifies the effects of fire exclusion, altered stand density, accumulated fuels, weather, topography, vegetation, and climate. The DEIS nevertheless tends to present treatment acreage as a straightforward route to reduced high-severity fire risk and increased resilience.

That prediction requires greater qualification. Treatment effectiveness is spatially and temporally contingent; prescribed fire and maintenance are essential; extreme weather can overwhelm treatment effects; treatment can create short-term ecological impacts; and not all acres contribute equally to community protection or ecosystem resilience. Mechanical treatment is also not interchangeable with fire as an ecological process.

The plan should distinguish among community protection treatments, ecological restoration treatments, strategic fuel treatments, and commercial timber objectives. Monitoring should evaluate whether treatments change subsequent fire behavior and ecological outcomes, not simply whether acreage targets are met. The DEIS includes a fire effectiveness monitoring concept, but the Proposed Plan's broader effects analysis still relies too heavily on the assumption that more treatment necessarily means more resilience without demonstrating the effectiveness of this premise.

Climate change further increases uncertainty. The Planning Rule requires the responsible official to consider climate change and other stressors. A robust revised plan would identify where Desired Conditions are based on historical reference conditions, where future climate-adjusted conditions may be necessary, and how monitoring will identify directional change or failed assumptions. The current draft plan lacks these provisions.

C. Aspen and Other Unique Habitats.

The Terrestrial Ecosystems Assessment describes aspen as uncommon, biologically rich, and in low ecological integrity because of conifer encroachment, fire exclusion, browsing, small stand size, failed recruitment, and climate-related moisture stress. On the Malheur, the Assessment identifies approximately 1,327 stands, with a median size below one acre and only a small proportion larger than ten acres.

BMFP's Aspen ZOA supplies a practical restoration architecture. It recognizes the full 100- to 150-foot sprouting zone; prioritizes stand expansion rather than preservation of current stems alone; distinguishes large from old competing conifers; identifies browsing thresholds and protection methods; addresses grazing timing, fencing duration, and fence maintenance; calls for mapping and landscape sequencing; recognizes hydrologic impairment as a potential limiting factor; and addresses genetic diversity and seed-origin stands.

Our ZOAs also provide monitoring indicators and triggers for adaptive management. For example, where browsing affects 50 to 100 percent of suckers and no stems are recruiting above the six- to eight-foot browse zone, the framework links a measurable condition to fencing, deterrents, rest, or altered grazing. It also recognizes that fire or coppicing can reinitiate stands but may eliminate overstory habitat for decades, requiring landscape sequencing and protection of new suckers.

The Proposed Plan reduces this information to a broad Desired Condition, a Malheur-specific Objective of restoring approximately 200 acres per decade, one general Guideline concerning conifer encroachment, and optional Management Approaches. The Objective equates to roughly 20 acres per year, but the DEIS does not explain why that rate is adequate relative to the number, condition, and rate of decline of aspen stands on the Malheur; and this target is woefully inadequate given the ecological need. It also does not define when an acre is successfully "restored."

The monitoring program principally asks what actions occurred and how many acres were affected. It does not require aspen-specific indicators such as stand area, sucker density, browse percentage, recruitment above browse height, age and structure, conifer reinvasion, fence condition, hydrologic function, or persistence after drought and fire. The Proposed Plan therefore risks counting treatment as restoration even when recruitment fails. That approach is inconsistent with the Need for Change's stated shift from outputs to outcomes and does not satisfy the Rule's requirements for ecosystem integrity, unique habitat, species diversity, and monitoring effectiveness. Attachment A includes monitoring questions, thresholds, and triggers that should be incorporated into the Final Revised Plan.

D. Elk, Security Habitat, Roads, and Displacement onto Private Lands.

The Wildlife Assessment and DEIS recognize that elk use is influenced by forage quality, proximity to hiding or security cover, distance from open motorized routes, seasonal road use, and traffic frequency. These sources also recognize that reducing disturbance during hunting seasons can help retain elk on National Forestlands, consistent with the best available science generated by the Starkey Project and related Blue Mountains research. Likewise, BMFP's Wildlife ZOA treats elk and mule deer as meso-filter concerns because actively used open roads can prevent animals from accessing otherwise suitable habitat. The ZOA integrates forage, cover, road use, seasonal disturbance, and spatial arrangement rather than relying solely on the old thermal-cover hypothesis or HEI found in the current forest plan.

Current science does not establish that roads are unimportant; instead, it establishes that a simple miles-per-square-mile road-density value is *incomplete* because road location, distance, traffic, season, vegetation, and topography matter to elk. That is a basis for a better disturbance framework, not for eliminating road-related direction as does the Proposed Revised Plan.

Alternatives 2 and 3 contain *no* road density requirements or specific open road reduction goals. The DEIS states that those alternatives will instead emphasize nutrition, forage, cover, structure, and ecological integrity. The Proposed Plan's only express provision aimed at retaining elk on

public lands is an optional Management Approach advising managers to consider vegetation projects that encourage that outcome.

This is an analytical non sequitur and markedly inconsistent with the BASI pertaining to elk management. The fact that road density alone is insufficient does not support removing all enforceable road-and-security direction. Nor does improved forage necessarily benefit elk if traffic and recreation make that forage functionally unavailable. Treatment may create attractive forage near open routes while increasing access, hunting pressure, or displacement.

The foreseeable social consequence is also relevant. Elk displaced from public lands may move toward lower-elevation private lands, where crop depredation and conflict with landowners increase. The 2012 Rule requires integrated consideration of ecological, social, and economic sustainability; the DEIS does not adequately analyze this public-private landscape relationship.

The omission is particularly consequential because Region 6 suspended NEPA travel-management proposals that decrease public access, and the Malheur stated that the plan revision would not change access and that project-level road reductions were also suspended except in limited circumstances. At the same time, that regional memorandum acknowledges that Travel Management Rule Subpart A still requires identification of the minimum road system using science-based roads analysis.

