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Organization:

Title:

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Purpose of this Land Management Plan

The National Forest Management Act of 1976 requires that the Forest Service develop a land management plan for every national forest. Land management plans provide the strategic direction for management of forest resources. The Malheur, Umatilla, and Wallowa-Whitman National Forests, also referred to collectively as the Blue Mountains National Forests, are revising land management plans under the 2012 Planning Rule (36 CFR 219.19). The 2012 Planning Rule guides collaborative and science-based revision of land management plans that promote ecological integrity of national forests while contributing to social and economic sustainability.

Revising land management plans for the Blue Mountains National Forests addresses the following purposes:

[bull] The current 1990 land and resource management plans are 35 years old and is due for a revision.

[bull] Since the land management plans were approved, there have been changes in economic, social, and ecological conditions, new policies and priorities, and new information based on monitoring and scientific research.

[bull] To consider findings identified in the Preliminary Need for Change to the existing land management plan.

This document is a detailed proposed action that provides all required elements of a revised land management plan. This proposed action was developed using the findings in the Final Assessment and the Preliminary Need to Change.

Comment: The bold and underlined above content is my emphasis.

Comment: Team members, using the 2012 planning rule is an appropriate method to address the changes in this 35-year-old plan and fortunate or not, many things have changed in the economic and social arenas in this short 35-year time frame in this area of concern.

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Social and Economic Characteristics

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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, aviating 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.

Comment: Team members, aviating (both commercial and private) has been around as long, if not longer than some of the above-mentioned recreational opportunities[hellip]I request you add the above verbiage (in red) to this paragraph of the draft plan.

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Maintaining and Adapting to New Information

The plan is an integral part of an adaptive management cycle that guides future management decisions and actions. Plan-level adaptive management includes:

- [bull] Assessing information relevant to the national forest.
- [bull] Developing land management direction to respond to social, economic, and ecological conditions.
- [bull] Monitoring management outcomes and changing circumstances.
- [bull] Revising or amending management strategies accordingly.

Comment: The bold and underlined above content is my emphasis.

Comment: Team members, this is a positive stance in using the 2012 planning rule components in the formation of this new plan.

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Local Communities (LOCCOM)

Introduction

The Blue Mountains National Forests are important to the resilience of local communities and Tribes because residents benefit from jobs and income produced from management activities, such as timber harvesting and livestock grazing. Mining, which is a statutory right, also produces jobs and income. The national forest also provides resources such as clean water and air, culturally significant foods relating to opportunities, berry gathering, and landscape settings that contribute to resident[s] quality of life and the character of local communities and Tribes.

Comment: The bold and underlined above content is my emphasis.

Comment: Team members, I[']d like to emphasize the many benefits to the yearlong residents of this three Forest area in the form of jobs and income and providing outdoor activities for these families.

Management Approach (FW-LOCCOM-MAPR):

01. The Blue Mountains National Forests engage with county and local governments, partner organizations, and the public in a learning and collaborative environment. Consider communities with social and economic conditions that are more highly influenced by changes in forest policy and management decisions.

Comment: The bold and underlined above content is my emphasis.

Comment: Team members, I'd like to emphasize the benefits of working with partner organizations, ie Aviation groups in the case of maintenance and upkeep.

Desired Conditions (FW-LOCCOM-DC)

01. The National Forest System lands have sustainable ecosystems that provide resources to Tribes, local communities, and visitors. These lands contribute to clean water, clean air, jobs and income, traditional foods and medicines, recreation, carbon storage, native species habitat, and forest products. See also FW-WTR-DC, FW-AQ-DC, FW-TRI-DC, FW-FOR-DC, FW-VEGNF-DC, and FW-FORPROD-DC.

02. Sustainable levels of forest resources such as timber, livestock grazing, fish and wildlife, recreation and wilderness experiences, contribute to the social, cultural, and economic sustainability of local communities. See also FW-FORPROD, FW-RNG, FW-SPDIV, FW-REC, and MA1A-DWA DCs.

Comment: The bold and underlined above content is my emphasis.

Comment: Team members, I'd like to emphasize that recreational aviation has been in place in this 3-forest area since the 1930s.

Transportation Infrastructure (TRNSPT)

Introduction

Transportation infrastructure includes the system of roads, trails and airstrips located on National Forest System lands that provide access throughout the national forests. Facilities infrastructure is addressed in the Forest-wide REC and Management Area MA5 sections.

Airfields are part of the Forest's Transportation Atlas and include the runway and any constructed feature such as vegetation clearing, ditches, signs, and other features that support the user and minimize the effects to other resources. The Airfield system supports both Federal and State land management activities, wildfire operations, recreational and hunting use, access to private land in-holdings and commercial ventures that support local economics.

