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First name: Frances

Last name: Preston

Organization:

Title:

Comments: LETTER TEXT:

Dear Forest Official:[ldquo]Federal Land Policy and Management Act (FLPMA), Section 202(c)(9): to the extent consistent with the laws, governing the administration of the public lands, coordinate the land use inventory, planning, and management activities of or for such lands with the land use planning and management programs of other Federal departments and agencies and of the States and local governments within which the lands are located.Following are my comments on the Plan Development and Scoping of the Preliminary Draft Proposed Malheur, Umatilla, and Wallowa-Whitman National Forest Land Management Plans comment due October 6, 2025. My name is xxxxxxxxxx representing myself as a citizen I live at xxx Street and receive mail at P.O. Box x, xxx, xxx my email is xxxxxx.ReflectionIssue: The Blues Intergovernmental Council (BIC) was used in a way that appears to violate the Federal Advisory Committee Act (FACA).Corrective Action: Suspend the use of the BBIC information in the Plan development until it is restructured to comply with Federal Advisory Committee Act (FACA) requirements for balanced representation and transparent public participation.Issue: Participation of Wallowa Resources May violate FACA. The Forest Service allowed Wallowa Resources to participate in the BIC without complying with public transparency rules under FACA.Corrective Action: Remove any content influenced by improper advisory groups, disclose their role, and restart a public planning process that complies with the FACA.New Legal Standards apply. Under the Supreme Court[rsquo]s Loper Bright decision, the Forest Service MUST now follow the law exactly as written. Courts will not just accept what the agency claims. This MEAN[rsquo]s the agency has to clearly show where in the law it has the power to close roads or restrict access, etc.As an objector in the Final Environmental Impact Statement (FEIS), draft Record of Decision, and Revised Land Management Plans (Revised Plans) for the Umatilla, Malheur, and Wallowa-Whitman National Forests. I reflect often on the March 14, 2019, memo to Glenn P. Casamassa, Regional Forester, Region 6 from Reviewing Officer for the Chief, Christopher B. French (Enclosure #3). Specifically the following[hellip][hellip][rdquo]In concluding the objections process, I am instructing you to withdraw the draft Record of Decision, FEIS, and the three Revised Plans. The existing Land and Resource Management Plans, as amended will remain in place.[rdquo][hellip]..I am confident that the [ldquo]information and data collected and analyzed, as well as the breadth of objection issues, can be used to inform your next steps.[rdquo] As you proceed, I EXPECT you to engage with local, State, and tribal governments, elected officials, the public and other interested stakeholders.[rdquo]2018 Objectors the ForgottenThe above memo and referenced wording are very important to those of us who Objected in 2019. We are never remembered and search each page for something that reflects our requests, needs, desires that we so carefully spelled out. Each of us giving you our input hoping that you will respect our requests and understand that what we tell you is true to our part of the Blue Mountains. What they are not telling us about the new plan is:[bull] It lays the groundwork for future road closures.[bull] Cross-country travel is effectively banned.[bull] Grazing and subsistence use are reduced.[bull] Public input from past comments has been ignored.Below are specifics as to my concerns regarding lack of a [ldquo]good faith effort[rdquo] by the Agency to provide us with [ldquo]information and data collected and analyzed, as well as the breadth of objection issues, can be used to inform your next steps.[rdquo] Specific to the request of Mr. French: The USDA Forest Service is once again moving forward with a major forest plan revision for the Malheur, Wallowa-Whitman, and Umatilla National Forests, but this time, they[rsquo]re doing so by quietly recycling much of the same content from the 2018 draft plan that was formally withdrawn in 2019. For rural communities that depend on access to public lands for woodcutting, hunting, grazing, and other subsistence uses, this raises serious red flags.The 2018 Blue Mountains Forest Plan Revision was withdrawn in March 2019 by then [ndash] Acting Deputy Chief, Chris French. Why? Because it fundamentally failed to reflect the public[rsquo]s needs. The agency acknowledged the plan lacked transparency, ignored valid objections, and failed to earn public trust. A Thousand Eastern Oregon residents, including county governments, tribal members, ranchers, and small business owners, had raised major concerns that the draft plan would restrict motorized access, close traditional gathering areas, and reduce the use of forest roads, critical to local livelihoods.Despite its formal withdrawal, the

Forest Service is now relying heavily on the same 2018 documents including the withdrawn draft plan, Environmental Impact Statement, and other planning materials to form the backbone of this new revision. According to their own 2024 Assessment Report, these outdated and previously rejected documents are being used as key sources of information and structure for the new effort. In effect, the agency is moving forward with a plan that the public already said [ldquo]no[rdquo] to and doing it before formal NEPA scoping has even begun. That undermines the legal intent of early public involvement under NEPA (40 CFR[sect]1501.9) and violates the spirit of the 2012 Planning Rule (36 CFR[sect]219), which requires public collaboration before a draft plan is developed. We[rsquo]ve seen this pattern before. In Montana[rsquo]s Bitterroot National Forest, the Forest Service withdrew a prior decision after objections, only to push forward with a revised plan that largely reused the same old information. That approach has landed the Forest Service back in court, with plaintiffs arguing that the revised plan ignored new public input and current science and failed to address earlier concerns. It[rsquo]s a clear reminder that withdrawn documents cannot simply be repackaged and reissued without consequences. For the communities of the Blue Mountains, this isn[rsquo]t about policy language or bureaucratic process it[rsquo]s about access. Roads that lead to firewood, hunting camps, cattle allotments, and irrigation infrastructure are lifelines in this region. Every time a forest green gate is locked, or a map is redrawn without input, it cuts deeper into the way of life that[rsquo]s existed here for generations for my family it is four. If the Forest Service moves forward using recycled planning documents without a fresh start, they risk repeating the very failures that led to the plan[rsquo]s withdrawal in 2019 failures that disconnected the agency from the people who live closest to the land. Local communities deserve a genuine planning process, not a rebranded version of a plan that already failed to meet the standards of transparency, accountability, and public TRUST. If the Forest Service is serious about working with Eastern Oregon, they must: (1) Start with new data and current conditions, not recycled assumptions from 2018; (2) Hold meaningful public engagement before writing another draft; (3) Recognize the subsistence, cultural, and economic value of motorized access to the forest; and (4) Respect the clear record of objections that led to the 2019 withdrawal. If the Forest Service wants to rebuild TRUST in the Blue Mountains, it needs to stop cutting corners and start listening for real this time. Local residents remember what happened last time, and we WON[rsquo]T stay silent while our future is decided behind closed doors using plans we already rejected. Issue: Local public input from past processes have been ignored, including over 1,000 comments supporting open access. Corrective Action: Incorporate prior public comments into the current planning record and respond substantively to all recurring concerns before issuing the 2025 Draft EIS. Recycling a Rejected Plan Following are examples of how the old plan is being recycled into the new: Demonstration of verification of [ldquo]Climate Change[rdquo] in 2025 document: Reviewed V2 document from January of 2025 and compared it against the V5 (May 9th, 2025, version) results below: Area Reviewed: Document Similarity. Finding: Very similar; V5 builds on V2 with added appendices and minor updates. Area Reviewed: Climate Change Content. Finding: Not removed; still integrated throughout V5. Area Reviewed: Transportation Infrastructure. Finding: Nearly identical; no policy change. Area Reviewed: Grazing AUM (239,000). Finding: Confirmed in both V2 and V5 unchanged. This tells us; i.e., Climate change is still in the document, and it[rsquo]s not supposed to be. The transportation infrastructure section is still travel management by stealth, and they plan on cutting the AUM[rsquo]s for grazing by 45% across the three forests. Similar process was used to verify 2018 Blue Mountains Forest Plan Revision and the 2025 Revision Drafts with 80% of the old text recycled. Remember Chris French ordered the Blue Mountains Plan withdrawn because it was confusing, thin on local economics, and nearly impossible to implement. The Forest Service was told [ldquo]Scrap it and start clean[rdquo]. Headquarters told them to fix three things, they fixed none. [bull] Simpler, clearer plan? Nope [bull] Meeting the Communities Needs? Not Close [bull] Genuine re-engagement with Communities on Plan Development? Not happening Side-by-side snapshot [ndash] 2014 Proposed. Revised LMP vs 2025- Preliminary Draft Proposal Reference Enclosure #1 Forest Plan must focus on the Law Passed by Congress: NEPA, 1969: Sec. 101{{42 USC[sect]4331}}, the Multiple-Use Sustained-Yield Act of 1960 (MUSYA) for national forests and the Federal Land Policy and Management Act of 1976. [ldquo](b) in order to carry out the policy set forth in this Act, it is the continuing responsibility of the Federal Government to use all practicable means, consistent with other essential considerations of national policy, to improve and coordinate Federal plans, functions, programs, and resources to the end that the Nation may 3. preserve important historic, cultural, and natural aspects of our national heritage, and maintain, wherever possible, an environment which supports diversity, and variety of individual choice. 4.