Thus, the Proposed Plan defers road designation to later travel planning (that may never occur) while current policy discourages the very access reductions that the elk science may require. The DEIS cannot reasonably predict improved elk distribution without addressing that constraint. The Forest Service must revisit this section of the Proposed Plan and incorporate plan components that reflect the BASI pertaining to elk management.

E. Species Diversity, SCC, Focal Species, and Wildlife Habitat.

The Planning Rule requires a complementary ecosystem and species-specific approach: ecosystem plan components must maintain or restore ecological conditions for ecosystem integrity and diversity; where those components are insufficient, additional species-specific components must provide the ecological conditions necessary to maintain viable populations of SCC within the plan area. BMFP's Wildlife ZOA was expressly organized around the same coarse-, meso-, and fine-filter logic. It identifies species and habitat elements that may not be adequately secured through broad vegetation desired conditions, including Pacific marten, old-tree and snag structures, road-sensitive elk and mule deer, and special habitats.

The DEIS relies heavily on broad ecological integrity components and future project-level mitigation while frequently asserting that law, regulation, policy, and plan direction will avoid crossing persistence thresholds. It does not consistently identify the threshold, the evidence that coarse-filter direction is sufficient, or the operative plan component that prevents the threshold from being crossed.

The Proposed Plan also needs a better treatment of landscape permeability. Static connectivity corridors can be ecologically inappropriate where dense stands are vulnerable to drought, insects,

and severe fire. But replacing corridor prescriptions with broad landscape pattern Desired Conditions is not enough: the Proposed Plan should explain how treatments will maintain functional movement through the landscape and how monitoring will test permeability (something that will be difficult if not impossible without related road management plan components). In turn, the monitoring program must identify Focal Species whose status informs ecological conditions and the effectiveness of plan components, and explain why selected Focal Species are responsive, monitorable, and representative of relevant ecological conditions. The Forest Service cannot defer this core program design to a later, undefined process.

F. Aquatic and Riparian Systems, Roads, and Whole Watershed Restoration.

The Assessment recognizes widespread departure in aquatic and riparian conditions, sediment and aquatic organism passage effects from roads, altered hydrology, and the need for whole watershed restoration. BMFP's Integrated ZOAs support active riparian restoration including conifer removal where ecologically appropriate; riparian hardwood recovery; large wood placement; beaver-based restoration; road stabilization or relocation; improved crossings; and integration with upland, fire, recreation, and road management. BMFP also emphasizes that ecological restoration must be the overriding objective near streams and wetlands.

Alternative 2 provides restoration Objectives and broad Desired Conditions but fewer enforceable inner zone constraints than Alternative 3. Alternative 3 adds enhanced inner zone protection but may use generalized buffers that do not fully reflect local ecological variability or BMFP's whole watershed approach.

The DEIS primarily frames the difference as greater restoration opportunity under Alternative 2 versus greater short-term protection under Alternative 3. That framing misses the more useful question: what combination of site-specific restoration, no-cut or limited treatment areas, hydrologic priorities, road actions, and monitoring best restores function while protecting sensitive features? The alternatives should distinguish ecological restoration from commercially-driven entry and should analyze cumulative short-term effects where accelerated upland and riparian treatments overlap.

G. Social and Economic Sustainability and Implementation Capacity.

BMFP supports sustaining the workforce, mills, contractors, prescribed fire capacity, and partnerships needed for restoration. But the DEIS should not assume that larger acreage and output Objectives are reasonably foreseeable simply because the plan authorizes them.

BMFP's Assessment comments questioned the prediction that restoration pace would increase without corresponding investments in agency staff and capacity. The Proposed Plan includes large decadal Objectives but do not clearly disclose the staffing, funding, contracting, prescribed fire windows, monitoring capacity, or maintenance obligations needed to achieve them. This matters for both NEPA and Planning Rule consistency. Objectives must be concise, measurable, and time-specific, but they also reflect reasonably foreseeable budgets. 36 C.F.R. § 219.7(e)(1)(ii). If the agency can accomplish only the commercially lucrative portions of a program, the ecological integrity trajectory will differ materially from a plan that assumes

balanced implementation of thinning, fire, road, aquatic, special habitat, and monitoring work. The final EIS and Revised Plan must address and resolve this issue.

III. Specific 2012 Planning Rule Concerns.

The following deficiencies should be addressed in the final revised plan and EIS:

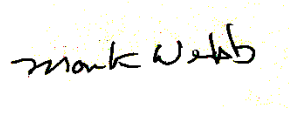
Rule requirement	Relevant concern	Examples
§ 219.3 — BASI.	The responsible official must use BASI and document how it was determined, applied, and considered. The record does not clearly show how Malheur-specific research and BMFP's science syntheses affected plan components or why key ZOA provisions were omitted.	Aspen thresholds; old tree age/diameter distinctions; elk road and traffic science; marten and habitat filter analysis.
§§ 219.1(c), 219.4 — Participation and Collaboration.	The agency repeatedly received highly specific collaborative products but did not analyze a ZOA-based alternative or provide a transparent crosswalk showing adoption, rejection, or modification of ZOA provisions.	BMFP repeatedly requested a Malheur ZOA alternative and offered to assist in its development; but the agency has rebuffed these persistent offers without explanation in the record.
§ 219.7(e) — Plan Components.	Desired Conditions, Objectives, Standards, and Guidelines have distinct functions. Important measures are placed in nonbinding Management Approaches or deferred to projects, which is inconsistent with the requirements of the Planning Rule.	Old tree decision process; elk retention on public lands; collaboration; monitoring and adaptive management responses (triggers); project mitigation for SCC.
§ 219.7(e)(1)(ii) — Objectives.	Objectives should be concise, measurable, and time-specific. Activity measures are not sufficient where success depends on ecological outcome.	Aspen 200 acres/decade without success criteria; treatment acre objectives without trajectory metrics.
§ 219.8 — Sustainability and Ecological Integrity.	Plan components must maintain or restore integrity, considering structure,	Treatment quantity substitutes for outcome; old tree and unique habitat