Comment: The bold and underlined above content is my emphasis.

Comment: Team members. I'd like to emphasize that airstrips/airfields are a component of the USFS's nationwide transportation system and includes vegetation clearing to support a safe environment for the user and request you add the above verbiage (in red) into this section of the draft plan.

Desired Conditions (FW-TRSP-DC)

1. The forest transportation system of roads, trails, and airfields provides safe and efficient public, private inholding, tribal, and administrative access for recreation, special uses, forest resource management, fire management, and treaty related activities. The transportation system and its use support ecological sustainability and contributes to social and economic sustainability. Transportation infrastructure and its use are managed to avoid or mitigate undesired effects to ecological integrity and diversity and on resources including threatened and endangered species, species of conservation concern, heritage and cultural sites, watersheds, water quality and aquatic species.

Comment: The bold and underlined above content is my emphasis.

Scale

Forest-wide

Objectives (FW-TRSPT-OBJ)

01. Maintain forest roads.

Malheur NF: Approximately 400-600 miles of road annually

Umatilla NF: Approximately 150-300 miles of road annually

Wallowa-Whitman NF: Approximately 200-600 miles of road annually

02. Maintain trails.

Malheur NF: 100 miles per decade

Umatilla NF: 500 miles per decade

Wallowa-Whitman NF: 650 miles per decade

03. Maintain Airstrips/Airfields.

Malheur NF: Develop Airstrip Integrated Operations and Maintenance Plan with partners

Umatilla NF: Develop Airstrip Integrated Operations and Maintenance Plan with partners

Wallowa-Whitman NF: Adhere to Airstrip Integrated Operations and Maintenance Plan

Comment: Team members. I'd like to emphasize that airstrips/airfields are a component of the USFS's nationwide transportation system and need to be looked at objectively, just as our roads and trails are in this long-term draft Forest Plan. The Wallowa Whitman National Forest and the local aviation community put an Airstrip Integrated Operations and Maintenance Plan into place in 2022 that included objectives, operation conditions and desired conditions and request you put section 03 verbiage (in red) into this section of the draft plan.

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Management Approaches (FW-TRSPT-MAPR)

01. The forest transportation system is part of a broader public system of roads and trails, and airfields that is under the jurisdiction of multiple road agencies. Counties and adjacent national forests cooperate routinely to reduce conflicts, facilitate operations such as wildfire response, encourage cost effective partnering, and provide a seamless transportation system and user experience to the public which includes recreational opportunities such as hunting and camping.

02. To provide varied trail experiences, trail routes consider one or more of the following: create loop opportunities, connect developed recreation sites, provide access to destination overlooks, connect existing trails to larger trail networks, and connect communities to the Forest.

03. To provide quality trail experiences for forest users, trail maintenance priorities may consider trail use levels.

04. To provide varied airfield experiences, airfields connect to numerous trail systems routes and create opportunities that connect to many dispersed recreation sites and backcountry sites and connect communities to the Forest. Encourage cost effective partnering with aviation groups to provide a safe transportation system and user experience to the public which includes recreational opportunities such as hunting and camping.

Comment: Team members. I'd like to emphasize that airstrips/airfields are a component of the USFS's nationwide transportation system. Also, an important management tool is in partnering with aviation groups and I request you put the above verbiage (in red) into this section of the draft plan.

Recreation (REC)

Introduction

Sustainable recreation is defined as the set of recreation settings and opportunities that are ecologically, economically, and socially sustainable for present and future generations. The Forest Service manages three types of general recreational settings: developed recreation, dispersed recreation, and backcountry recreation. Recreational activities are also offered through special use permits with partners such as outfitter and guides, volunteer and non-profit organizations, and commercial ski area operators.

The Recreation Opportunity Spectrum (ROS) is the Forest Service's management tool to define, classify, allocate and manage desired recreation settings and opportunities. See Appendix E.

Desired conditions and other plan components under the recreation (REC) heading apply to forest-wide recreation. The plan also describes other general recreation settings (developed recreation, dispersed recreation and backcountry recreation) and provides management direction for specific opportunities and activities within those settings. See also plan components for RECDEV, RECDIS, and RECBCA.

Comment: The bold and underlined above content is my emphasis.

Comment: Team members. I'd like to emphasize that airstrips/airfields are not only a component of the USFS's nationwide transportation system, but they also allow the public to enjoy our Forests in both dispersed and backcountry recreational settings.

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07. Recreation special uses contribute to jobs and income in the local economy, community stability or growth, and quality of life while remaining compatible with ecological and social capacity thresholds.