Achieve a balance between population and resource use which will permit high standards of living and a wide sharing of life's amenities.

Specific Document Comments follow:

Chapter 1 Introduction 2012 Planning Rule: Page 3, [Idquo]contribute to social and economic sustainability[hellip]and multiple uses that provide a range of social, economic, ecological benefits for the present and into the future[rdquo] The USDA FS has failed in this regard from closing roads denying 42 USC 4331 [Idquo]preserve important historic, cultural, and natural aspects of our national heritage[rdquo] and [Idquo]permit high standards of living[rdquo]. In the 1970s there were 5 timber mills and full employment in Grant County. Grant County population in 2018, 7,183 folks. 2024 shows 7,093 and in 1986 a number of 8,330 a drop of 15%. Now all the sawmills are closed with one of the factors being the USDA FS management. The unemployment rate in April 2014 was 10.5%, and April 1990 only 8.7%. Just from these statistics the USDA FS has violated the NEPA Act! The decline in the quality of life in Grant County is the direct result of Federal Bureaucrat's mismanaging our public land at the negative expense of our local culture, industry, prosperity, education, and stability of the population and citizens. How will the new Forest Plan improve Grant County's high standard of living? This Plan must address the deficiencies identified by USDA leadership in 2019. Include a plan standard protecting subsistence uses and ensuring access for local residents to continue traditional activities, not just Tribal communities. I do not agree with the overall [Idquo]Purpose of this Land Management Plan[rdquo] (Page 9) [Idquo]The Current 1990 land and resource management Plan[rdquo] may be old but still identifies and serves many of the same current needs. Providing us with open Forests and no designated routes on two of the three forests the exception is the Umatilla.[Idquo]Since the land management plans were approved[rdquo][hellip]new policies and priorities, and new information based on monitoring and scientific research have been implemented as needed with amendments being the most successful tool.[Idquo]To consider findings identified[rdquo] [hellip][hellip].need for change has been taken into account and implemented accordingly over the past 35 years.[Idquo]What is a Land Management Plan[rdquo][hellip].[rdquo]Decisions regarding site-specific work is analyzed at the project planning level[rdquo][hellip].this is the point where road closures and designated routes are identified the new language for [Idquo]Travel Management[rdquo] this needs to go away. [hellip]. [Idquo]Site-specific designation of roads trails, and motorized areas is outside the scope of forest planning and is addressed in a National Forest travel plan.[rdquo] [hellip][hellip].this is the point where [Idquo]Designated Routes and Travel Management[rdquo] are clearly spelled out project by project. This need to go away.[Idquo]Land management plans themselves do not compel any action, authorize projects or activities, or guarantee specific results. A project might be needed because of a discrepancy between current conditions and desired conditions or to respond to public need or plan objectives[rdquo][hellip][hellip] There it is right there in the first page of the written document telling us in so many words [Idquo]we will close roads, and designate routes project-by-project, like it or not Joe Public it will happen. Even though two Forest Supervisors, Malheur and Wallowa-Whitman issued formal letter in July 2025 identifying in June the Pacific Northwest Regional Forester issued Interim Guidance for Travel Management Proposals and Decisions to all National System Forests in Oregon and Washington with specific clarifying language how the Regional Forester's memo will be implemented. Reference Letter to Blues Intergovernmental Council Members dated July 31, 2025, File Code 2380;3180 from Ann Niesen, Forest Supervisor, Malheur National Forest. (See Enclosure #2)This is a game this is all being played at a very high level to make the public think it will happen, it will in the interim [Idquo]until the Blue Mountains National Forests plans are approved then immediately, if not sooner will be reinstated. How do I know this? Just read what I have referenced above from the very first page with specific information that being Page 9 and first paragraph in Page 10[hellip][hellip].Travel Management which means[hellip]. road closures, with designated routes project-by-project. This MUST BE stopped. Please explain in document with the truth or remove all reference. This is all very deceptive.Page 10 [Idquo]Plan Area[rdquo] [Idquo]Planning at the regional scale integrates forest management across national forest boundaries and improves services for those who use and visit the Blue Mountains National Forests. This is just another heads-up to announce future Travel Management, Road Closures, Closed Forests and oh yes, designated routes as currently exist on the Umatilla. This must not happen references to this must be removed.Page 12 [Idquo]Plan Components[rdquo] must be specific and spelled out as they relate to Travel Management, Closed Forests, and Designated Routes.Scale this is new; needs to be specific and spelled out as it relates to Travel Management, Closed Forests, and Designated Routes.Page 13 thru Figure 2 Page 15. [Idquo]Suitability of Lands, Geographic Applicability of Plan Components, Plan

Component Codes are all new and must be specific and spelled out as they relate to Travel Management, Closed Forests, and Designated Routes. This is also very complicated, not easy to associate or remember must be an attempt to make it easier to identify what is being done. I know things need to be abbreviated; however, this type of abbreviation will lead to lack of understanding and incorrect identification of specific elements.

Page 16 Social and Economic Characteristics. This reads like a Chamber of Commerce brochure identifying all the marvelous advantages of Grant County, this is not acceptable. The agency needs to tell the truth about the poverty level, economic, social, rural community raping by the State that is present as a result of the lack of jobs, state engagement, and lack of rural development, controlling our water resources, lack of funding for the Department of Transportation that has the potential to cost the lives of many East Oregonians.

Page 17 Residents and visitors alike seek out the national forests year-round for recreational opportunities. Activities range from seeking solitude in the backcountry to staying in developed campgrounds along travel corridors. Additional recreational activities include hunting, fishing, wildlife watching, rock climbing, hiking, off-highway vehicle use, whitewater rafting, and horseback riding. Hunters travel to the national forests in search of elk, deer, and antelope, during the appropriate seasons, which also contributes to local economies. The national forests also provide winter sports opportunities such as snowmobiling, cross-country, and downhill skiing. The local residence depends greatly on firewood as well. The USDA FS has failed in this regard from closing roads in the forest thereby inhibiting 42 USC 4331 preserve important historic, cultural, and natural aspects of our national heritage. And variety of individual choice. By closing roads, the USDA FS is purposely preventing our disabled veterans and seniors from use of portions of the forest!

Page 20 Project and Activity Consistency with the Plan/Determining Consistency. This is where the concepts that exist in Travel Management, Closed Forests with Designated Routes will live in the future. This is where each and every project that is identified will determine which roads will be closed, decommissioned, opened, built; where individual forest closures will be applied and for sure where designated routes will be established. This can not happen; however, if that is the future intention, I ask you to tell the TRUTH tell it like it is come clean and tell your publics exactly how this will play out do it NOW.

Page 21 Developing land management direction to respond to social, economic, and ecological conditions. The plan must be flexible and respond to the input from the local county government, local public, and citizens' desires residing in the local counties and their input and engagement should carry more weight in decision-making over someone outside the area especially those offering input east of the Mississippi.