	composition, function, connectivity, drivers, and stressors, including climate.	recovery are not adequately bounded; climate-adjusted trajectories are unclear.
§ 219.9 — Ecosystem and Species Diversity.	The agency must demonstrate that coarse-filter components are sufficient or provide species-specific components for SCC viability.	Reliance on future mitigation; unclear SCC selection and persistence thresholds; marten omission; road-sensitive elk concerns are unaddressed by draft plan components.
§ 219.10 — Integrated Resource Management and Multiple Uses.	Multiple uses must be integrated with ecological sustainability; timber production is not an overriding use.	Alternative structure and rejected alternative rationale overstate timber's legal primacy; access and timber objectives are more operational than ecological safeguards.
§ 219.12 — Monitoring.	The program must address changing conditions, progress, effectiveness, Focal Species, and climate.	Project-heavy monitoring; incomplete indicators; no aspen recruitment or elk/road effectiveness monitoring; unclear focal species monitoring provisions.

IV. Conclusion.

BMFP supports a proactive, implementable, and durable revised forest plan: indeed, our organization was created out of the disfunction of a prior forest plan revision effort nearly 25 years ago. We are concerned that while the Proposed Plan reflects our ambition for accelerated restoration, it does not build in enough of the scientific and collaborative architecture needed to keep that restoration ecologically grounded, socially durable, and legally accountable. Durable flexibility is *disciplined discretion*: clear objectives, ecologically meaningful sideboards, measurable outcomes, monitoring that tests assumptions, and adaptive responses when anticipated benefits do not occur. The proposed plan lacks these components, undermining the objective of proactive, implementable, and durable revised forest plan. BMFP provides these comments to assist the Forest Service in correcting that problem and developing a Final Revised Plan that meets our expectations.

Sincerely,



Mark Webb, Executive Director
Blue Mountains Forest Partners

Attachments
Attachment A

ATTACHMENT A

BLUE MOUNTAINS FOREST PARTNERS

MODEL MALHEUR NATIONAL FOREST LAND MANAGEMENT PLAN

Core Plan Components and Other Plan Content

Purpose of this draft. This document translates the substantive direction in BMFP's Zones of Agreement into a model set of Desired Conditions, Objectives, Standards, Guidelines, Suitability determinations, Management Approaches, and monitoring requirements for the Malheur National Forest.

Contents

1. Plan Framework and Interpretation

This model plan is written for the Malheur National Forest and is intended to demonstrate how the Forest Service could translate the 2012 Planning Rule, the Blue Mountains Assessment, Malheur-specific science, and BMFP's collaborative products into an integrated and measurable planning framework. It focuses on the substantive topics for which the reviewed record supplies sufficient information to draft meaningful direction. It does not attempt to reproduce every administrative, designated area, minerals, lands, recreation, cultural, or procedural provision required in a complete federal land management plan.

MNF-FWK-DC-01 The Malheur National Forest is a healthy, diverse, and connected ecosystem resilient to natural and human disturbance; sustains native species and ecological processes; contributes economic and social value to surrounding communities; and reduces risk to communities and critical infrastructure from fast-moving, high-severity wildfire.

MNF-FWK-DC-02 Restoration is evident at forest and watershed scales within 30 years and is implemented through integrated programs that address upland vegetation, fire, aquatic and riparian systems, roads, wildlife habitat, and special habitats together rather than as unrelated outputs.

MNF-FWK-STD-01 Project and activity decisions must identify the applicable desired conditions, the current condition and trajectory at the relevant scale, the ecological processes limiting attainment, and the measurable outcomes expected from the action.

MNF-FWK-STD-02 A project may not count toward a restoration Objective solely because acres were treated or an activity was completed. The decision must identify at least one outcome indicator and a timeframe for determining whether the treatment moved conditions toward the applicable Desired Condition.

MNF-FWK-GDL-01 Where multiple methods could attain the same ecological outcome, projects should select the method that most effectively addresses the limiting process while minimizing unnecessary disturbance, long-term maintenance, and risk to retained ecological values.

MNF-FWK-GDL-02 Site-specific flexibility should be used within documented ecological sideboards. Departures from numeric or narrative guidance should explain why the alternative approach is equally or more effective and identify monitoring sufficient to test that conclusion.

MNF-FWK-MAPR-01 Use collaborative review early in project development to identify ecological objectives, unresolved scientific questions, and implementation tradeoffs before alternatives are fixed.

MNF-FWK-STD-03 For landscape projects exceeding 1,000 acres of proposed vegetation treatment, the interdisciplinary team must prepare an integrated restoration framework addressing, at minimum: vegetation composition and structure; mature and old trees; fire and fuels; special habitats; aquatic and riparian function; road effects; wildlife coarse-, meso-, and fine-filter needs; climate vulnerability; treatment sequencing; and monitoring.

MNF-FWK-GDL-03 Integrated restoration frameworks should identify areas requiring active treatment, passive recovery, protection, or further information; they should not presume that a uniform treatment intensity is appropriate across the project area.

2. Forest-Wide Ecological Integrity and Climate Adaptation

MNF-ECO-DC-01 Terrestrial and aquatic ecosystems maintain or recover the composition, structure, function, connectivity, and disturbance processes characteristic of resilient Blue Mountains ecosystems, adjusted where necessary for foreseeable climate conditions.

MNF-ECO-DC-02 Native ecosystem types and seral stages are represented and distributed across environmental gradients in patterns that provide redundancy, refugia, and permeability for native species.

MNF-ECO-DC-03 Ecological restoration maintains options for future adaptation by retaining biological legacies, genetic diversity, old trees, climate refugia, cold-water habitat, and representative untreated or lightly treated areas.

MNF-ECO-OBJ-01 Within 5 years, complete a forest-wide climate-vulnerability and refugia map for old trees, cold-water systems, aspen and hardwoods, whitebark pine, Pacific marten habitat, and other identified vulnerable ecosystems. Update at least every 10 years.