Comment: The bold and underlined above content is my emphasis.

Comment: Team members. I'd like to emphasize that airstrips/airfields are not only a component of the USFS's nationwide transportation system but lend to the economy of local communities as well as their stability and quality of life.

Management Approach (FW-REC-MAPR)

01. Develop and sustain relationships with local communities, private providers of recreational services, partners, local, state and federal agencies, Tribes and other stakeholders to provide and support specialty services, such as backcountry skiing, jet boat and raft trips, aerial recreation opportunities, outfitting, and guiding services and events that encourage hunting and fishing on National Forest System land.

Comment: The bold and underlined above content is my emphasis.

Comment: Team members. I'd like to emphasize that airstrips/airfields are a component of the USFS's nationwide transportation system, and the Wallowa Whitman National Forest has partnered with local aviation groups to perform maintenance (per our Airstrip Integrated Operation and Maintenance Plans) on our airstrips to ensure safe aerial opportunities for both the public and state and federal management agencies.

Dispersed Recreation (RECDIS)

Introduction

Dispersed recreation settings offer a broad array of opportunities to users who require few developed site amenities. National forest camps, rental cabins, lookouts, off-highway vehicle trailheads, airstrips, and wayside interpretive sites are examples of minimally developed facilities that are rustic in nature yet appeal to those wanting to be more self-sufficient. The sites lack plumbing, paved surfaces, or potable water sources found in the developed recreation setting. Dispersed recreation settings tend to occur throughout the primitive to roaded natural recreation opportunity spectrum classes.

Comment: The bold and underlined above content is my emphasis.

Comment: Team members. I'd like to emphasize that the airstrips/airfields located in this three Forest Revision Plan area are in dispersed or backcountry areas. I request you put the above verbiage (in red) into this section of the draft plan.

Desired Conditions (FW-RECDIS-DC)

01. Dispersed recreation allows national forest visitors opportunities to recreate independent of developed recreation facilities. Encounters with other visitors are common along travel routes; however, activities away from developed facilities provide for fewer encounters.

Comment: The bold and underlined above content is my emphasis.

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Backcountry Recreation (RECBCA)

Introduction

Backcountry recreation includes use of roaded and unroaded backcountry, designated wilderness areas, and wild and scenic rivers.

This type of recreation occurs in the least developed setting and provides the greatest opportunity for solitude, risk, and challenge in environments of rugged, undeveloped landscapes. There are minimal facilities, creating more self-reliance and challenge for visitors. Existing facilities are generally rustic or primitive in nature. Trails for motor vehicle use and trails where motor vehicle use is prohibited are available in some areas but are not always open or maintained. Activities available in these areas often require self-reliance and higher levels of outdoor skills. Backcountry recreation settings tend to occur in primitive through semi-primitive motorized recreation opportunity spectrum classes.

Comment: The bold and underlined above content is my emphasis.

Comment: Team members. I'd like to emphasize that most of the airstrips/airfields located in this three

Forest Revision Plan area are in a backcountry setting.

Desired Conditions (FW-RECBCA-DC)

1. Backcountry recreation allows national forest visitors opportunities to recreate independent of developed recreation sites except for trailheads, staging areas, and other developed sites that facilitate backcountry access. Amenities are functional and are provided primarily for visitor safety, site protection, information, vehicle parking, and sanitary purposes. Materials used are rustic and minimal.

Comment: The bold and underlined above content is my emphasis.

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03. Recreation activities that require minimal amenities are available. The setting presents visitors with opportunities to experience solitude where backcountry skills and abilities are required.

Comment: The bold and underlined above content is my emphasis.

Guidelines (FW-RECBCA-GDL):

1. To provide high degrees of solitude and plentiful opportunities for risk and challenge, backcountry recreation settings should incorporate minimal recreation facilities generally at lower development scales when present at all and should typically employ managerial controls only when necessary for resource protection.

Comment: Team members. I'd like to emphasize that each of our three National Forests included in this revision plan have airstrips in place and in the case of the Wallowa Whitman National Forest, they are working with local aviation groups to perform year-round maintenance.

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MA 5 Developed Site and Administrative Area (DEVSITE)

Introduction

Developed site and administrative area include, but are not limited to, ski areas, developed campgrounds, airstrips, recreation residences, conifer seed orchards, administrative sites, communication sites, and utility corridors. Other land management plan standards and guidelines may not be met to meet the defined purpose of the developed sites and administrative areas.

Comment: The bold and underlined above content is my emphasis.