Page 21 Use of Best Available Science. The BIC had a Social and Economic study conducted paid lots of money where and when will those results be published in this document have, they been verified and found to reflect the current situation not the 2018-2023 but rather the situation as it existed for 2023-2025 when the sawmill closed, and other industries have left the counties? Referenced on page 21 Assessment Report of Ecological, Social, and Economic Conditions on the Blue Mountains National Forests (September 2024) This document had NO PUBLIC INPUT that violates NEPA. Let us not forget Mr. French's March 14, 2019, letter where he states, Plans also did not fully account for the UNIQUE social and economic needs of the affected communities. If for no other reason, let you be driven by the direction of Mr. French. Reference March 14, 2019, 1570, Objection Response for the Umatilla, Malheur, and Wallowa-Whitman National Forests Revised Land Management Plans, to Glenn P. Casamassa, Regional Forester, Region 6 from Christopher B. French, Reviewing Officer for the Chief (Enclosure #3) Gold and other valuable minerals still exist beneath the land's surface. This should be changed to Gold, critical, strategic, to include 44 of the 50 rare minerals the Current Administration are trying to locate right here in Grant County Oregon.

Page 22 Rights and Interests. What about NEPA and Public input? No public input allowed during the interim negotiations during the Blues Intergovernmental Council (BIC) process. Need to add public input and ENFORCE the usage of coordinate or coordination with planning efforts of State, county, and local governments.

Chapter 2 Forest-wide Plan Components

Page 23 Air Quality. By not managing the forest for fuel loads and not putting out fires ASAP, the USDA FS is violating the Clean Air Act of 1970 and promoting severe respiratory difficulties for humans, and wildlife. Change need to be; immediate response to all fire starts.

Page 25 Guidelines (FW-SOIL-GDL) 03. soil disturbance, existing or past disturbed areas ADD: surface disturbances are allowed under the US mining laws. If you don't add please explain why not.

Page 26 Wildland Fire (WF). Introduction last paragraph Fire managers strive to manage the natural role of fire while protecting values from adverse fire impacts. ADD seasonal. If you

don't add please explain why not. Put out fires ASAP when conditions promote catastrophic wildfires! Wildfire is indeed a natural phenomenon in our Blue Mountains Forests, and fire has played a key ecological role for Dry Pine Forests east of the Cascades, which have historically been fire-resilient landscapes. Agree with the objectives in principle and the emphasis being put on firefighter safety and expanding partnerships with local entities; however, in relation to the Malheur National Forest, 30,000 acres of fuels mitigation annually is inadequate. Given that this objective is related to what the Malheur could ecologically sustain this figure should be closer to 85,000 acres annually. This is especially true when including natural fire in the figure. The 85,000-acre figure also aligns with the historical 20-year fire return interval on the Malheur.

**Desired Conditions (FW-WF-DC) 02.** [ ] reduce wildfire risks to communities. [ ] Citizens, firefighters, natural resources, capital investments, and private lands within the three national forests are at higher risk from uncharacteristic wildfire effects. [ ] The USDA FS continued priority to [ ] close roads [ ] or label [ ] historic used roads [ ], some currently used as closed prevent and retard wildfire abatement. Do not close the roads that we, as taxpayers, paid to open and build and if the roads are not used the road will naturally be reclaimed. From the last unauthorized Forest Plan [ ] Make an OPEN FOREST! It would be a win-win for the taxpayers to just leave the [ ] historic used roads [ ] (RS2477) as they are and those that use them will maintain them. The plan should prohibit closure, decommissioning, or obliteration of any road constructed before October 1976. These roads (RS2477) and access to the forest are our heritage. Thus, remove all language that supports the closure and decommissioning of roads while including a permanent plan standard prohibiting reductions in current and historic access levels for life. Add a desired condition that Mosaic-like patterns will exist on the landscape when wildfire works its way across a forest system in the Blue Mountain Forests. A mosaic pattern is closely associated with lower severity fire and allows for seed banks to restore burned areas at a quicker rate, leading to broader landscape recovery.

**Issue:** It undermines wildfire prevention by locking up lands and reducing active management in some zones. **Corrective Action:** Allow full access for fuel reduction, thinning, and active management across all management areas, including areas currently proposed for restrictions. Remove all language that supports the closure and decommissioning of roads. **Issue:** Prescribed fire is prioritized over mechanical treatment. **Corrective Action:** The plans prioritize prescribed fire, but limited road/cross-country access hampers implementation. The standard needs rewritten to ensure fire crews and equipment can reach treatment zones efficiently via a robust and access transportation infrastructure. These plans do not currently do that.

**Page 27 Objectives (FW-WF-OBJ)** The figures listed in the objective section should be much higher than currently listed. On the Malheur 30,000 acres of fuels mitigation treatments annually is not sufficient to make a meaningful difference in wildfire severity on the landscape, especially when including natural fire in this footprint. According to the Property and Environmental Research Center's interactive wildfire risk map, approximately 44% of FS lands in the Western United States are at [ ] severe wildfire risk [ ]. In Oregon Congressional District 2 (CD2,) this figure is around 54%. This would mean approximately 918,000 acres on the Malheur are at [ ] severe wildfire risk [ ], and this may be higher as this statistic is for the entirety of CD2. With 30,000 acres treated annually, we would treat only around 1/3rd of fire-prone acreage on the Malheur. Therefore, this figure should be around 85,000 acres annually, which would align closer to the amount of acreage on the forest at severe wildfire risk in accordance with the 20-year fire return interval. These figures need to be increased for the Umatilla and Wallowa-Whitman as well suggest you do that and update the information. If you decide not to change the numbers as requested, please so indicate in the EIS so the public understands why you did not.

**Examples of effective fuels mitigation treatments and practices are:** [ ] Widening the prescribed burn window by starting prescribed fires earlier in the fall [ ] Being proactive in seeking additional funds to pay for mechanical treatments and utilizing non-federal partners to do so. [ ] Setting a quota in acres (or miles of road) for strategic fire breaks.

**Management Approach (FW-WF-MAPR)** Focus on community protection areas and promoting fire-adapted landscapes and communities. Applaud the move toward coordination with local entities to achieve these objectives. **Issue:** Prescribed fire is prioritized over mechanical treatment. **Corrective Action:** The plans prioritize prescribed fire, but limited road/cross-country access hampers implementation. The standard needs rewritten to ensure fire crews and equipment can reach treatment zones efficiently via a robust and access transportation infrastructure. These plans do not currently do that. **Issue:** Wildfire is treated as a [ ] management tool [ ] **Corrective Action:** Allowing wildfire to serve restoration goals assumes that access for suppression and fuels management will

