Data Submitted (UTC 11): 11/5/2024 8:00:00 AM
First name: Emil
Last name: Doyle
Organization:
Title:
Comments: Emil Doyle, Field Botanist

5 November 2024

COMMENT ON:

Draft Need To Change, Malheur, Umatilla, and Wallowa-Whitman National Forests, Known together as the Blue Mountains National Forests (October 2024)

Once again, my thanks to the Planning Team and their hard work and for the opportunity to submit my third comment throughout Revised BMFP Process.

It is important that in this understandably very short "Need To Change" document, that you include precise naming of as many facets and topics as possible that will be included in the EIS draft processes. It is from this perspective which I supply the following comments and suggestions.

Introduction

Page 1, Paragraph 2: "The 1990 forest plans also don't adequately address current science and local knowledge."

Planning Team: Since this plan could be the new planning platform for another 20-30 years, please consider revising the above line as follows: "The 1990 forest plans also don't adequately address current 'and quickly evolving science' and local knowledge".

Maintain or Restore Aquatic Habitats and Ecosystem Integrity

Page 5, Paragraph Title - wording

Planning Team: Please change the wording of this title to be more specifically inclusive of what the forest plan will have to address: Maintain or Restore All Aquatic Habitats and Their Ecosystem and Hydrological Integrity.

Page 5, Paragraph 2

Planning Team: Many aspects of the forests' basic hydrology and the distribution of various forms of aquatic habitats across the forests, are understudied and need further definition and understanding, such as the

distribution of montane wetlands, cryptic wetlands (obscured by canopy), including seasonally wet meadows, perennially wet meadows, and fens. Note, Fens are present in our "dry Blues". They can be Groundwater-Dependent Ecosystems which are spring-fed and can be either stand-alone hydrologic systems or can be a portion of a greater wetland complex with more than one type of wetland present. I make this point because of in our current state of changing precipitation delivery timing, quantity and type (snow/rain), and due to expected increasing demands that will be placed on the Forests' hydrological resources, the Need To Change document should point this out directly. Water resources may ultimately become the prime management challenge on our Eastside National Forests. The reality is that the Blue Mountains are what you could call "the great collector-distributor" of all water in our region.

Page 5,Paragraph 2 points out in detail the framework of directives within which the Forest Plan must function. Given the reality that the Blue Mountains are the great collector upon which almost all regional hydrology appetites are satisfied, please include specifically what those water resources under the plan shall be:

For example: Mention the list that contains the specific hydrological resources that the Plan will attempt to conserve, manage and restore - "rivers and their montane stream tributaries and their riparian habitat zones, wet meadows and seasonally wet meadows, Groundwater-Dependent Ecosystems including fens, and cryptic wetlands."

Language is so important, and continuity must carry over from the Assessment Phase, and the Need To Change and into the EIS phases.

Thank you very much,

Emil Doyle