MNF-ECO-STD-01 Project analyses must distinguish between historical reference conditions used as diagnostic information and Desired Conditions adjusted for current and projected climate, and must explain any material difference.

MNF-ECO-GDL-01 Projects should maintain or increase landscape permeability rather than rely solely on fixed linear connectivity corridors where those corridors would perpetuate uncharacteristically dense or vulnerable conditions.

MNF-ECO-GDL-02 Treatments should retain sufficient untreated or lightly treated areas to represent uncertainty, provide habitat heterogeneity, and support learning, while avoiding default retention of high-risk conditions merely because outcomes are uncertain.

MNF-ECO-MAPR-01 Use scenario planning to test treatment performance under drought, wildfire, insects, and changing regeneration patterns.

3. Upland Forest Restoration

MNF-FOR-DC-01 Dry ponderosa pine and dry mixed-conifer forests are generally dominated by fire- and drought-tolerant species, with densities and spatial patterns that can persist under recurring low- and mixed-severity fire.

MNF-FOR-DC-02 Moist and cold forests contain a diverse distribution of seral stages, patch sizes, canopy conditions, and biological legacies consistent with site productivity, disturbance regimes, wildlife needs, and climate vulnerability.

MNF-FOR-DC-03 Forest structure is spatially heterogeneous at stand and landscape scales, including individual trees, clumps, openings, denser patches, early-seral areas, and untreated areas located for defined ecological purposes.

MNF-FOR-DC-04 Meadows, savannas, hardwood stands, and other historically open or nonforest communities are not lost through conifer infill and are embedded within functional transition zones.

MNF-FOR-DC-05 Restoration treatments maintain or improve understory diversity, soil function, native plant communities, and habitat elements while reducing vulnerability to drought, insects, and uncharacteristic fire.

MNF-FOR-OBJ-01 Treat an average of 100,00-200,00 acres per decade through mechanical, prescribed-fire, managed-wildfire, or combined restoration, with no less than 25 percent of treated acres receiving prescribed fire or beneficial wildfire during the decade.

MNF-FOR-OBJ-02 Restore or maintain at least 5,000 acres per decade of meadows, savannas, hardwood transition zones, and other historically nonforest or open-forest communities affected by conifer encroachment.

MNF-FOR-OBJ-03 Within 10 years, complete landscape restoration strategies for all major dry forest planning areas, identifying treatment, fire, road, aquatic, wildlife, and monitoring priorities.

MNF-FOR-STD-01 Silvicultural prescriptions must identify the potential vegetation group, existing and desired composition and density, spatial pattern, old tree and wildlife habitat elements, expected fire behavior, and expected trajectory with and without treatment.

MNF-FOR-STD-02 Removal of all or nearly all trees from areas larger than 2 acres is prohibited unless necessary to restore a historically open or nonforest ecosystem, create early seral habitat supported by landscape analysis, reinitiate aspen or other hardwoods, or meet an emergency public-safety need.

MNF-FOR-STD-03 Commercial product value may influence operational feasibility but must not solely determine the ecological need, location, intensity, or sequence of treatment.

MNF-FOR-GDL-01 In dry forests, treatments should favor fire- and drought-tolerant species, reduce competition around mature and old trees, restore variable spacing, and reduce ladder and surface fuels while retaining habitat heterogeneity.

MNF-FOR-GDL-02 In moist and cold forests, treatment intensity should vary with site productivity, departure, disturbance risk, wildlife needs, and climate vulnerability; broad application of dry-forest prescriptions should be avoided.

MNF-FOR-GDL-03 Treatment prescriptions should explicitly describe how residual structure will interact with future succession, wildfire, prescribed fire, insects, drought, and foreseeable follow-up management.

MNF-FOR-GDL-04 Mechanical treatment should generally be paired with a funded and scheduled plan for prescribed fire, managed wildfire, or other surface-fuel maintenance where fire is an ecologically appropriate process.

MNF-FOR-GDL-05 Openings and denser untreated patches should be deliberately located based on soils, moisture, old tree pattern, wildlife habitat, natural fire behavior, and historical nonforest conditions rather than distributed mechanically or uniformly.

MNF-FOR-MAPR-01 Use local monitoring plots and Malheur-specific research to refine post-treatment density and composition ranges by potential vegetation group and landscape position.

4. Mature and Old Trees

MNF-OLD-DC-01 Old trees and future old trees are abundant, well distributed, and resilient across the Forest; their species composition and spatial pattern reflect site potential and disturbance regimes.

MNF-OLD-DC-02 Old ponderosa pine, western larch, Douglas-fir, grand fir, and other native species occur in densities and landscape positions where they can persist under drought, insects, and fire without being isolated from recruitment cohorts or associated habitat elements.

MNF-OLD-DC-03 Large tree habitat includes old trees, large non-old trees where ecologically appropriate, legacy trees, future replacement trees, snags, down wood, and spatial arrangements needed by associated species.

MNF-OLD-OBJ-01 Within 5 years, building on existing Malheur-specific monitoring establish a statistically valid forest-wide inventory and trend monitoring program for mature and old trees by species, age class or old tree characteristics, potential vegetation group, and landscape position.

MNF-OLD-OBJ-02 Treat at least 20,000 acres per decade to reduce competition and fire risk around high priority old trees and old tree neighborhoods, with effectiveness monitoring on a representative sample.

MNF-OLD-STD-01 Old trees, as determined by species-specific age or validated old tree characteristics, must be retained except where removal is necessary for public safety, administrative access, or ecological restoration that cannot reasonably be accomplished through another method. Any exception must be individually documented.

MNF-OLD-STD-02 Diameter alone must not be used as a substitute for tree age. Projects proposing removal of large trees must identify whether each affected tree is old, a legacy tree, or needed for recruitment or habitat structure.