remain. The plans need to reflect access protections are necessary to retain those options. Page 29 Invasive Species. The Forest Plan has a big invasive species problem, and they need to stop denying that and start dealing with it the primary example of destruction and devastation by invasive plants is the Murderer's Creek management area including Murderer's Creek Wild Horse Territory. Please explain the denial and what you plan to do about more aggressive removal and treatment of invasive species. Page 31 Water Quality and Aquatic Ecosystem (WTR) On the forest-wide scale for water quality and aquatic ecosystems, the connections made to promote water quality that support healthy riparian, aquatic, and wetland systems is recognized. The mindful approach of building infrastructure near key aquatic areas, suggest by working with state, tribal, and local groups via partnerships across all the Blue Mountain Forests. Page 32, 07 [Idquo]National Forest System lands contribute to flow regimes and hydrologic connections that maintain water elevations[hellip].[rdquo] ADD. Investigate closely snowmelt water retention during restoration plans for OPTIMAL summer/fall stream flows. If you don't add please explain why not. Page 33 Management Approach (FW-WTR-MAPR) 01[hellip].[rdquo]Best Management Practices and mitigation as Conditions of Approval to support attainment and maintenance of aquatic and riparian desired condition.[rdquo] SHOULD ADD [Idquo]while preserving important historic, cultural, and natural aspects of our national heritage.[rdquo] If you don't add please explain why not. Page 36 Forested Vegetation (FOR) Support the general principles of this section in promoting diverse forest vegetation and structure and maintaining ecological integrity for wildlife while at the same time acknowledging human use and footprints on the landscape. By promoting mechanical treatments and wildlife habitat goes together, as reducing canopy cover allows for shrubs, and understory vegetation to thrive; therefore, as reducing canopy cover allows for shrubs and understory vegetation to thrive, therefore supporting ungulates and other wildlife. I feel that 130,000 acres of mechanical treatment on the Malheur is on the low side and may not sufficiently tackle the problem of degrading forest health, composition, and ecological integrity. This figure should be a minimum of 25,000 acres annually, to transition the forest closer to the historical range of variability. Suggest the numbers be increased for the Umatilla and Wallowa-Whitman as well. If not, please explain to the public why not. Page 37 Desired Conditions (FW-FOR-DC) Issue: Plans reduce active land management compared to the 1990 Plan. Corrective Action: The plans lack measurable treatment or harvest targets and de-emphasizes sustained outputs. Plan needs to codify open access and legacy road protection, making on-the-ground active management feasible again. Page 37 Objectives (FW-FOR-OBJ) 130,000 acres of mechanical treatment on the Malheur would not be enough to meaningfully improve forest health, composition, and structural/ecological integrity. In 2024 on the Malheur analyzed basal areas at locations near Crawford Creek and Lookout Mountain. Researchers found pre-treatment basal areas of 179 and 240 square feet/acre at the plot study locations. Though variable on a forest-wide scale, these metrics indicate that vast portions of the forest have catastrophically high-density levels. Thus, to achieve management targets, the objective should be to treat a minimum of 25000 acres via mechanical treatments annually. Suggest you increase the numbers for the Umatilla and Wallowa-Whitman as well. If not, please explain to the public why not. Issue: Plans reduce active land management compared to the 1990 Plan. Corrective Action: The plans lack measurable treatment or harvest targets and de-emphasizes sustained outputs. Plan needs to codify open access and legacy road protection, making on-the-ground active management feasible again. Page 46 Management Approach (FW-FOR-STR-MAPR). ADD include a priority for treatment areas closest to human habitation. If you don't add please explain why not. Page 50 Aspen, Woodland, Shrubland, Grassland, Meadow, other Non-forested Habitats (VEGNF). This section emphasizes non-forested habitats. Though small in landmass compared to general forest habitats, they are crucial in providing biodiversity and variable cover types for wildlife. I support the general objectives of maintaining juniper and Meadows and grasslands non-forested habitats in accordance with historical levels and preventing either expansion or encroachment of undesired species within or outside these habitats. The objectives for the section SHOULD BE considerably HIGHER in ACREAGE than currently listed across all three forests. I do NOT support Aspen restoration. Page 53 01 Objectives (FW-VEGNF-OBJ). Aspen restoration is not needed or necessary across the Blue Mountain Forests this section needs to be removed. Page 53 02 Juniper. Reducing Juniper cover to less than 10% in Sagebrush habitat on the Malheur on 800 acres per decade seems log given the degree of Juniper encroachment across the forests. Therefore, suggest 1200 acres on Malheur; would be achievable, and a more meaningful footprint for Juniper Reduction work over the course of a decade. There are concerns with the lack of

mention on juniper outside of sagebrush habitat, within forested vegetation and riparian areas. Juniper in these areas should also be addressed and included in the above acreage figure. If not, please explain why they will not be included.

Page 53 03 Meadows and grasslands. Maintaining only 5 meadows on each forest through conifer thinning seems MEAGER, given the projection on the Malheur for 6,000 acres of riparian restoration over the next decade, and the prominence of wet meadows throughout the forests. Therefore, it is believed 10% of wet meadow acreage should be treated or maintained annually, in order to conserve and grow this habitat under stress.

Page 60 Guidelines (FW-SPRSK-GDL) 04 [ldquo]To reduce disturbance to denning wolves[hellip]..[rdquo] CAUTION Promoting wolves on the forest is in direct conflict with NEPA. Preserve important historic, cultural, and natural aspects for humans. Humans removed wolves from these forests years ago and that is a historic, cultural aspect that impacts the elk and deer populations resulting in less economic activity during hunting season. The wolves drive wildlife from public to private land. There is not a greater impact on elk harassment than a pack of wolves.

Grant County Court has taken a formal position on Wolves as spelled out in Ordinance 03-01 adopted June 4, 2003 states[hellip]..[rdquo]the members of the Canis lupus family that were indigenous to Oregon, (Canis lupus fuscus [aka Canis lupus gigas]; Canis lupus Irri motus; Canis lupus youngi) are now extinct; Now therefore, the Grant County Court being fully advised in the premises, the Grant County Court ordains as follows: the keeping within Grant County of any Canis lupus (wolf) or any non-wolf member of the family Canidae not indigenous to Oregon; except the species Canis familiaris (domestic dog) is hereby prohibited within Grant County, Oregon[rdquo][hellip][hellip]Corrective Action: Assurance that you will investigate this Ordinance and provide for its verbiage in the Malheur Forest Plan specific to what wolves have been brought into Grant County and are allowed or not. If not allowed, what will be the plan to remove them from the county? If you decide not to do this, please explain why you have chosen not to include in the Plans. Inquire of other counties within the various Planning areas to determine if any such Ordinances or Resolutions exist. If so act accordingly.

Page 62 Tribal Rights and Culturally Significant Resources (TRI) Issue: Non-Tribal Subsistence Use is not protected the plans only mentions Tribal rights and fails to acknowledge rural non-tribal communities that rely on the forest for subsistence.

Corrective Action: Include a standard explicitly recognizing subsistence motorized access for rural residents as a valid cultural and economic use of the forest.

Page 64 Introduction. ADD firewood gathering a strong local custom and part of our local culture. If you decide not to add please explain why not.

Page 65 Desired Conditions (FW-TRSPT-DC) Issue: Road removal and decommissioning undermines access for management.

Corrective Action: The plans favor reducing the road system for [lsquo]efficiency[rsquo] without safeguards. Plan components need to directly prevent closure of legacy roads and require access preservation during projects.

Page 65 Transportation Infrastructure (TRNSPT) Introduction and Page 66 04. The quiet disappearance of Cross-Country Travel in the Blue Mountains Forest Plan. The US FS says its new preliminary draft land management plan for the Malheur, Umatilla, and Wallowa-Whitman National Forests is about [ldquo]balance[rdquo] and [ldquo]access[rdquo]; however, for anyone who rides, hunts, hauls firewood, or recreates using motorized vehicles off-road the reality is cross-country travel is being erased [ndash] without the agency ever saying so out loud. Transportation Infrastructure chapter of the plan on the surface, the language looks harmless, even supportive. [ldquo]Page 65 [ldquo]The road system supports land management activities, wildfire operations, recreational and hunting use, access to private land in-holdings and commercial ventures, and FS administrative needs.[rdquo] Page 66 [ndash] 04 [ldquo]The trail system accommodates current and reasonably foreseeable motorized and non-motorized recreational needs.[rdquo] Sounds good, right? Roads and trails for recreation, hunting, and motorized use. So what[rsquo]s the problem? What[rsquo]s missing is the Warning Sign. This section never mentions cross-country travel- not once. There[rsquo]s no discussion of open motorized use across the landscape. No mention of preserving long-standing access used for gathering firewood, hunting camps, or checking on livestock. Oh yes, there is a reason for that. The plan states: Page 65 [ldquo]Site-specific designation of roads, trails, and motorized areas is outside the scope of forest planning and is addressed in a national forest[rsquo]s travel plan.[rdquo] At first glance, this seems like a bureaucratic footnote; however, this is the doorway through which cross-country travel disappears.