1. Administrative facilities and adjacent lands are safe, efficient, cost-effective, and are maintained at a function and use level that meets management needs. Facilities meet all applicable health, safety, and accessibility standards. The level of development of administrative areas, adjacent lands, and infrastructure, such as water and power systems, is based on need and is appropriate to support the site or area.

Comment: The bold and underlined above content is my emphasis.

Comment: Team members. I'd like to emphasize that the Wallowa Whitman NF has partnered with area aviation groups to ensure that our airstrips/airfields are kept safe.

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Guidelines (MA5-DEVSITE-GDL)

1. To prevent establishment of unwanted plant species, provide ground cover, and to stabilize the soil surface, developed sites and administrative areas should use native plants and seeds, when available, after construction or ground-disturbing maintenance activities requiring revegetation. See also FW-INV-MAPR-02.

Comment: The bold and underlined above content is my emphasis.

1. To provide a safe environment for employees and forest visitors, hazard trees, snags, and down wood that pose a safety threat should be removed. In these instances, desired vegetation conditions in this management area provide safe, efficient, and continued use consistent with the purpose of the developed site.

Comment: The bold and underlined above content is my emphasis.

Comment: Team members. I'd like to emphasize that the Wallowa Whitman National Forest, is working with local aviation groups to perform year-round maintenance which is referred to in the Airstrip Integrated Operations and Maintenance Plan for airstrips located on the Wallowa Whitman NF.

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Management Approach (MA5-DEVSITE-MAPR)

1. Consider partnerships, agreements, or other arrangements for occupation and use of buildings and facilities when the Forest Service no longer has a need to occupy them.

Comment: The bold and underlined above content is my emphasis.

Wallowa-Whitman National Forest

The Wallowa-Whitman National Forest is in the northeastern corner of Oregon and the west central edge of Idaho. The complex geological history of the area including floods, volcanic eruptions, landslides, and erosion has shaped the landscape into a unique combination of landforms and vegetative patterns. Elevations range from less than 2,000 feet at the bottom of Hells Canyon, the deepest gorge in North America, to nearly 10,000 feet at the top of the Wallowa Mountains in Oregon and the Seven Devils Mountains in Idaho. The landscape varies with deep river canyons layered with gently sloping upland benches that are vertically cut by steep, V-shaped drainages. Rocky outcroppings and high peaks of about 9,000 feet protrude along the backbone of the Elkhorn, Wallowa, and Wenaha Mountain ranges. This combination of geology and topography produces a distinctive, mosaic pattern of dense, heavily forested slopes interspersed with open, rugged shrublands and grasslands. Sparse scattered ponderosa pine and junipers dot the landscapes. Hidden natural treasures including alpine lakes and meadows, ponds, reservoirs and flowing rivers and streams provide aesthetic recreational settings throughout the area.

Comment: Team members. I'd like to suggest you change 2000 feet to 1000 feet in the above paragraph because the elevation of the Cache Creek airstrip (OR62) located along the Snake River near the Washington/Oregon state line is 893 feet.

To the Three Forest Revision Planning Team Members,

I'm respectively submitting my comments and suggestions to you today regarding your Preliminary Draft Forest Revision Plan for the Malheur, Umatilla and Wallowa Whitman National Forests.

I hope you will give my comments, suggestions, and thoughts some sincere thought and remember that this plan will be here for a long time (yep, the last one has been in place for 35-years) and will provide guidance to many of you and future USFS employees over the life of this plan. Including aviation in the suggested items will maintain sustainable and safe aviation access within the USFS Transportation System for many years in the Malheur, Umatilla and Wallowa-Whitman National Forests.

I've been an active pilot since 1975 and have flown to airstrips located in Northern Nevada to Central Alaska with most of my flying time spent here in the Pacific Northwest. As a private pilot I have flown into most of the airstrips located in this three Forest area hundreds of times.

I'm an Oregon State Liaison for the Recreational Aviation Foundation (RAF), an Idaho Aviation Association (IAA) Director and the Backcountry Committee Chairman for the Oregon Pilots Association (OPA), with a combined total membership of approximately 14,000 aviation enthusiasts.

During my 30-year career with the Oregon State Police (OSP) as a Fish & Wildlife Officer, I conducted many horseback patrols in the Wenaha, Eagle Cap and Hells Canyon Wilderness areas as well as running the OSP jet boat on the Snake River in Hells Canyon for 25-years. I've also spent many hours in an OSP aircraft in the

skies over NE Oregon. While conducting these enforcement patrols in aircraft, jet boat and on horseback, we've used many of the airstrips included in this plan area for enforcement purposes, medical evacuations and search and rescue efforts.

My sincere thanks for your efforts.