MNF-OLD-STD-03 Projects must not count retention of old trees as sufficient conservation where untreated competition, ladder fuels, or altered fire behavior is likely to cause foreseeable loss.

MNF-OLD-GDL-01 Treatments should reduce competition from younger trees around old trees, with the radius and intensity based on species, crown condition, site productivity, radial growth, fire exposure, and tree neighborhood density.

MNF-OLD-GDL-02 Large non-old trees should be retained where they provide scarce habitat structure, recruitment, shade, connectivity, or other ecological function that is otherwise lacking at the stand level, but may be removed where necessary to restore composition, density, special habitats, or resilience and where old tree and wildlife objectives are otherwise met.

MNF-OLD-GDL-03 Prescribed fire around old trees should use preparation, ignition patterns, and fuel treatments that minimize avoidable basal, cambial, and crown injury while maintaining fire as an ecological process.

MNF-OLD-MAPR-01 Use radial growth, crown condition, bark and form, age data, and post-treatment survival to refine old tree vulnerability and treatment sideboards.

5. Fire and Fuels

MNF-FIRE-DC-01 Fire operates as an ecological process at spatial and temporal scales compatible with ecosystem type, climate, public safety, and the persistence of old trees, aquatic refugia, and wildlife habitat.

MNF-FIRE-DC-02 Communities and critical infrastructure are buffered by strategically located treatments that reduce the probability of fast moving, high-severity fire without shifting avoidable ecological risk to remote watersheds or high value habitat.

MNF-FIRE-DC-03 Fuel conditions in treated landscapes can be maintained through recurring prescribed fire, beneficial wildfire, or other ecologically appropriate maintenance.

MNF-FIRE-OBJ-01 Apply prescribed fire or manage wildfire for resource benefit on an average of at least 15,000-25,000 acres annually, emphasizing maintenance of prior mechanical treatments, community protection, hardwood systems, and landscape connectivity.

MNF-FIRE-OBJ-02 Within 5 years, identify priority prescribed fire landscapes and a 10-year sequence linking mechanical preparation, smoke capacity, workforce, and follow up maintenance.

MNF-FIRE-STD-01 Wildfire response strategies must identify and protect incident-specific ecological values, including old tree concentrations, aspen and hardwood stands, riparian systems, high-value snags, and known habitat for fine-filter species, consistent with firefighter and public safety.

MNF-FIRE-GDL-01 Wildfire management should use the full range of response strategies where conditions permit, including managed fire to restore ecological processes and reduce future risk.

MNF-FIRE-GDL-02 Fuel treatment effectiveness should be evaluated by subsequent fire behavior, severity, ecological response, and maintenance need, not solely by acres treated or fuels removed.

MNF-FIRE-GDL-03 Suppression repair and emergency stabilization should avoid creating permanent roads, unnecessary dozer lines, or stream impacts and should restore affected areas promptly.

6. Post-Disturbance Management

MNF-POST-DC-01 Post-fire and other disturbed landscapes retain sufficient biological legacies, live and dead structure, early seral habitat, soil function, aquatic protection, and seed sources to support recovery and future resilience.

MNF-POST-DC-02 Post-disturbance actions are prioritized by ecological need and public safety; commercial recovery is secondary to soil, water, wildlife, regeneration, and long-term resilience.

MNF-POST-OBJ-01 For disturbances exceeding 5,000 acres, complete a rapid ecological assessment within 120 days addressing severity, soils, aquatic risk, invasive species, regeneration, old tree survival, special habitats, roads, snag habitat, and climate-adjusted recovery pathways.

MNF-POST-STD-01 Post-disturbance harvest must retain live trees, snags, and down wood sufficient to meet wildlife species-specific and ecosystem-specific habitat needs and must not remove structure needed for soil protection, stream function, or natural regeneration.

MNF-POST-STD-02 No post-disturbance treatment may occur in aspen, riparian hardwood, wet meadow, or known fine-filter habitat without a resource-specific restoration and monitoring design.

MNF-POST-GDL-01 Salvage should be considered where necessary for safety, access, restoration feasibility, defined ecological objectives and where economic opportunities exist.

MNF-POST-GDL-02 Reforestation should favor species, densities, and spatial patterns likely to persist under projected climate and should retain natural regeneration where it is ecologically adequate.

MNF-POST-GDL-03 Post-fire road use should be limited to routes that can be maintained without unacceptable sediment delivery; temporary access should be decommissioned promptly.

7. Aspen and Other Hardwood Habitats

MNF-ASP-DC-01 Aspen stands are larger, more numerous, well distributed, and structurally complex, with viable overstory, midstory, understory, and recruitment above browse height.

MNF-ASP-DC-02 Aspen/meadow and aspen/riparian systems have hydrologic conditions capable of supporting stand persistence and expansion, including floodplain connectivity and adequate late-season soil moisture.

MNF-ASP-DC-03 Aspen landscapes contain a diversity of stand ages, sizes, genetic sources, and treatment histories so that disturbance does not eliminate overstory habitat or recruitment across an entire watershed or project area at one time.

MNF-ASP-OBJ-01 Restore at least 10,000 acres of aspen habitat per decade, measured as the treated stand plus its ecological sprouting and expansion zone. At least 60 percent of treated acres must demonstrate successful recruitment above browse height within 10 years.

MNF-ASP-OBJ-02 Within 5 years, complete a forest-wide aspen inventory identifying stand boundaries, 100-150 foot sprouting zones, structural condition, browse pressure, conifer competition, hydrologic limitation, genetic considerations, and restoration priority.

MNF-ASP-STD-01 Aspen restoration treatments must evaluate and, where ecologically appropriate, treat the full potential sprouting zone extending 100 to 150 feet from the outermost mature stems.

MNF-ASP-STD-02 Conifers displaying validated old-growth characteristics must be retained unless their density, placement, or species materially prevents aspen persistence or expansion and no less damaging alternative is available. Large diameter alone does not establish old-growth status.