Default closure under federal rule. Under the 2005 Travel Management Rule, all motorized travel is prohibited except on routes or areas explicitly designated as open. If the Forest doesn[rsquo]t say it[rsquo]s allowed [ndash] it[rsquo]s closed by default. When the plan says it[rsquo]s deferring those decisions to a future Travel Management Plan but provides no standard, no guideline, and no suitability statement supporting cross-

country travel it's setting the stage for a system where only designated routes remain and everything else becomes off-limits. The illusion of motorized access. The language in this section is carefully worded to suggest nothing is changing. It talks about maintenance of roads, cooperation with countries, and access for hunting and recreation; however, what it does not do is

- Commit to keeping any of the existing open areas for motorized use.
- Identify cross-country travel as a suitable use anywhere in the plan.
- Preserve traditional uses like hauling firewood or setting up hunting camps off trail!
- Protect legacy roads or trails that don't meet the new designation criteria.

Instead, the Forests quietly lays out a new system in which motorized access only exists on designated routes ---- and everything else is off-limits. Cross-Country travel erased by omission. There's no need to close the forest roads [ndash] if you just stop monitoring them at all. By failing to acknowledge or protest cross-country use, and by codifying a transportation framework that centers solely on designated roads and trails, the FS is building a new baseline [ndash] one that normalizes restriction and marginalizes traditional access. If you're someone who believes the forest should remain open for all --- not just for those willing to walk 10 miles into a trail system---then for YOU this is your warning. They Didn't Remove Travel Management they just renamed it. Forest Service plans uses [ldquo]Transportation Infrastructure[rdquo] to Hide Road Closures from the Public. We've done the document comparisons, reviewed the withdrawn 2018 Final Environmental Impact Statement (FEIS), earlier versions of the 2025 drafts here is what we found: The Forest Service has not removed Travel Management they've just removed the words. Travel management deleted from language, not from policy. In the 2018 FEIS the Forest Service referenced [ldquo]Travel Management[rdquo] 13 times they discussed:

- Route designation
- Motorized access limits
- Road decommissioning
- Reducing road density

In the 2025 drafts:

- Zero mentions, not once

The strategy is still there---only now, it's cloaked under phrases like:

- Transportation infrastructure
- Road system efficiency
- Environmental impact reduction
- Access priorities

The effect? They're still closing roads and restricting access just without calling it Travel Management. A direct comparison below:

2018 FEIS

- [ldquo]Travel management planning will designate roads and motorized trails[rdquo].
- [ldquo]Reduce road densities in habitat areas[rdquo].
- [ldquo]Routes not designated will be closed[rdquo].

2025 Draft

- [ldquo]Transportation infrastructure is evaluated to improve efficiency.[rdquo]
- Manage road networks to support resource protection.[rdquo]
- Roads are prioritized based on essential access and redundancy.[rdquo]

The words have changed[hellip]. the outcome has not. They did the same thing with Climate Change. FS staff claimed they [ldquo]removed[rdquo] climate change from the Forest Plan telling Baker County Commissioner they [ldquo]removed[rdquo] but the side-by-side comparison between 2025 v2 and v5 proves that's not true either. They just replaced the phrase with softer alternatives:

- [ldquo]Changing environmental conditions.[rdquo]
- [ldquo]System resilience[rdquo]
- [ldquo]Adaptive management[rdquo]

Same framework, same direction, just rebranded. They expect us to TRUST them. Please explain why they do this why can't they just be HONEST? When do we get an apology? Let us not forget: These entire Plans are a reboot of the 2018 Forest Plan that was withdrawn by Deputy Chief, Chris French in 2019 (See Enclosure #3) why? [ldquo]Because it failed to meet the needs of local communities, lacked transparency and didn't earn public trust.: Today, more than 80 % of the old plan is reused in the new one. They didn't rewrite it, they renamed it. What is at stake: If this plan is approved, here's what's coming:

- Road closures that limit access to fuelwood, grazing lands, and hunting areas
- Permits required to reach your own irrigation diversion, mining claim, family farm, community burial ground.
- Designated routes only even if that means miles of walking to your traditional use sites.
- Closed Forests

Issue: It quietly limits motorized access by using zoning and [ldquo]suitability[rdquo] rules that set up future road closures ignoring years of public comment not to restrict motorized access

Corrective Action: Remove or revise suitability designations to maintain current open routes and motorized use.

Issue: Cross-country travel is effectively banned in most areas, ending a long-standing use tradition, via the acceptance of the designation of routes as a standard in the plans

Corrective Action: Protect existing cross-country motorized travel opportunities throughout all three forests, especially for subsistence, hunting, and firewood gathering. Desired conditions, objectives, and standards should be written to do so.

Issue: Roads built before October 1976 can still be closed, despite their historic use and importance to local access.

Corrective Action: The plan should prohibit closure, decommissioning, or obliteration of any road constructed before October 1976.

Issue: The Plan sets the legal foundation for future Travel Management closures, despite claims that [ldquo]Travel Management is not in this



plan. [rdquo] Corrective Action: Remove all plan-level motorized use restrictions that predetermine Travel Management outcomes; require those decision to be made only through separate public processes. Issue: Motorized Access Not Protected - The plans fail to guarantee continued motorized access to roads and areas people have used for generations. Corrective Action: Add a desired condition that clearly states motorized access will be maintained forest-wide for all residents throughout life. Issue: Cross-Country Travel not allowed - Cross-country travel by ATV or pickup is no longer permitted, even where it [rsquo]s currently practiced. Corrective Action: Add a standard affirming that cross-country travel is permitted across the forests, unless restricted through a separate public Travel Management process. Issue: Legacy Roads may be closed [ndash] The plans allow roads built before 1976 (often protected under RS 2477) to be closed or decommissioned. Corrective Action: Add a standard that roads built prior to October 1976 cannot be closed, decommissioned, or obliterated under these Plans without a separate legal process. Issue: No Binding Language to Protect Access in Future Projects [ndash] Future Forest projects (like fuels reduction or restoration) are not required to follow any plan commitments to access. Corrective Action: Add a guideline requiring that all future project-level decisions must uphold forest-wide plan commitments to motorized access. Points of Concern: [bull] Motorized access is not protected. The plans should clearly state that roads and cross-country travel will remain available for access. Without that, our way of life and the ability to care for family and land are at risk. [bull] Cross-Country Travel must remain open especially in areas where families have accessed wood, hunting spots, or historical routes for decades, the plans should protect that use as a formal right, not a future decision. No road closure [ndash] OPEN FOREST. The roads that we, as taxpayers, paid to open and build and if the roads are not used the road will naturally be reclaimed. It would be a win-win for the taxpayers to just leave the [ldquo]historical used roads [rdquo] (RS 2477) as they are and those that use them will maintain them. These historical use roads are our historic and cultural heritage. Page 67 Management Approaches (FW-TRSPT-MAPR). Issue: Road removal and decommissioning undermines access for management. Corrective Action: The plans favor reducing the road system for [lsquo]efficiency [rsquo] without safeguards. Plan components need to directly prevent closure of legacy roads and require access preservation during projects. Page 70 Desired Conditions (FW-RECDEV-DC) 01 [ldquo]accessible to people of varying abilities and needs [rdquo] Closing historical used roads is purposely preventing our disabled veterans and seniors from use of portions of the forest! Page 74 Cultural Resources (Cultures) [ndash] Allow for subsistence use for other than tribal governments. Issue: Subsistence use is not protected, threatening access for hunting, firewood, and gathering needed for rural peoples living in rural Eastern Oregon. Corrective Action: Include a binding plan standard protecting subsistence uses and ensuring access for local residents to continue traditional activities, not just Tribal communities. Page 76, Table 8 Need documentation of calculations. Page 77, 03 Desired Conditions (FW-FORPROD-DC). Suggested advising as technologies are developed to utilize biomass, expand Table 8-9, pages 76-78 to accommodate. Be flexible. Explain how you will use this information. Page 79, 04. ADD: Post forest fire, replant local species of trees. If not, enough funds are available, at least plant disperse pockets of local trees so the forest can revitalize like they used to do when they practiced multiple use. If you decide not to add please explain why not. Page 81 Rangelands, Forage, Livestock Grazing (RNG) Issue: The Plans reduce grazing opportunities by lowering allowable forage and changing suitability designations. Corrective Action: Maintain current grazing AUM levels as the 1990 plan and suitability designations. Page 83 Objectives (FW-RNG-OBJ). [ldquo]Malheur NF: Currently managed at 104,095 AUMs annually. [rdquo] What is the yearly number since the last Forest Plan? Maintain current grazing AUM levels, as the 1990 plan and suitability designations across all three forests. Page 85, Introduction [ldquo]The Forest Service encourages mineral and energy development by working with claimants [hellip]. [rdquo] This statement is UNTRUE. The USDA FS takes ages to process mining permits and studies. ADD encourages mineral and energy development by processing studies, statements and permits timely while working with claimants [hellip]. See Executive Order dated March 20, 2025 [ldquo]Immediate Measures to Increase American Mineral Production [rdquo] . If this is not added explain why not. Page 86, 01 Standards (FW-MEG-STD). ADD Prospecting, geological mapping, surface sampling, and mining claim staking are casual mining activities. Closed roads are open to mineral entry and casual use. If you don [rsquo]t add please explain why not. Chapter 3 Management Area Plan Components Page 89, 06 (c) ADD Do not condemn, hassle, pressure, intimidate, or harass USDA, FS innholder [rsquo]s of private land to sell! If you don [rsquo]t add please explain why not. Page 90, Table 12, 2A, Malheur, Inventoried Roadless Area, 189,375 acres is grossly in error! Please

