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Umatilla National Forest

Blue Mountains Forest Plan Revision 72510 Coyote Road

Pendleton, OR 97801

VIA: <https://www.fs.usda.gov/project/?project=64157>

RE: Public Feedback on the Draft Preliminary Need to Change and the Final Summary Assessment Report of Ecological, Social and Economic Conditions on the Malheur, Umatilla, and Wallowa-Whitman National Forests #64157

Dear Blue Mountain Forest Plan Revision Team:

Thank you for the opportunity to provide feedback on the Need to Change and Final Summary Assessment Report phase of the revision process. Going forward I would like to see more detailed analysis regarding:

Assessing Ecosystems and Watersheds

Climate [ndash] Because the USFS has a poor history of adopting management practices to climate, and their model of Silviculture has had horrendous results, I would like to see more studies completed on the e]ects of [ldquo]forest resiliency[rdquo] treatments before approving or conducting any more projects. There are numerous projects across the three forests to analyze. I would rather see further study for the next 5-25 years before any more projects are completed. Taking the Willoughby Urban Interface Protection Project as an example, I would like to see studies on ground temperature and how reforestation occurs under the new treatment areas. I would also like to see what the plan is for weed control like bull thistle that has followed commercial logging. Roads that were opened during the project have recently had signage posting those roads as closed and are ine]ective. Motorized vehicles continue to compact soils on and o] those roads. I think there is a need to reclaim those roads and a system of ?nes that have signi?cant teeth along with enforcement to let the public know that the old [ldquo]free for all[rdquo] system is no longer tolerated. Also, sediment monitoring needs to be done in the watersheds below thinning and mastication and burning areas. Soils need to be analyzed for damage from compaction and erosion within all the units of activity. Finally, we need to go back into these areas and subject them to ?re to see if the theories work as anticipated before we redesign the entire forest system.

Soil- I like your stated concerns and hope that you[rsquo]ll adhere to them and follow through with particular attention to the e]ects of livestock grazing, timber harvesting, forest resiliency projects, motorized recreation, wildlife habitat, and carbon storage. Would also like to see a study done (maybe Starkey) on how the removal of elk antlers a]ects soil health. Shed hunting is a big contributor to the compaction of soils OFF ROAD as there is no enforcement for this activity and it primarily takes place via OHV in early spring, during snow melt or rain and warmer temperatures and is completed prior to the ground drying out and hardening.

Air Quality [ndash] Please add emissions from motor sports equipment like OHVs which are used now without any guardrails, as well as motorized vehicles. I would like to see a permit system designed so that the USFS can track use, type, and number of miles to determine some level of CO2 emissions from motorized use. Another factor is the dust that these vehicles disperse while in use. It is signi?cant.

Aquatic, Watershed and Riparian Ecosystems [ndash] My biggest concern is mining, particularly in-stream, or in the stream bed or riparian zone; livestock discharge of waste as well as compaction and erosion of soils; unregulated and unenforced use of OHVs and other motorized equipment; direct and indirect consequences of forest harvest practices including logging, thinning, mastication, burning, et al. The same old culprits of roads, culverts, trails, and too much human caused damage. We need to protect these areas in the highest manner possible. Water is an increasingly scarce resource. I would like to see all areas with surface and ground water considered as criteria to be added to Wilderness designation. This will also protect and rehabilitate ?sh and beaver and other wildlife species valuable to the biosphere.

Terrestrial Vegetation Ecosystems and Species [ndash] I disagree with your statements (in other sections as well) that the lack of wild?re has caused all the problems and that the only solution is to log, thin, etc. There are areas on the national forest we are considering here that have not burned in years and are still healthy. Your descriptions of various ecosystems and species suggests that the USFS has ?gured out how to manage nature. I don[rsquo]t think USFS should try to manage the forest on such a micro level as to decide which species will live and which will die. Fish and Wildlife services has been managing wildlife populations like this forever, and the results are clearly disastrous. They kill seals to save salmon. They kill cougars to save deer. I cannot emphasize enough that the gift of these forests under the management of Mother Nature is what created the forests and is what will sustain them. The less human engineering and interference the healthier our forests will be, combined with limited human activity.