MNF-ASP-STD-03 Where 50 percent or more of current-year suckers are browsed and no cohort is recruiting above 6 to 8 feet, the project must implement browsing controls such as fencing, deterrents, altered timing or distribution of use, or temporary exclusion, and monitor effectiveness.

MNF-ASP-STD-04 Before coppicing or high severity prescribed fire is used to reinitiate an aspen stand, the project must evaluate hydrologic limitation, landscape age class distribution, loss of overstory habitat for 30 to 40 years, and the ability to protect post-treatment suckers.

MNF-ASP-GDL-01 Treatments should prioritize stand expansion rather than preservation of existing stems alone, including removal of non-old competing conifers where needed to release light and moisture.

MNF-ASP-GDL-02 Fencing should be designed for local ungulate behavior, include the expansion zone where practicable, avoid unnecessarily blocking wildlife movement, and be maintained until recruitment is established, commonly 10 to 15 years.

MNF-ASP-GDL-03 Where aspen occurs in wet meadows or floodplains, hydrologic restoration should precede or accompany conifer removal, burning, or coppicing when altered water tables limit recovery.

MNF-ASP-GDL-04 New seed origin stands and genetically-distinct stands should be identified and protected to maintain genetic diversity.

MNF-ASP-MON-01 Monitor stand area, sucker density, percent browsed, recruitment above browse height, age and structural classes, conifer reinvasion, fence condition, hydrologic function, and persistence after drought or fire.

MNF-HDW-DC-01 Cottonwood, willow, alder, mountain mahogany, and other native hardwood communities are persistent, regenerating, and distributed across suitable sites and transition zones.

MNF-HDW-GDL-01 Hardwood restoration should address the primary limiting process—conifer competition, browsing, altered fire, hydrology, or invasive species—rather than apply a uniform treatment to hardwood stands.

8. Aquatic and Riparian Conservation

MNF-ARCS-DC-01 Watersheds contain a connected and well-distributed network of cold, clean, complex, and resilient aquatic and riparian habitats capable of supporting native species, beneficial uses, and recovery following disturbance.

MNF-ARCS-DC-02 Riparian areas are dominated by native hardwoods, sedges, rushes, forbs, and other vegetation appropriate to site hydrology; conifer presence and density do not prevent hardwood persistence, floodplain function, or late-season water retention.

MNF-ARCS-DC-03 Streams and floodplains route and retain water, wood, sediment, and nutrients in patterns compatible with natural disturbance and watershed potential.

MNF-ARCS-DC-04 Road networks and crossings have minimal hydrologic connectivity, sediment delivery, floodplain occupancy, and barriers to aquatic organism passage.

MNF-ARCS-OBJ-01 Maintain or improve at least five Priority Watersheds per decade by completing essential projects identified in watershed restoration action plans and demonstrating improvement in at least one outcome indicator.

MNF-ARCS-OBJ-02 Restore at least 50 miles of stream or floodplain and 6,000 acres of riparian vegetation per decade, including hardwood expansion, large wood, beaver-compatible restoration, and hydrologic reconnection.

MNF-ARCS-STD-01 The five ARCS elements—Key Watersheds, Riparian Management Areas, watershed analysis, watershed restoration, and monitoring/adaptive management—must be applied as an integrated framework for projects with potential for substantial watershed effects.

MNF-ARCS-STD-02 A current watershed analysis is required before authorizing a project that proposes more than 500 acres of vegetation treatment within a watershed, narrows default RMA widths, constructs or reconstructs more than one mile of road in an RMA, or may substantially affect listed aquatic species or water quality.

MNF-ARCS-STD-03 Watershed analyses more than 15 years old may be used only after an interdisciplinary review confirms that they adequately address current conditions, climate, roads, aquatic species, and management questions.

MNF-ARCS-STD-04 Within Key Watersheds, projects must maintain or improve watershed integrity and may not create a net increase in hydrologically connected road mileage or long-term sediment risk.

MNF-ARCS-STD-05 Commercial products may result from riparian restoration, but the location, intensity, and design of treatment within RMAs must be determined by aquatic and riparian restoration objectives.

MNF-ARCS-GDL-01 Riparian restoration should use a whole-watershed approach integrating upland treatments, fire, roads, crossings, floodplains, recreation, and special habitats.

MNF-ARCS-GDL-02 Where conifers suppress native riparian hardwoods, floodplain roughness, or late-season moisture, treatments should remove non-old competing conifers and facilitate hardwood expansion while retaining trees needed for shade, bank stability, large wood, or wildlife.

MNF-ARCS-GDL-03 Restoration should prioritize protection of high-quality habitat and functioning watersheds, correction of root causes, treatment at the scale of the limiting process, and explicit expected outcomes.

MNF-ARCS-GDL-04 Projects should use natural processes and low-maintenance methods, including floodplain reconnection, beaver dam analogues or beaver-compatible restoration, large wood, and native vegetation, where suitable.

MNF-ARCS-GDL-05 Watershed restoration action plans should identify all essential projects, sequencing, costs, partners, expected outcomes, and off-forest dependencies; completion alone does not establish ecological restoration.

MNF-ARCS-MAPR-01 Maintain a long-term Key Watershed network and a rotating set of near-term Priority Watersheds. Changes to the Key Watershed network should be supported by watershed analysis, species-recovery needs, climate refugia, connectivity, and public review.

9. Wildlife Diversity and Habitat

MNF-WILD-DC-01 Native terrestrial vertebrate species persist within the plan area through a complementary coarse- and fine-filter habitat framework.

MNF-WILD-DC-02 Plant communities and seral stages are represented across landscapes in amounts and patterns sufficient to provide habitat for coarse-filter species and ecological processes.

MNF-WILD-DC-03 Structural conditions—including canopy pattern, openings, snags, down wood, large trees, hardwoods, security habitat, and proximity to water—occur in the placement and combinations needed by wildlife species.

MNF-WILD-OBJ-01 Within 5 years, complete and publish habitat models and inventory priorities for all designated fine-filter species and for coarse-filter structural conditions not adequately represented by existing data.