correct, if not please demonstrate accuracy. Page 92, Desired Conditions (MA1A-DWA-DC): 01. ADD should include from the Wilderness Act (definitions Wilderness Act first and second sentences) [ldquo]the earth and its community of life are untrammeled by man, where man himself is a visitor who does not remain[rdquo] and ([ldquo]an area of undeveloped Federal land retaining its primeval character and influence, without permanent improvements or human habitation.[rdquo] Thus public lands with historic roads and mines exempt the land from wilderness characteristics. If you don[rsquo]t add please explain why not. Page 94, Introduction. ADD at end of paragraph one [ldquo]Intermittent streams are not rivers[rdquo]. If you don[rsquo]t add please explain why not. Page 99, Table 19, Dixie Butte 12,208 acres is covered by used and historically used roads and dotted with signs of mining activity. This area has a history of being mined for strategic and critical minerals and is currently being explored by Federal Grant for these minerals. Thus, it is not roadless! I[rsquo]m sure there are other areas covered in these plans that have the same characteristics. Please identify them by name so we know who they are so we can monitor the correct inventoried Roadless Areas. If you won[rsquo]t do this then tell us why. Page 101 MA 2B Research Natural Area (RNA) Issue: New special designations like Research Natural Areas and recommended wilderness further restrict traditional uses. Corrective Action: Limit or remove new restrictive designations from the plans. Page 102, Table 22, Dixie Butte 335 acres is covered by used and historically used roads and dotted with signs of mining activity. This area has a history of being mined for strategic and critical minerals and is currently being explored by Federal Grant for these minerals. Thus, it is not a RNA! I[rsquo]m sure there are other areas covered in these plans that have the same characteristics. Please identify them by name so we know who they are so we can monitor the correct Research Natural Areas. If you won[rsquo]t do this then tell us why. Page 106, Table 26, Vinegar Hill 12,830 acres is covered by used and historically used roads and dotted with signs of mining activity. This area has a history of being mined for strategic and critical minerals and is currently being explored by Federal Grant for these minerals. Thus, it is NOT A SCENIC AREA! I[rsquo]m sure there are other areas covered in these plan that have the same characteristics. Please identify them by name so we know who they are so we can monitor the correct Scenic Areas. If you won[rsquo]t do this then tell us why. Page 109 MA2I Murderer[rsquo]s Creek Wild Horse Territory (WHB) (Malheur National Forest only). Desired Conditions (MA2I-WHB-DC). ADD 03 to clearly identify the Management Plan moving forward that will explain exactly the steps to be taken to revitalize this Management Area. Between prescribed fires that were allowed to burn out of control and the management decisions over the past 10 years to not manage the Invasive species specifically medusahead rye and ventenata this area once known across the World as paradise for wildlife mule deer, and elk is DESTROYED beyond recognition. The BLM and State of Oregon needs to be held accountable on paper, financially and to the fullest extent of the law for the role they play in this area the reason being is they have played the largest role of all agencies in the overall destruction. Specifics as to how the Wild Horse population will be managed is also a critical piece of information that needs to be clearly spelled out for the public to see especially as to how they will provide water, and food for both horses and cattle. If it is decided not to add 03 please explain why not. Page 111, Category 4. ADD Bullet 4 [ldquo]Put all intermittent, perennial streams with fish or non-fish in this category even though greater than 1 acre.[rdquo] If you decide not to add please explain why not. Page 112, Desired Conditions (MA3A-RMA-DC) ADD[hellip].that complement RMAs [ldquo]other than land used under the US Mining Laws and Executive Orders[rdquo]. If you don[rsquo]t add please explain why not. Page 113 Objectives (MA3A-RMA OBJ) The comprehensive approach that the section suggests is noticed. For objectives, 6,000 acres of Riparian restoration/maintenance on the Malheur over the next decade provides a good footprint for work to get done at a meaningful scale. Actions such as silvicultural thinning and seeding/planting are particularly important for the recovery of native riparian species. The adaptive approach to livestock management in Riparian Areas, specifically to maintain quality Riparian habitat and reduce streambank erosion is noticed. Using vegetation conditions and indicators as tools to guide livestock management provides a good approach that balances ecological health with economic benefits. Page 116, Management Approach (MA3A-RM-MAPR) ADD 03 [ldquo]Other than land used under the US Mining Laws and Executive Orders.[rdquo] If you don[rsquo]t add please explain why not. Chapter 4 Monitoring Program Page 127 Monitoring Program Objectives. This objective misses the mandate of Congress to [ldquo]permit high standards of living and a wide sharing of life[rsquo]s amenities[rdquo]. Thus, the USDA FS must monitor the local economies and the effects of these plans and individual projects on the local economy to insure a high standard of living. Rewrite this section to include these

words to assure local economic provisions into the future. If not, please explain why you are not doing a rewrite.

**Issue:** No measurable outputs for timber harvest, grazing, or fuels work.

**Corrective Action:** The absence of targets leaves the public without enforcement tools. Develop enforceable access provisions ensure the groundwork for implementing management remains intact.

**Monitoring Program FW-For-Obj, FW-FOR-DC.**

**Issue:** Plans reduce active land management compared to the 1990 Plan.

**Corrective Action:** The plans lack measurable treatment or harvest targets and de-emphasizes sustained outputs. Plans need to codify open access and legacy road protection, making on-the-ground active management feasible again.

**Monitoring Program FW-FORPROD.**

**Issue:** Logging is now tied to [“ecological need for economic sustainability”].

**Corrective Action:** The shift away from economic intent minimizes harvest outputs. The plans need to codify access for subsistence and economic use helps maintain the viability of local forest product economies.

Page 128 number 9 [“Social, economic, and cultural sustainability must be addressed in the monitoring program.”] This issue is not fully addressed in this document. There is a need for how the above sustainability will be monitored regarding the local economy, social and cultural impact of these plans. From historic data above, the USDA FS has been ignoring the NEPA guidelines, and the laws passed by Congress. Example being the past road closures in historic mining areas have precluded mineral access and exploration leading to a decline in mining activity and the jobs that could have been created. If you decide not to address in the documents please explain why not.

**ADD [“category 10”] [“The plan must be flexible and respond promptly to local input, comments and coordination with local governments”].** If you don’t add please explain why not.