Fire [ndash] it[rsquo]s natural. It is not an entity or event to be demonized to the public for pro?t for the few. Fire is our friend. Fire will cause destruction, which is a natural part of the life cycle. It will cause loss. Just like wind, ice storms, ?oods, earthquakes and so on. I don[rsquo]t read in any of your proposals how you[rsquo]ll either stop these other [ldquo]weather events[rdquo] from occurring nor how you would manage the forest to withstand them. For example, the Smokehouse Creek ?re in the Texas Panhandle burned more than a million acres, the largest in the state[rsquo]s history, earlier this year. It was human caused of course, but even if it had been lightning. The Panhandle is not a forested landscape, it is instead a mostly ?at, grass land. So, the argument that [ldquo]resiliency[rdquo] projects that include commercial logging, thinning, mastication, burning are invalid. I think they are invalid for our forests as well.

What is Texas going to do [ndash] mow all the grass? Spray it all with herbicide to prevent another wild?re? Leave the landscape like a dry Alvord Lake, barren alkali sand? Is that your aim for our forests? To extract all the commercial value in the name of wild?re protection? To improve the economy of local communities who rely on forest products? If you mow down all the trees that puts an end to that economic cycle. The forest is not a plantation. Our national forests need to be protected for what they provide naturally, with minimal management: biodiversity.

Carbon Stocks [ndash] We have the perfect mix already here: grass, old and mature growth trees, intact soil. Let[rsquo]s leave it that way. Let[rsquo]s not trample every square inch with livestock, heavy equipment, and motorized vehicles. Let[rsquo]s get rid of them. Nature, the inventor of our forests has everything all worked out. Leave it alone.

Terrestrial Wildlife Ecosystems and Species [ndash] Our elk populations are not at ODFW [ldquo]target numbers.[rdquo] It doesn[rsquo]t help they just spent the last decade exterminating them because they were ?eeing the national forests. Why were/are they ?eeing? Hunting, OHV use, year-round access for all motorized

vehicles and motor sports, logging, livestock grazing, and now drones, LiDAR technology, just constant human interruption. Our forests have hunting YEAR AROUND. You can always kill something on our national forests. You can still use HOUNDS on our national forests [ndash] which of course [ndash] only chase the legal species. You can ride your OHV, your pickup with bar lights, your motorcycle, your snowmobile anywhere anytime. There are no regulations and no enforcement. There are domesticated livestock in excessive numbers eating the grass. Cattle suck up 25-30 gallons of water a day. Let[rsquo]s do some math. For a 200 AUM cattle allotment that means 5000 gallons of water a day. An elk drinks on average 4 gallons of water a day. There are roads everywhere. The only beaver I[rsquo]ve seen in the forests in the last 30 years was a dead beaver on the side of the road.

Social, Environmental and Economic Bene?ts - You state that hunting is an economic driver for our local economies. I don[rsquo]t agree. What I see consistently are guys in pickups hauling a camper, more often a toy hauler, but always a plus one of an OHV. They have bought their groceries and gas at COSTCO, pass through all the towns, drive as fast as possible up the USFS roads and camp. They might go to town for a hamburger, more alcohol, or gas. That[rsquo]s not much of an economic boost. I think in the past, when people used tents and coolers, more out of town visitors would stay in lodging, eat at restaurants, and shop locally. But that is not the predominant case these days. I would like to see our forests wildlife, ?sh, and foods reserved for taking by native people only.

More emphasis needs to be placed on preserving old growth, all growth really, as some of us know, the young are the next generation of the old. This helps with wildlife habitat and connectivity and corridors. Retiring and removing all but essential roadways will cover a multitude of sins. Preserve and Protect.

Assessing Social and Economic Sustainability and Multiple Uses [ndash] Does anything stay the same? Evolution: it[rsquo]s a thing. It[rsquo]s like wild?re, it[rsquo]s our friend. Without it, we[rsquo]d still be living in caves. So, there[rsquo]s lots of talk here about [ldquo]the way things were[rdquo] and [ldquo]the forest system was created to provide resources for timber, mining, and livestock.[rdquo] Has that ever really worked for the public good? Certainly, speci?c individuals or entities have pro?ted from a cozy relationship with USFS in the form of below market rates for raw materials including timber, grass, and minerals. It would be one thing if the USFS was charging market rates, but it is so far below market its absurd. In fact, I think it[rsquo]s a little unconscionable. I mean, doesn[rsquo]t the USFS have a ?duciary responsibility to the public?

And on top of literally giving away billions of dollars in raw goods to select individuals over the years since its inception, it has at the same time allowed the destruction of that resource. Kind of like biting the hand that feeds you [ndash] yes? So, for me the choice is continue extractive contracts/activities but only at market value AND with the new trilogy of management principles: Transparency, Accountability, Enforcement. The public has a right to know who, what, when, where, and how much.