MNF-WILD-OBJ-02 Within 10 years, establish forest-wide status and trend baselines for snags, down wood, large-tree habitat, meadow and savanna transition zones, and motorized-route effects on elk and mule deer.

MNF-WILD-STD-01 Project analyses must identify affected wildlife filters and may not assume that vegetation type or seral stage alone satisfies species needs where structural placement or species-specific habitat elements are limiting factors to persistence.

MNF-WILD-STD-02 Known occupied habitat for fine-filter species must be managed using species-specific direction unless a project-level analysis demonstrates that an alternative design will maintain or improve habitat capability and persistence.

MNF-WILD-GDL-01 Habitat analyses should evaluate structural features in spatial context, including their distribution relative to openings, water, roads, topography, and adjacent habitat—not solely average stand conditions.

MNF-WILD-GDL-02 Snags should be retained where safe and ecologically appropriate. Where snag density, size, species, decay class, or placement is deficient, projects should provide for immediate and future recruitment through green-tree retention, prescribed fire, or other methods.

MNF-WILD-GDL-03 Snag and down-wood direction should be tailored to ecosystem type and species need and should avoid uniform forest-wide averages that obscure local deficits.

MNF-WILD-MON-01 Multi-party monitoring should evaluate whether treatments retain or recruit the structural conditions and habitat elements identified in project decisions.

10. Elk, Mule Deer, Roads, and Security Habitat

MNF-UNG-DC-01 Elk and mule deer have access to nutritionally adequate forage, hiding and security habitat, seasonal ranges, migration areas, and low-disturbance habitat distributed to retain animals on National Forest System lands and reduce chronic displacement to private lands.

MNF-UNG-DC-02 Forest management reduces avoidable crop depredation and public-private conflict by improving usable habitat—not merely forage production—on National Forest System lands.

MNF-UNG-OBJ-01 Within 5 years, map elk and mule deer security habitat, seasonal concentration areas, migration areas, forage treatments, open route influence zones, and private-land conflict areas using current traffic and route use information.

MNF-UNG-STD-01 Vegetation projects intended to improve elk or mule deer habitat shall evaluate whether animals can use the resulting forage given distance to open motorized routes, traffic frequency, security cover, season, and hunting disturbance.

MNF-UNG-STD-02 New permanent motorized routes may not be added within mapped priority security habitat unless no feasible alternative exists and the decision provides an equal or greater reduction in effective disturbance elsewhere in the same landscape.

MNF-UNG-GDL-01 Route management should use distance-to-open-route, traffic volume, route pattern, topography, and seasonal use rather than road density alone.

MNF-UNG-GDL-02 Forage treatments should be paired with road and disturbance management where open routes would otherwise make treated habitat ineffective or increase displacement to private lands.

MNF-UNG-GDL-03 Security habitat should include vegetation and terrain that reduce visibility and human disturbance during biologically important periods; it need not perpetuate uncharacteristically dense or fire-vulnerable stands where terrain, seasonal closures, or spatial design can provide equivalent function.

MNF-UNG-MON-01 Monitor elk and mule deer occupancy, distance to open routes, traffic levels, use of forage treatments, seasonal distribution, and displacement or depredation complaints.

11. Pacific Marten SCC Fine-Filter Plan Components

MNF-MART-DC-01 Pacific marten habitat occurs in connected, climate-resilient networks containing suitable plant communities, late seral structure, complex understories, large live and dead trees, down wood, subnivean access, and low fragmentation refugia.

MNF-MART-OBJ-01 Within 5 years, complete systematic surveys and validate habitat models across predicted high-, medium-, and low-suitability gradients.

MNF-MART-STD-01 Until surveys and models establish otherwise, proposed treatments within predicted high suitability marten habitat must retain the habitat elements and landscape connectivity identified by the best available science and may not rely on coarse filter vegetation direction alone.

MNF-MART-GDL-01 Treatments in marten landscapes should maintain or restore a connected mosaic of denning, resting, foraging, and movement habitat, with particular attention to large down wood, complex vertical structure, and snow-season function.

MNF-MART-MON-01 Monitor occupancy, reproductive evidence where feasible, habitat element retention, and model performance.

12. Collaboration, Science, and Adaptive Management

MNF-COL-DC-01 Collaborative engagement improves the ecological quality, durability, efficiency, and public understanding of Forest management while preserving the responsible official's legal authority and accountability.

MNF-COL-OBJ-01 Convene at least two annual forest-wide collaborative science and implementation reviews addressing monitoring results, project outcomes, emerging science, and needed plan or program adjustments.

MNF-COL-STD-01 For major landscape projects, the Forest Service must disclose how relevant collaborative agreements, local science, and monitoring were considered and identify significant provisions adopted, modified, or rejected.

MNF-COL-STD-02 Where best available scientific information materially conflicts, the project or plan record must describe the competing information, the basis for the chosen approach, the uncertainty retained, and the monitoring needed to resolve that uncertainty.

MNF-COL-GDL-01 Collaborative involvement should begin during problem definition and development of ecological objectives, not only after a proposed action is substantially complete.

MNF-COL-GDL-02 Multi-party monitoring should be used for questions involving significant scientific uncertainty, social disagreement, or repeated application across landscapes.

MNF-COL-MAPR-01 Maintain a public adaptive-management register listing key assumptions, monitoring commitments, triggers, responsible programs, results, and management responses.

MNF-COL-MAPR-02 Use the BMFP Zones of Agreement as living scientific and collaborative references; review proposed updates through an open process and distinguish BMFP consensus from agency policy.

13. Monitoring Program

The monitoring program is designed to answer whether management changed ecological conditions, not merely whether activities occurred. It supplements, rather than replaces, project, program, biological opinion, best management practices, and partnership monitoring (including but not limited to Collaborative Forest Landscape Restoration Program monitoring).

