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Comments: See attached. Thank you.

Text from letter:

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Blue Mountains Forest Planning Team Umatilla National Forest Headquarters 72510 Coyote Road

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Submitted electronically: <https://cara.fs2c.usda.gov/Public/CommentInput?Project=64157>

RE: Blue Mountains Forest Plan Preliminary Need to Change comments

I am writing on behalf of Greater Hells Canyon Council (GHCC) regarding the request for informal feedback on the [ldquo]Preliminary Need to Change Malheur, Umatilla, and Wallowa-Whitman National Forest Plans[rdquo] document. GHCC is a non-profit conservation organization based in Northeast Oregon with over 2,000 supporters. We were founded in 1967 (as Hells Canyon Preservation Council), and our mission is to connect, protect, and restore the wild lands, waters, native species and habitats of the Greater Hells Canyon Region, ensuring a legacy of healthy ecosystems for future generations.

GHCC has been heavily involved in the last several planning efforts, including the last rounds of forest plan revisions and travel management planning. In the last forest planning attempt, we were fully engaged through the objections process alongside a number of other conservation organizations. We are participating in this planning effort in good faith, hoping to affect positive change in the plan.

Opportunities for Improvement of the Preliminary Need to Change document:

Add [ldquo]Maintain and Enhance Terrestrial and Aquatic Habitat Connectivity[rdquo] as an explicit and standalone need.

Designing new forest plans under the 2012 planning rule is an exciting and important opportunity to maintain and enhance landscape-scale habitat connectivity across all three National Forests. The 2012 Planning Rule defines connectivity as:

[ldquo]Ecological conditions that exist at several spatial and temporal scales that provide landscape linkages that permit the exchange of flow, sediments, and nutrients; the daily and seasonal movements of animals within home ranges; the dispersal and genetic interchange between populations; and the long distance range shifts of species, such as in response to climate change (219.19).[rdquo]

The 2012 rule also requires that the agency must create a plan that maintains and restores ecosystem and watershed [ldquo]structure, function, composition, and connectivity[rdquo] and must take into account:

* [ldquo]Interdependence of terrestrial and aquatic ecosystems in the plan area.

* [ldquo]Contributions of the plan area to ecological conditions within the broader landscape influenced by the plan area.

* Conditions in the broader landscape that may influence the sustainability of resources and ecosystems within the plan area.[rdquo]

The rule also [ldquo]ensures planning takes place in the context of the larger landscape by taking an [lsquo]all-lands approach.[rsquo] Modified Alternative A uses an [lsquo]all-lands approach[rsquo] to consider conditions beyond the plan area and how they might influence resources within the plan area as well as how actions on the NFS might affect resources and communities outside of the plan area. It also requires that responsible officials coordinate with entities with equivalent and related planning efforts.[rdquo] It even goes as far as encouraging the agency to seek [ldquo]opportunities to coordinate with neighboring landowners to link open spaces and take into account joint management objectives where feasible and appropriate.[rdquo]

This can and should go beyond lower level plan components like standards and guidelines, especially given that the planning area for this effort is more than one forest. Forests across this planning area are a connectivity corridor of regional and even continental importance [ndash] just look at the dispersal maps from any charismatic (and GPS collared) megafauna for proof. Maintaining and enhancing habitat connectivity will have positive benefits for all stakeholders and resource areas.

Furthermore, the need to incorporate connectivity planning is reinforced by multiple memorandums and plans, including the 2022 Climate Adaptation Plan¹, the 2022 memorandum Habitat Connectivity and Migration Corridors in National Forest System Planning and Decisions², 2023 memorandum Guidance for Federal Departments and Agencies on Ecological Connectivity and Wildlife Corridors³ as well as in a very recently released USDA memorandum on connectivity issued by Agriculture Secretary Tom Vilsack on October 21st, 2024⁴. The 2024 memorandum, entitled Conserving and Restoring Terrestrial Wildlife Habitat Connectivity and Corridors in the United States, specifically references incorporating corridors into USFS land management planning. Partnering with the Oregon Department of Fish and Wildlife will be key for this work, and luckily they have already completed the Oregon Connectivity Assessment and Mapping Project⁵. Data is readily available for Forest Service lands across the planning area.