**Appendix A Aquatic and Riparian Conservation Strategy**

Page 155 [“Northwest Forest Plan area.. it focuses first and foremost on broad-scale aquatic resource conservation and protection, coupled with strategically focused active restoration in priority areas (USDA, 2002)”] The NW Forest Plan SHOULD NOT focus first and foremost[...].but on the laws passed by Congress to [“preserve important historic, cultural, and natural aspects of our national heritage, and maintain, wherever possible, an environment which supports diversity, and variety of individual choice.”] PLUS [“achieve a balance between population and resource use which will permit high standards of living and a wide sharing of life’s amenities”] and Multiple Use. If you decide not to change this section, please explain why not.

**Appendix B Proposed and Possible Actions**

Page 174 Fire. General statement and request to change [“No prescribed fires during fire season. No program to allow our forests to burn because fires are natural during fire season. If you won’t change then please explain why not.”]

Page 177 Social and Economic Sustainability. The USDA FS has been doing a very poor job of this since the late 70’s. This section needs to be totally reworked to talk about what will be done to change this situation as it currently reads it’s the same old words that talk about the promises including all the categories; but no specific actions we need specific objectives tied to timelines and consequences. Let us not forget this is one of Mr. French’s specific action items (Enclosure #3) what you have in the current document is pathetic I know you can do better, get it done. If you decide to not rewrite, please explain why not.

**Issue:** Rural Cultural Traditions Ignored. Only Tribal cultural practices are protected, traditional uses by non-Tribal communities (e.g., hunting caps, woodcutting) are excluded.

**Corrective Action:** Recognize rural traditions as valid cultural practices under the National Historic Preservation Act (as Traditional Cultural Properties).

Page 178 Transportation Infrastructure. Bullet 2. There should be NO NON-MOTORIZED areas unless it is wilderness area passed by Congress. No closed roads. It would be a win-win for the taxpayers to just leave the [“historical used roads”] as they are and those that use them will maintain them. These historically used roads are our historic and cultural heritage. Clearly, this is where you are trying to maintain and replace your plans for travel management, closing, decommissioning of roads and establishment of designated routes and Forest Closures. Here is where it is obvious that all the Forest Supervisors have been dishonest with the public in Eastern Oregon in their promises to remove Travel Management. Now is the time to tell the Truth if in fact you are planning to close forests and designating routes because to the public those are your intentions.

Page 180 Minerals, Energy, Geology bullet #2 [“Processing mineral applications, operating plans, leases, licenses, permits, and other use authorizations efficiently and in a timely manner”]. The USDA FS has done a terrible job of this and are in violation of the MMPA of 1970 when and how will this be corrected? What is the timeline and who is responsible for what? Please include these specifics in the document. If not, please explain why not.

**Appendix C: Preliminary Species of Conservation Concern (SCC) List**

Page 182. Second paragraph [“best available scientific information”]

indicates[hellip]..[rdquo] ONLY if that science was conducted on the Forest in question. Scientific studies conducted elsewhere will be biased when applied to a different location, thus invalid. Population density studies on the forest relating to local habitat are the ONLY legitimate scientific studies. The list of species of conservation concern (SCC) is a Non-Governmental Organization environmental wish list and should be substantiated with local on-the-ground studies. Until this has been done those that have not been substantiated MUST be removed. All [ldquo]Revised Land Management Plans must be designed to sustain or restore habitat for SCC populations and ensure, to the extent possible, that these species can remain on the landscape over the long-term.[rdquo] Only after consideration of ALL of the US Laws passed by Congress to ensure multiple use, and [ldquo]Coordination[rdquo] Federal plans, functions, programs, and resources to the end that the Nation may preserve important historic, cultural, and natural aspects of our national heritage, and maintain, wherever possible, an environment which supports diversity, and variety of individual choice, plus achieve a balance between population and resource use which will permit high standards of living and a wide sharing of life[rsquo]s amenities.[rdquo]Are we Protecting Species or just restricting people? Over and over, environmental groups and federal agencies push for restrictions based on [ldquo]at-risk[rdquo] species that have high public visibility. Research has shown this bias clearly[rdquo]: charismatic animals get attention and protection whether or not their populations are actually declining. In many cases, the species is stable or even thriving but the idea of protecting it makes a great headline.[rdquo]The same playbook is being used here in Eastern Oregon in these Blue Mountains Forest Plan Revisions so-called [ldquo]protections[rdquo] for species that aren[rsquo]t even at risk are used as justification for closing roads and limiting motorized access. It[rsquo]s not about true conservation science it[rsquo]s about removing people from the forest, regardless of the facts.Our way of life; hunting, grazing, firewood gathering, recreation, and even access for emergencies depends on keeping our roads open. Closing them in the name of protecting species that are doing just fine is a smokescreen that takes away our access without addressing real management problems. Know this and assure us that you are not going to let this happen.

Appendix D: Scenic Integrity Page 192 first paragraph second sentence[rdquo][hellip]Very high to high scenic integrity indicates [hellip].[rdquo] Areas of high scenic integrity are overlaying past and future mineral development and contain known deposits of critical and strategic elements required by our national emergency and defense. The US Mining Laws have priority over scenic integrity and that must be identified in these forest plans. Please rewrite and so indicate how they have been identified in these Forest Plans. Should you decide to not identify please provide an explanation as to why not.

First paragraph, last sentence. Scenic Integrity objectives shall not interfere with multiple use and customary use, the US Mining Laws. Please identify these concerns and state how the section complies. If you don[rsquo]t explain the specifics, please tell us why you are not.

Appendix E: Recreation Opportunity Spectrum (ROS) Page 197The USDA FS continued priority to label [ldquo]historic used roads[rdquo] as [ldquo]close roads[rdquo] even though some are currently used to prevent and retard wildfire abatement while offering excellent recreation opportunities.DO NOT CLOSE the roads that we, as taxpayers, paid to open and build and if the roads are not used the road will naturally be reclaimed. From the last unauthorized Forest Plans [ndash] Make an OPEN FOREST! It would be a win-win for the taxpayers to just leave the [ldquo]historical used roads[rdquo] as they are and those that use them will maintain them. The plans should prohibit closure, decommissioning, or obliteration of any road constructed before October 1976. These roads and access to the forest are our heritage. Thus, remove all language that supports the closure and decommissioning of roads while including a permanent plan standard prohibiting reductions in current and historic access levels for the life of the roads.

Issue: ROS zoning outside wilderness is misused. The plan uses SPNM (Semi Primitive Non-motorized) or primitive zones in areas that are not wilderness, preemptively cutting off access.

Corrective Action: Rezone these areas as Semi-Primitive Motorized or Roader Natural.

Issue: ROS zones limit motorized use without justification. The plan assigns [ldquo]Semi-Primitive Non-Motorized[rdquo] zones to many areas without analyzing the effect on current motorized use.

Corrective Action: Require NEPA-level analysis on all ROS zone changes and add an alternative that protects existing motorized use.

Appendix F: Wilderness Evaluation Page 199From the Wilderness ACT. [ldquo]The earth and its community of life are untrammelled by man, where man himself is a visitor who does not remain[rdquo], and [ldquo]an area of undeveloped Federal Land retaining its primeval character and influence, without permanent improvements or human habitation.[rdquo] Therefore, public lands with historic roads and mines exempt the land from wilderness characteristics.

Revise the Forest Plan documents to reflect [ldquo]before

any designation of a proposed wilderness area, it must be required for the US agency managing that area to conduct a historic, current and potential geological assessment of strategic, critical and economic evaluation of the minerals in that area, including geological mapping, sampling and historic mining activity with a professional geologist's public report to be included. If you decide to not revise the document to include the above, please explain to the public why not.

Second paragraph The first step. paying special attention to Finally, the Forest Supervisors may recommend (step 4) areas for Wilderness designation. This is of great concern all three Forest Supervisors have stated publicly more times than once that there will Be no new Wilderness Designations. The GOTCHA (used to express satisfaction at having captured or defeated someone or something) here is each and every one of them knowing that they have the power to make that decision at any time is being TOTALLY dishonest and not worthy of their trust with the public. It is necessary during the EIS that there be a statement of assurance from each Forest Supervisor in the document that says there will be no new designated wilderness in these Forest Plans. If it is decided not to make this assurance statement, please state why so the public can understand.