MNF-MON-STD-01 The biennial monitoring evaluation report shall identify whether each trigger was met, the management response taken or proposed, the responsible official and program, and the schedule for completion of adaptive action.

MNF-MON-STD-02 Monitoring commitments required by a project decision must be funded or secured before implementation where the monitoring is necessary to determine whether the project will meet plan direction.

MNF-MON-GDL-01 Monitoring should use statistically valid designs and existing regional programs where suitable, supplemented by local measurements necessary to evaluate Malheur-specific questions.

MNF-MON-GDL-02 Results should be published in accessible formats with spatial data sufficient to support collaborative review, subject to protections for sensitive species and information, including traditional ecological knowledge.

Monitoring Questions, Indicators, & Adaptive Management

Plan Component	Topic	Monitoring Question	Core Indicators	Frequency	Trigger & Response
MNF-MON-01	Ecological integrity	Are ecosystem composition, structure, function, connectivity, and disturbance processes moving toward	Condition and trend by ecosystem; landscape pattern; disturbance outcomes; climate-adjusted departure.	Every 5 years	If trend is adverse for two reporting periods, identify causal factors and propose plan or program change.

		desired conditions?			
MNF-MON-02	Old trees	Are mature and old trees persisting and recruiting across species and landscape positions?	Survival, mortality cause, radial growth, crown condition, recruitment, treatment response.	Annual sample; 5-year synthesis	Where treatment increases mortality or fails to improve vigor, revise prescriptions before broader application.
MNF-MON-03	Aspen	Do treatments produce expanded, structurally complex, successfully recruiting stands?	Stand area; sucker density; browse percent; stems above 6-8 feet; hydrology; conifer reinvasion; fence condition.	Years 1, 3, 5, 10, 15	At >=50% browse with no recruitment, implement or strengthen controls. If hydrology limits recovery, address hydrology before reinitiation.
MNF-MON-04	Fire effectiveness	Do treatments change subsequent fire behavior and ecological outcomes?	Severity, spread, old tree survival, soil and riparian effects, maintenance interval.	After relevant wildfire; 5-year synthesis	Revise treatment design or maintenance where expected fire moderation or ecological benefit is not achieved.
MNF-MON-05	Aquatic and riparian	Are watershed, stream, floodplain, and riparian functions improving?	Temperature, flow, sediment, pools, wood, hardwood cover, floodplain connectivity, road risk, biotic indicators.	PIBO/BMP/CFLRP cycles plus project monitoring	Where projects cause decline or restoration fails, implement corrective action before additional similar disturbance.
MNF-MON-06	Elk	Can elk and mule deer use habitat created	Occupancy, traffic, distance to routes, forage use, security	Seasonal samples; 5-year synthesis	Where forage treatments increase displacement or

		or maintained by projects?	habitat, private-land displacement.		conflict, pair future work with route or disturbance management.
MNF-MON-07	Wildlife filters	Are coarse-, meso-, and fine-filter assumptions providing for species persistence?	Habitat representation, structural placement, fine-filter occupancy, snag/down wood, model validation.	5 years	If a filter fails for a species, add or revise species-specific direction.
MNF-MON-09	Implementation balance	Is the integrated restoration program being implemented as assumed?	Acres and outcomes for mechanical treatment, fire, roads, aquatic work, special habitats, and monitoring; funding and staffing.	Annual	If commercially attractive outputs outpace complementary restoration, adjust program sequencing and disclose effects.

Appendix A. Definitions

A.1 Component abbreviations and definitions

Abbreviation	Component type	Function
DC	Desired condition	The measurable ecological, social, or economic condition toward which management is directed.
OBJ	Objective	A concise, measurable, and time-specific rate of progress.
STD	Standard	A mandatory constraint with no project-level departure.
GDL	Guideline	A constraint allowing an alternative design only if equally effective in meeting the purpose.
MAPR	Management approach	Optional or strategic implementation guidance; not a substitute for a component.
MON	Monitoring direction	Question, indicator, trigger, or response used to test assumptions and require adaptation.

A.2 Key definitions

Disciplined discretion: Management flexibility bounded by explicit ecological objectives, relevant scales, measurable sideboards, monitoring, and required responses.

Ecological restoration: The process of assisting recovery of ecosystem composition, structure, function, connectivity, and disturbance processes; completion of an activity does not by itself establish restoration.

Integrated restoration framework: A landscape-scale document connecting vegetation, fire, water, roads, wildlife, climate, special habitats, treatment sequencing, and monitoring.

Old tree: A tree meeting species-specific age thresholds or validated old tree characteristics; diameter is relevant but not determinative. *See generally*,

Old tree neighborhood: The stand-scale or substand-scale area surrounding one or more old trees within which management is designed to protect the persistence of existing old trees and provide for recruitment of future old trees. The neighborhood includes the old trees, their crown and root influence zones, nearby replacement trees, large snags and down wood, and sufficient surrounding area to manage competition, fuels, fire behavior, and other stressors while maintaining appropriate structural diversity and wildlife habitat. Boundaries are established using site-specific ecological conditions rather than a fixed distance alone.

Legacy tree: A live tree retained from an earlier stand or disturbance condition that provides ecological continuity, regardless of whether it meets an old tree threshold.

Key Watershed: A long-term watershed in a connected and replicated network important for aquatic species, high-quality water, refugia, or downstream benefits.

Priority Watershed: A near-term Watershed Condition Framework focus area selected for coordinated restoration, generally for a 5-7 year period.

Hydrologically connected road: A road or road segment that delivers water, sediment, or pollutants to a stream, wetland, floodplain, or groundwater-dependent ecosystem.

Security habitat: Habitat where vegetation, terrain, distance from open motorized routes, traffic, and seasonal management allow elk or mule deer to use forage and cover with reduced human disturbance.

Successful aspen recruitment: A regenerating cohort that survives browsing and grows above the locally applicable browse zone, generally 6-8 feet, in sufficient density and distribution to replace the overstory and expand or maintain the stand.