It is clear that this is a priority for staff from the local district offices all the way up to decision makers in DC. Connectivity should be listed as an individual subject in the Need to Change document. Elevate Tribal Co-Management and Tribal Rights and Interests as a standalone need. Tribes receive only two cursory mentions in the draft document. Much has changed with tribal engagement in federal land management and policy since the creation of the original plans, and revising these plans is an exciting and important opportunity to enshrine tribal co-management and tribal rights and interests in new management plans.

The agency is well aware of its responsibility to tribes and their members, and must go above and beyond the basic consultation and coordination practices laid out in the planning rule. They can make their commitment to this clear by specifically highlighting this as a need in the final version of the Need to Change document. This section can and should enumerate the ways the agency plans to do this, such as by:

- * safeguarding important sites,
- * incorporating native knowledge,

- * committing to robust protections for, and monitoring of, culturally important wildlife, fish, and plant species, and
- * maintaining and enhancing habitat conditions for culturally important wildlife, fish, and plant species.

1 USDA. (2022). National Roadmap for Ecosystem Services: Forest Service Climate Adaptation Plan. United States Department of Agriculture.

https://www.usda.gov/sites/default/files/documents/4_NRE_FS_ClimateAdaptationPlan_2022.pdf

2 Large Landscapes Conservation. (2022). Habitat connectivity and migration corridors in national forest system planning and decisions. Large Landscapes Conservation.

<https://largelandscapes.org/wp-content/uploads/2022/09/Habitat-Connectivity-and-Migration-Corridors-in-National-Forest-System-Planning-and-Decisions.pdf>

3 The White House. (2023, March 18). Guidance on corridors and connectivity for federal land management agencies. <https://www.whitehouse.gov/wp-content/uploads/2023/03/230318-Corridors-connectivity-guidance-memo-final-draft-formatted.pdf>4 USDA. (2024, October 21). Conserving and Restoring Terrestrial Wildlife Habitat Connectivity

and Corridors in the United States. United States Department of Agriculture.
<https://www.usda.gov/sites/default/files/documents/sm-1077-013.pdf>

5 Priority wildlife connectivity areas (PWCAs). Oregon Department of Fish and Wildlife.

<https://oregonconservationstrategy.org/success-story/priority-wildlife-connectivity-areas-pwcas/>

Add [ldquo]Maintain or Restore Terrestrial Habitats and Ecosystem Integrity[rdquo] as a standalone need.

The agency primarily focused on aquatic habitats and policies/strategies pertaining to them in the [ldquo]Maintain or Restore Aquatic Habitats and Ecosystem Integrity[rdquo] section. While aquatic and riparian ecosystems are extremely important parts of the landscape, terrestrial ecosystems merit more discussion than brief references to regulations and historic forest composition. The quality and quantity of numerous terrestrial habitats have changed dramatically since the original forest plans.

For two examples, consider road densities and source habitats for terrestrial species like goshawks. Road densities have ballooned since the creation of the last plans, with public lands in the Blues having the most substantial road networks of any National Forests in the nation. This translates to more habitat fragmentation and disturbance than ever before, and comes with significant implications for a variety of terrestrial (and aquatic) habitats and species. This must be addressed.

There is abundant evidence of changes to terrestrial habitats beyond the limited discussion of forests and fuel loads in the two ecosystem integrity sections of the draft document. Source habitat for goshawks and other similar terrestrial species have decreased by nearly 50% or more in watersheds throughout the Blues.⁶

These are just two examples of how terrestrial habitats have changed significantly over the course of the previous plans[rsquo] lifespans. There are many disturbance drivers affecting these ecosystems including everything from unmanaged vehicle use, livestock grazing, recreational activities, fuelwood cutting, timber harvest, fire exclusion, and many more. Maintaining and restoring terrestrial habitats and their integrity should be listed as a standalone need in the final Need to Change document.

Conclusion

Thank you for the opportunity to participate in this planning process and for your review of these comments. GHCC looks forward to working with the Forest Service as plan development progresses. Please don[rsquo]t hesitate to contact me with any questions.

Sincerely,

Jamie Dawson, Conservation Director Greater Hells Canyon Council

6 Wisdom, M. J.; Holthausen, R. S.; Wales, B C.; Hargis, C. D. [et al.]. 2000. Source habitats for terrestrial vertebrates of focus in the interior Columbia basin: broad-scale trends and management implications (Vol. 485). US Department of Agriculture, Forest Service, Pacific Northwest Research Station.
<https://research.fs.usda.gov/treesearch/3081>