Cultural and Historical Resources and Uses [ndash] I support more site evaluations, monitoring, and surveying to identify these resources. Preserving the remnants of European colonialism[hellip]..hummm, not so sure about that.

Areas of Tribal Importance [ndash] I don[rsquo]t feel I have a seat at this table. The USFS has a legal obligation to adhere to and honor Treaties.

Social and Economic Bene?ts and Conditions [ndash] My new ask is that the USFS include this language in addressing this subject: Transparency, Accountability, Enforcement. Historic activities and uses by humans across the forest have resulted in damage to resources, destruction to ecosystems, and displacement and extinction of wildlife and other species. The USFS has a ?duciary responsibility to the public for which these lands were set aside, to sustain and preserve for future generations, the biodiversity and habitat that are found only here. The importance of supporting the life systems in these areas cannot be overemphasized. And they must be preserved and protected as a full system for corridors and connectivity to the greater biosphere. Our life

depends on this. We cannot reside on this planet without clean air, potable water, and soils that support all life. Although historically, resource extraction provided often the only economic driver in most of the rural communities surrounding these forests, the forests themselves were never intended as an economic input alone. If the economic activity erodes the resource, it cannot be defended. It is also implied, that by continuing to have the USFS provide resources that jobs will be guaranteed, almost expected. Someone could get the idea that they are entitled to an economic benefit from our national forests merely by residing in near proximity to one. I think this notion is unfounded and misleading. There was a time in our history that rural communities reaped an economic benefit from forest resources. There was also a time in our history where there was no indoor plumbing, electricity, and we used horsepower. Again, evolution. In that time, most of our country was rural and our population was more evenly distributed in rural areas. That is no longer the case. The fact is, more and more, our rural communities are being inhabited by low-income individuals that tend to have substance abuse issues and are living farther from law enforcement assists their lifestyle. The other new inhabitant is the elusive and dangerous second homeowner. Lots of folks from the urban areas of Oregon, Washington, and Idaho are buying up relatively cheap real estate in these communities and either using them as rentals or as vacation homes. Again, their input into the local economy is negligible. The other cultural issue to consider besides driving up housing costs, is that they never leave their lifestyle behind. They will eventually want a McDonalds and prefer it to the local burger hut. See towns like Jackson Hole, Wyoming or Big Sky, Montana or Sun Valley, Idaho or Ukiah, Oregon. Look at who owns the property in those areas. They are at least 50% out of area addresses.

Rangelands and Grazing, Forest Management and Timber, Energy Resources, Minerals, and Geohazards [ndash] I call all this Extractive Commercial Use. I would briefly say here [ndash] time to end all commercial use of national forest. If any remain: TRANSPARENCY, ACCOUNTABILITY, ENFORCEMENT.

Existing Designated Areas [ndash] The criteria for establishing or listing new Wilderness designation needs to be revised. For example, when you do your [ldquo]restoration projects[rdquo] old roads are opened, new roads are made, and this takes areas out of consideration for Wilderness. As I[rsquo]ve said in previous comments, it is a tall task to find any inch of ground in the combined three forests that has not been marked by human activity. So, the criteria for designating Wilderness needs revision. There are Wilderness areas existing that are surrounded by OHV trails and roads. I would really like to see a fresh look at any type of motorized activity on land or water in our national forests and get it reduced to only what is necessary for maintenance. This would also address the chronic shortage of road maintenance funding.

Scenery, Recreation Settings and Opportunities, Infrastructure, Land Status, Ownership and Use - All these categories also come under a couple of questions for me to evaluate their need, and how they contribute to the overall sustainability of the forest system. Questions: Does this activity benefit the forest? Does this activity cause any damage and to what extent? Can this activity be achieved in another setting, outside the USFS? And then, TRANSPARENCY, ACCOUNTABILITY, ENFORCEMENT.

Conclusion [ndash] Again, thank you for the opportunity to be involved in and provide comments on this phase of the planning process. I would also like to add here, that while the USFS has worked with several agencies, government entities, and groups, I feel the public should be provided a list of these specially designated people. This is to be a democratic process not by proxy. It also concerns me that at some past public meetings, certain sectors, like county commissioners, have received some sort of special letter of understanding, not sure what to call it, but they got it by making demands and threats. I don[rsquo]t agree that the USFS should reward that type of behavior with special access to the planning process. Please share the list of people you have worked with outside of the public meetings and comment periods with the public.

Finally, I know so many of you are working hard at this, and I appreciate your efforts.

It is a tall order. I have a high degree of confidence that we'll get it right this time.

Respectfully,

Umatilla County landowner adjacent to USFS