Appendix G: Wild and Scenic River Eligibility Page 200

Corrective Action: Wild and Scenic River Eligibility should only contain streams and rivers that have significant surface water all year long and have no private water rights upon that surface water. Before any designation of a proposed wild and scenic river area, it should be required for the US agency managing the area conduct a historic, current, and potential geological assessment of strategic, critical, and economic evaluation of the minerals in that area, including geological mapping, sampling, and historic mining activity with a professional geologist's public report to be included. Request that you evaluate and consider these additions if unable to incorporate please explain why not.

Page 207, 208, and 209 Camp Creek, Big Boulder Creek, Granite Boulder Creek, Vinegar Creek, Murderer's Creek, Middle Fork John Day River, all have historic mining activity and the potential for future mining. Please so indicate in the narrative for future reference. If you don't include, please explain to the public why not.

Page 212, Standard Creek, a tributary of Dixie Creek, north of Prairie City, OR should be included in the Malheur National Forest that are not eligible due to being intermittent and the site of historic, current, and potential mining with geological evidence of strategic, critical and economic minerals in that area. This area amongst others on the forest, currently is being explored for strategic, critical, and economic mineral by USGS and DOGAMI.

Corrective Action: The Agency make note of this economic opportunity for Grant County and market it to the current administration for development to help with the poverty and suffering due to lack of work and dollars to the county. If you decide to not market this to the administration, explain in the Forest Plan why that choice was made.

General Comments: Why the Forest Plan Revision Matters Simply put, this revision process will establish policies within the plans that will significantly LIMIT, or even ELIMINATE, motorized access to about 95% or more of the public lands in Eastern Oregon. This means that activities like gathering firewood beyond 300 feet from a designated route with your pickup will be criminalized. Camping at the end of a non-designated route with your pickup and camper will also be criminalized. Accessing your preferred hunting spot via four-wheeler, side-by-side, jeep, or pickup on a non-designated route will be criminalized as well and the list goes on and on. What is meant by criminalized? If you are found violating the rule, you could face a fine of up to \$5,000 and/or one year in jail. This is for doing what your family has done traditionally; in my case over 5 generations. What they are not telling us about the new plan is:

- It lays the groundwork for future road closures.
- Cross-country travel is effectively banned.
- Grazing and subsistence use are reduced.
- Public input from past comments has been ignored.

The main issue for these forests and public lands is the economic and social well-being of the residences. Maintaining the infrastructure in local communities is important to the survival of each community in Grant County and all the other Forest Plan communities. The public does not support any alternative that uses the Purpose and Need and reduces road density, places the restoration and expansion of wildlife corridors, desired landscape conditions, or any forest impacts that are incompatible with multiple use and the economic and social well-being of the local communities. No new wilderness areas! Be reminded that the first documented industrial use of the natural resources on these public lands was by miners in 1862, and the mineral industry, even before the formation of the USDA Forest Service. When you look at the regional maps, they are dotted with prospects and mines. Multiple use of the public land must include the access and ability to prospect, explore, mine, and process minerals from and in the forest public lands. Therefore: Keep existing roads open. We built or paid for

these roads so do not spend our tax dollars to close any roads on public lands! By closing roads, the USDA FS is purposely preventing our disabled veterans and seniors from use of these areas. We need access for fighting fires, recreation, mineral exploration, timber harvest, gathering wood and mushrooms, hunting, snowmobiling, hiking, and camping. Road closures should only be temporary during emergencies, maintenance, relocation, and reconstruction as needed. Public access to the public land in these plans is part of our [ldquo]important historical, cultural and natural aspects of our national heritage, and maintain, wherever possible, an environment which supports diversity, and variety of individual choice.[rdquo] The USDA, Forest Service is required by Federal Law to Preserve this part of our Grant County[rsquo]s culture and historic USE. Suggestion on deer and elk and roads: Close only just a few roads during elk season for all hunters except for seniors over 60 and disabled folks who will have access. Do not close or decommission roads permanently! This is a list of exploitable or exploited mineral commodities recorded from the Blue Mountain region: Asbestos, Copper, Gold, Lead, Manganese, Mercury, Molybdenum, Platinum, Silver, Uranium, and Zinc. Mineral list containing elements from the Blue Mountain Region: Ag, Al, As, Au, C, Ca, Co, Cr, Cu, Fe, Hg, K, Mg, Mo, Pb, Pt, S, Sb, Si, Ti, V, Zn, Zr. The Blue Mountains are home to 37.14% of the 35 Critical and Strategic Minerals! These plans must specifically protest the closing of any RS 2477 right of ways to mining claims, either patented, unpatented or in the process of current or future exploration activities on the public US land unless withdrawn from mineral entry by the US Congress. [ldquo]The nature of Congress[rsquo]s grant of a [ldquo]right of way for the construction of highways over public lands, not reserved for public uses.[rdquo] Act of July 26, 1866, ch 262, [sect]8, 14 Stat. 251, 253, codified at 43 U.S.C. [sect]932. And [ldquo]The establishment of these rights of way[rdquo] required no administrative formalities: no entry, no application, no license, no patent, and no deed on the federal side; no formal act of public acceptance on the part of the states or localities in whom the right was vested.[rdquo] Id. Indeed, [ldquo]R.S. 2477 was a standing offer of a free right of way over the public domain,[rdquo] the acceptance of which occurred [ldquo]without formal action by public authorities.[rdquo] Id. (internal citations and quotation marks omitted). [ldquo]All that is required[rdquo] for title to pass [ldquo]are acts on the part of the grantee sufficient to manifest an intent to accept the congressional offer.[rdquo] Id. At 754, see also San Juan County, 503 F.3d at 1168 ([ldquo]A right of way could be obtained without application to, or approval by, the federal government. Rather, the grant referred to in R. S. 2477 became effective upon the construction or establishing of highways, in accordance with the state laws.[rdquo] (quoting Hodel, 848 F.2d at 1078). In general, these USDA FS Management Plans should be based upon [ldquo]sound science[rdquo] and engineering and MUST follow the US CODES. The USDA FS for the Planning Team must economically evaluate any loss of access and ability to prospect, explore, mine, and process mineral from and in the public land. It is very important to include technical experts from the mining industry, not just government bureaucrats and environmental consultants and NGO[rsquo]s to make recommendations on the mineral industry and sustained development on these public lands. In closing, I would ask that the development of the Draft EIS for the Blue Mountains Forest Plan be delayed until a full and balanced set of plans can be developed around the importance of ecological principles and economic viability of the communities these Forest Plan Areas serve. The Forest Service said, [ldquo]the forests will remain open.[rdquo] In public meetings, but the written plan doesn[rsquo]t guarantee this; immediately translate verbal public commitments into enforceable plan language that protects roads and forest use. Revise the Forest Plans to: [bull] Affirmatively protect open motorized access and cross-country travel. [bull] Remove or limit restrictive recreation zoning. [bull] Respect RS 2477 rights and pre-1976 roads. [bull] Recognize non-tribal subsistence use as a cultural tradition. [bull] Ensure legal compliance under Loper Bright, FACA, and NEPA. [bull] Open Forest [bull] No Designated Routes I respectfully request that the Forest Service revise the draft plans to protect motorized access, recognize rural traditions, and ensure that long-time users of these public lands are not excluded by vague zoning or process shortcuts. These plans should reflect the needs of the people who live here and rely on these forests, not just outside groups, or prior rejected plans. I ask that you carefully consider the real-world impacts these plans will have on families like mine. [ldquo]Federal Land Policy and Management Act (FLPMA), Section 202(c)(9): to the extent consistent with the laws, governing the administration of the public lands, coordinate the land use inventory, planning, and management activities of or for such lands with the land use planning and management programs of other Federal departments and agencies and of the States and local governments within which the lands are located.[rdquo] Thank you for this opportunity to comment with the hope that you will take my public input

[illegible]