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Comments: I'm adding additional comments to previous ones I'd made for the public record. Thank you for your time on this.

Text from attachment:

November 7, 2024

To: Blue Mountains Forest Plan Revision Team

Comment Addendum: Draft Preliminary Need to Change

Thank you for preparing the draft document and for providing a way to comment. What follows adds to the comments I've already inserted into the public record.

Section: 2012 Planning Rule With regard to ecosystem integrity

Wildlife habitat is a direct function of ecosystem integrity. All management regimes have an effect on the ecosystems being managed. Those changes will by definition modify the plant communities and the available wildlife habitat. As you develop plans for travel corridors to accommodate animal migrations, those routes must connect to intact habitats for hosting wildlife populations. Any planning for a changing climate only makes sense if it is comprehensive in its vision about such habitat connectivity. You have all the technical and analytical tools necessary to do that sort of planning so please do it.

Preliminary Need to Change the Blue Mountains Forest Plans Section: Plan Amendments Point to the Need for Revision

To reiterate my previous comments: flexible standards imply oversight and the need for sophisticated drone flyovers, equipped with forward looking radar, and lidar. Those remote sensing tools are available. They will greatly improve Forest Service oversight and should be a requirement for any project you contract out. That feedback can take your management and enforcement of project requirements to the next level by allowing the man-hours of savings to be used much more productively.

Section: Maintain or Restore Ecosystem Integrity and Reduce Wildfire Risks to Habitats and Communities With regard to management strategies [hellip] to maintain desired conditions

Lands currently identified as adjacent to, and contiguous with, existing protected areas - and that status includes formal wilderness and the National Recreation Area - must be given the same protection. Those are reservoirs of the very sustainability and diversity you tout. They offer a much greater possibility for management strategies needed "to maintain desired conditions and move uncharacteristic conditions toward desired ranges of vegetation, fuel loads, and habitats". Fire, as one example, is much more likely to bring an ecosystem back to a manageable condition if simply allowed to burn lightly and regularly in such protected areas.

Again, thank you for your time on this planning effort. Norm Cimon

Published August 11th in the La Grande, Oregon Observer.

Thanks to The Observer for publishing a range of views about forest management. Those articles have focused on how trees store carbon, and the perceived value of forest collaboratives. There's a bigger picture that needs to

be understood, one that touches on both.

It's well known that a changing climate can take us down a path we can't quickly return from. That's the evidence from core samples drilled deep into ancient ice. Regular cycles have warmed and cooled our Earth over the last four-hundred thousand years. Very rapid transitions to a much warmer Earth are followed by a slower return to cooler periods that can last thousands of years. Now that we humans are pulling the climate strings, there's no knowing where this might lead. The wild gyrations we've been seeing, from blistering hot for days on end, to a spring that only recently arrived, are a message we need to heed. That may signal even bigger changes.

That variability also reworks ecosystems. Climate records show that forests develop, expand and contract, under specific conditions of precipitation and temperature. Once established they can persist and thrive even through climate swings. In the Wasatch Range which dominates the skyline in northern Utah, thick groves of gambel oak are everywhere at higher elevation. But when the ground finally warms, it's too dry for trees to reproduce from seeds - though they easily germinate in a lab setting. The oaks we see are, instead, part of one large organism, a root mass that corkscrews its way up mountainsides. It sends up a dense growth of leafy stems above ground, visible to us as small trees. The clones, as they're called, can be tens of thousands of years old. In all likelihood, they migrate with the climate, seeding out successfully when conditions allow, hoarding resources underground when they don't.

A similar story plays out here in the interior Northwest. Stringers of trees work their way down from the slopes, forming a thick carpet in north-south running river canyons like the Lostine's. Direct sun only visits that realm for a few hours every day. The deep dark spruce-fir forest that results harbors a very different plant community from the one just a few miles north, where the river spills out onto the open prairie.

Such deeply shaded old-growth forests can sustain an ecosystem through hotter and drier periods, even over centuries, till cooler temperatures and plentiful rainfall return again. They do so as David Mildrexler has written about, also in *The Observer*: by creating their own ecosystem reality. They tap water underground, and move it closer to the surface which hosts plant communities dependent on that moisture. Water is also pumped to the very top of those big trees which transpire it into the canopy above the forest stand, maintaining the microclimate they've created. That's something anyone who's found cool refuge in such a forest on a hot summer day understands instinctively.

Because mature trees can be quite old - those that grow in the Northwest are some of the longest-lived of their kind - they can hold on until favorable climate conditions return again, taking advantage of the changes to expand their range. Seen this way, the ecosystem is a sort of super-organism, growing and changing over time.

Older trees also store very large amounts of carbon. In wetter forests those trees can be covered with lichens and mosses which add even more to the storehouse. Log the big trees from those stands and there is no guaranteed return path to that wetter ecosystem. The water isn't going to be as available to younger growth, the new vegetation will be hotter and drier, and the forest openings will no longer support the same plant community. It could be a very long time before conditions allow for re-emergence of that ecosystem. The microclimate has vanished.

That brings focus back to Lostine Canyon, a very wet place. That cool refuge offers us a humble lesson we should take to heart. We live on the margin of wet and dry. Over thousands of years, our forests have adapted to that reality. We need to do the same by keeping them intact. That's a signal we all need to heed.

Norm Cimon

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