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U.S. Department of Agriculture, USDA Forest Service

2025 Preliminary Draft Proposed Land Management Plan for Malheur, Umatilla and Wallowa-Whitman National Forests

Forest Supervisors Office, 236 pp

Re: Comments on the Preliminary Draft Proposed Land Management Plan for Malheur, Umatilla and Wallowa-Whitman National Forests (Draft Plan) and Timber Management

Dear Sir:

Enclosed are my comments on the Preliminary Draft Proposed Land Management Plan for Malheur, Umatilla and Wallowa-Whitman National Forests (Draft Plan) as my comments pertain to timber management.

My husband and I ran a saw shop in Baker City for many years. Our customers were loggers, woodcutters and Forest Service employees. When the 1990 Forest Plan was written, the economy in Baker County was thriving. The forest was open to everyone. There were timber sales, the forests were thinned and managed. The Ellingson Mill in Baker was a huge employer, and there were two mills in Grant County. We lost our mill in Baker and the two mills in Grant County because the Forest Service would not guarantee a supply of timber.

Today, Baker County is classed as a poverty county; our loggers and mill workers have all moved away, there are few family wage jobs, and service industry jobs don't pay very well. Due to long term mismanagement by the Forest Service, our forests have not been thinned or logged and dead and dying trees predominate. I tried to read the Draft Plan to see if new management of the forests was planned, or if the Forest Service planned to support local economies. However, I found the Draft Plan next to impossible to read.

My understanding is that the Draft Plan must comply with The Plain Writing Act of 2010, also known as Public Law 111-274, which requires all federal agencies to use plain language in all new and revised documents intended for the public. This means writing in a clear, concise, and well-organized manner, making information easily understandable and usable by the public. I kept seeing hundreds of abbreviations, like FW-ERCDIS-DC and MA2B-RNA-DC and it goes on and on. I did try to read the part on page 64, under desired future conditions for Local Communities, but all I could see was things like I should refer to FW-WTR-DC, FW-AQ-DC, FW-TRI-DC, FW-REC, and MAIA-DWA DCs. These Plan Component Codes, or abbreviations, which continue throughout the document, may mean something to the Bureaucrats, but they are distracting, and mean nothing to the ordinary reader.

When these abbreviations mean something that is important to the document, each should be written out in English. In addition, the reader should not have to thumb through the documents to find out the meaning of each of these abbreviations. In addition, the document mentions the appendixes and how the reader needs to refer to these. If there is something important to the subject being discussed, that information should be presented and be written in plain English. The Draft Plan fails to meet the intent of this law.

I did read in the introduction to the Draft Plan that the Forest Service wants a new Plan because the 1990 Plan did not anticipate catastrophic fires. But that is not the fault of the Plan, it is the fault of the Forest Service for not logging and thinning as the 1990 Plan advised they do. The Draft Plan is incorrect in saying that the 1990 Plan did not anticipate the pine beetle epidemic. In Chapter 2-4, the 1990 Plan states "Personal use of fuelwood is reducing a backlog of dead and down material left from timber sales and the mountain pine beetle epidemic". My husband and I sharpened saws for many woodcutters who were after the beetle killed timber.

I was told that the Draft Plan proposed increasing the buffer along dry stream from 50 feet to 150 feet. I found this on page 111, but there is no mention of this change in the Forest Products Section. This area is not riparian, and there is no reason to preclude timber cutting within this additional 100 feet. Also, whatever in the world "a distance equal to the height of two site potential trees" is, this is not clear and is completely confusing. And adding new Research Natural Areas if not needed. These are "designated in perpetuity" according to page 101, and once designated, they will never go away. All the National Forest lands need to be available to the public for logging, grazing, recreation and mining. People who want to sit around and study the environment in its natural state should go sit in one of the existing wildernesses. There are already more of them than we need.

It seems to me that the 1990 Forest Plan gave the right direction, the problem was that the Forest Service did not follow that direction. It's hard for me to believe that the Draft Plan will be a better Plan.

The Draft Plan must be withdraw and rewritten so it follows the Plain Writing Act of 2010. Once the Draft Plan is rewritten so it contains clear, concise information, I will be able to understand what is in the document and will be able to form additional comments.

I appreciate the opportunity to comment.

Alice Knapp

Concerned Citizen and National Forest User.