

Data Submitted (UTC 11): 10/4/2025 7:00:00 AM

First name: Loren

Last name: Stout

Organization:

Title:

Comments: I am going to attach my comments

Dear Blue Mountain Forest Revision Team,

I am a life long resident of Grant County, except the time I was in school at the U of O. When I was out of school I came back to Grant County and logged for 33 years. When the logging started to fail my wife and I bought a ranch in the Murderers Creek area. We run cattle on the DGA and then acquired a 300 head permit on Deer Creek. We have since sold but still reside in Grant County.

The first thing that stood out to me was on page 21 under the heading of: use of best available science. It states the 2012 planning rule requires the responsible official to use the best available science when laying out a project. It also stated that an ecological, social and economic assessment report dated Sept. 2024 was the foundation for this revision. It also claims using the best available science. It is just hard to believe this requirement has been adhered to from the time it was implemented. From the negative environmental results it should be quite clear that the responsible officials were extremely biased in their interpretation of the science or the entire concept is flawed and should require a complete makeover.

Page 81 range land, forage, livestock grazing paragraph 02: Non native grass species are present but do not cause environmental harm. These are not the places that need to be addressed. It is the 100,000[rsquo]s of acres that is not being looked at that need the immediate attention. Page 30 paragraph 01 claims: the Malheur will treat 3000 acres of these invasive species annually. If you are serious about confronting this environmental disaster it going to take a lot more than that. Page 82 paragraph 05 claims: the invasive species will be treated so that when they burn it will be in a mosaic pattern. That is not even being realistic. Last year in one day the fire in the medusa head and other invasive grasses burned 61,000 acres in hours. Not much of a mosaic pattern.

Page 94 Introduction Wild, Scenic and Recreational Rivers: The paragraph explains how the management applies to river systems designated under the Wild and Scenic Rivers Act. It explains what the steps are to obtain this status. It is a very arduous process with a lot of public input. The problem is the citizen of these three forests (Umatilla, Wallowa-Whitman, and Malheur) witnessed a process that tried to circumvent the steps that are very clearly laid out in the Wild and Scenic Rivers Act.

Furthermore, I would like to emphasize the importance of including local stakeholders in the decision-making process. The long-term health of our forests and rangelands depends not only on scientific assessments but also on the lived experiences and knowledge of those who have worked these lands for generations. Without genuine collaboration and transparency, public trust will continue to erode, and the effectiveness of management strategies will remain questionable.

At the whim of two federal senators, environmental groups, and the testimonial OK from the Forest Service the River Democracy Act was set into motion. It is not surprising, but from a citizen perspective why would this be included in a forest plan if it can be implemented without following the steps provided by the Wild and Scenic Rivers Act. It puts out the very clear perception that the forest service, regulatory agencies, and conservation groups are being used to shut down the rural West.

Page 109 Murderers Creek Wild Horse Territory 01: Support for a viable wild horse population by producing healthy ecosystems and land stewardship activities. The time for this approach is long gone. The citizens of Grant County tried to raise money for research to try and combat the environmental damage being done by invasive species but the BLM would not even allow the scientist on the ground to do their studies. The silica based invasive plants now have taken over most of the wild horse territory. The new NEPA document on the horses would not even address the #1 environmental disaster facing the animals. Couple that with ODFW fencing off critical water on federal ground, the horses and game animals are going to dwindle more than they already have. I saw something last winter that I never thought I would see. Horses starving to death because the only thing they had to eat was silica based plants. They went into the winter with a low body score and a hard winter took its toll. Not a pretty site and most of it due to the lack of attention given to an environmental disaster that cannot be pinned on the resource industries. This is the same drainage's the ODFW and NOAA fisheries fenced off miles of riparian and changed the natural dynamics of the creeks to the degree it killed a lot of our native steelhead. Also a place where the ODFW and NOAA fisheries got caught manipulating the science to try and cover up their involvement in their destruction of the South Fork drainage.

02 of page 109: Meet big game populations agreed upon by the Forest and ODFW. This is just another way of covering up the mismanagement of the Murderers Creek Wild Horse Territory as well as the Murderers Creek Wildlife Area. The only thing the mitigation efforts have done for this area is to degrade the once vibrant ecosystem, and nothing in this document looks to address this. In fact it is just the opposite. I was always told the forest service had nothing to do with the State-owned animals and now you are agreeing on the big game numbers. The forest service is just covering for the environmental disaster the ODFW has created on our federal ground.

Page 155 Aquatic and Riparian Conservation Strategy: From most of the dates referring to this strategy, I would conclude the bulk of them originated in the 1990's. The trouble is a lot of these strategies did not work and actually hindered riparian recovery. The money became such an issue, a lot of the projects were meant to fail so the legal and project money kept flowing in. It soon turned into billions of unaccountable funding. As one of the environmental groups that worked on the River Democracy Act so eloquently stated [quote] It is all about the Benjamin's [quote]. I will just give a couple of examples. The conservationist on the Middle Fork of the John Day River did a project and a study by their peers that concluded they were doing it wrong. Instead of trying to figure out a better way they received more funding to do the exact same thing. The result was major destruction of the Middle Fork system. Another example, Murderers Creek and Deer Creek. When it was pointed out that it was the mitigation that was creating most of environmental damage, the regulatory agencies just kept up their facade and now the public has nothing. Until there is some data that is not being tainted for political gain this ARCS system may need some refinement.

Page 169 Whole Watershed Approach and Partnerships: The last sentence of this paragraph is a perfect example of what I just tried to convey. [ldquo]Coordination also enhances skill and funding sources needed to sustain multi-year programs.[rdquo] It is not the results that matter, it is how much money can be generated and how long it can drag out to keep the money flowing.

Page 175 and 176 Aquatic and Riparian Ecosystems: You have eight actions listed that may occur if you need to improve a natural system. The question I have is do you have data that correlates to these activities actually improving an ecosystems function. These are the same ones that have been used for a long time and very little is improving using these methods. As a matter of reference, in the South Fork of John River you can start seeing the decline of our fish runs when the mitigation efforts started. It has been pointed out many times the riparian fencing has an adverse affect on the environment. Does not matter because of the ability to produce a lot of money for the conservation groups. The outcome is not what was promised.

Page 180 Minerals, Energy, Geology Sounds good

Page 182-191 Preliminary SCC List: This is a very extensive list. There is a similar list that was produced by ODFW and US Fish and Wildlife. Apparently it was just ratified and going to the US Fish and Wildlife for their blessings. When asked at a forest plan meeting what the ramifications of the State of Oregon[rsquo]s SWAP program would have on federal ground, there was not a response to our inquiry. The reason we asked was because this SWAP list was created behind closed door with only the environmentalists and ODFW were privy to the final product. The public has witnessed this scenario many times. This is not a coincidence that the Forest Service personnel would not answer the question and then came up with a similar list in a similar fashion.

Page 199 Wilderness designation: In my opinion Step 4 of the wilderness designation summarizes most of the forest plan. It states the forest supervisors may recommend (step 4) areas for wilderness designation. We had been assured early in the forest plan process the wilderness designations were off the table. Must have forgotten about step 4.