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Organization:
Title:
Comments: Hello, to whom it should concern;

I offer the following scoping input to the planning process that I understand is beginning for the Malheur, Umatilla, and Wallowa-Whitman National forests - - largely in the Blue Mountains of Eastern Oregon and South-eastern Washington. It is fundamentally essential that these up and coming plan revisions DO NOT WEAKEN the environmental protections that have been in place for the management of these forests - - many of which have been in place for decades.

I am a retired University Professor, where I taught courses (for over 45 years) on forest ecology and also sustainability focused courses that developed important knowledge about biodiversity, climate, and the ecology of our Pacific Northwest Forest ecosystems. I have done aerial photography of management activities over all of the forests involved in this planning process. It is also worth noting that I was involved in documenting the burns done during the "Hungry Bob", fire and fire surrogates study in the Blue Mountains of Northeastern Oregon, specifically within the Wallowa Valley Ranger District of the Wallowa-Whitman National Forest. I also supported the Roadless Area Protection Rule, which has played an important role in protecting many fundamental forest ecosystem values.

In this context, I strongly oppose the U.S. Department of Agriculture's more general proposal to rescind the 2001 Roadless Area Conservation Rule under the rationale of increasing timber supply and addressing wildfire risk. Rescinding the Roadless Area Conservation Rule will only accomplish the above "objectives" with huge and inappropriate environmental costs. I urge you to carefully consider any of your present decisions that affect the historic Roadless Area Conservation Rule protected locations. As I am sure you understand, the spirit of the protections provided by the Roadless Area Conservation Rule can be provided even without an explicit rule. However, substantial care must then be taken. Please see the following group of paragraphs that specifically addresses aspects and impacts of taking actions to rescind the Roadless Area Conservation Rule protections in the Blue Mountains region:

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1) Roadless areas are among our most intact, wildlife-rich, and climate-critical forests in the United States. They provide critical habitat for hundreds of wildlife species, including wolverines, Canada lynx, salmon, and numerous bird species. By maintaining large, un-fragmented landscapes, these areas ensure that wildlife will have the room they need to roam, feed, breed, and adapt to a changing climate. Road-building and logging in these areas will fragment habitats, disrupt migration corridors, cause erosion, as well as pollute rivers and streams with sediment. This will result in and accelerate population declines of already vulnerable species.

Remember, that roadless areas are important refugia that protect a range of species that we still do not know the importance of. That protected biodiversity in the roadless areas contains answers to questions that the scientific community still does not know enough to even ask the appropriate questions about.

2) With the presently accomplished additional 25 years of "Roadless Area Conservation Rule" protections, these even older areas of forest are now acting in an even more protective manner as they sequester and store vitally important Carbon Dioxide from the atmosphere. The push to log in these areas represents an important negative impact, exacerbating the accelerating climate change problems we are facing. Climate change impacts need careful quantitative analysis and modeling, if you choose to proceed with modifying forest plans to login roadless areas. Climate change impacts alone, argue powerfully against eliminating the Roadless Area Protection Rule

protections in your planning processes. The 2012 IPCC report also clearly states that - - - Protecting existing natural forest ecosystems needs to be the highest priority for meeting the needs created by the climate crisis.

Please note, the present administration's focus on ignoring climate change science is not a viable long term approach to define our relationship to the environment. If our country and its economy are to prosper over the long term, there is a critical need to appropriately attend to the insights derived from real scientific information that is presently being ignored.

3) Roadless areas are commonly in headwaters portions of watersheds, therefore management impacts on water supply quantity and quality are likely to be substantial. Roadless areas are disproportionally on steeper terrain. Therefore, watershed impacts of deciding to log in roadless areas needs careful analysis of watershed impacts and impacts on the quality of water supplied from these areas. This is an especially important area where there is a need for a careful risk - benefit analysis that includes not only human use but also impacts on threatened and endangered fish species.

Communities downstream of logging sites need to be held harmless if there is any degradation of their water quality or quantity caused by road building, logging, or erosion caused by wind-throw of trees near boundaries of clear-cuts. I have witnessed logging related loss of water quality that required expensive improvements in water treatment, where the local people had to bear the costs.

4) Serious consideration needs to be paid to building roads into already protected roadless areas. The problem in this situation is that these areas are commonly roadless for a reason - - building roads into these areas was so difficult and expensive that the value of the timber being accessed represented a money losing proposition. This is likely to ultimately contribute to more red ink being created by the USFS timber program, to say nothing of the pressures on the USFS staff to support this logging, while suffering the budget cutbacks that I have heard about recently.

5) In addition to the above mentioned impacts, allowing road construction and logging will increase human-caused wildfire ignitions. Scientific evidence indicates that the most effective wildfire mitigation effort needs to occur near communities - not deep in remote wild-lands where the roadless areas are mainly located..

The Roadless Rule has safeguarded substantial ecological and economic values for more than two decades. Taking actions that maintain the protections of the Roadless Rule, irrespective of its "official" status will be fundamental for appropriate forest management. Weakening its protections would benefit a narrow set of industrial interests at the expense of the public, wildlife, biodiversity, and the climate.

I urge you to maintain the Roadless Rule protections in principle, if not in clear articulation. Protecting these last wild forests is an investment in our nation's biodiversity, climate stability, clean water, and outdoor heritage. Remember especially, the twin crises we are confronting at present, both CLIMATE CHANGE and BIODIVERSITY.

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In addition to the above issues that relate to building roads and beginning to log in historic protected Roadless Areas, I would like to offer some additional important inputs into the characteristics of your planning process. The new forest plans that come out of your present planning process need to contain strong, enforceable requirements that management actions need to meet. This approach will minimize future conflicts, because your future management actions will have been well documented and will hopefully be clearly stated. Weak "guidelines" just invite endless conflict.

There is important recent scientific analysis as well as Native American insight that contributes to documenting

the fundamental importance of the Blue Mountain Region for many reasons, including migration corridors especially for larger species and climate change mitigation. This kind of fundamentally important background needs to inform your planning process; see especially the work of B. Law and D. Mildrexler*. (*His research highlights the critical role of large-diameter trees in supporting carbon storage and forest biodiversity and includes the development of a forest vulnerability index to assess drought and temperature stress in Pacific Northwest forests."

The classic paper produced by the "Eastside Forests Scientific Society Panel", published in 1993 also contains relevant insights that you should carefully and explicitly consider as you engage in this present planning process:

6A) "Do not log late-successional/old-growth forests in eastern Oregon and Washington."

6B) "Cut no trees of any species older than 150 years or with a diameter at breast height (DBH) of 20 inches or greater."

6C) "Do not log or build new roads in aquatic diversity management areas (ADMAs)."

6D) "Do not construct new roads or log within current (1) roadless regions larger than 1000 acres or (2) roadless regions that are biologically significant but smaller than 1000 acres."

6E) "Establish protected corridors along streams, rivers, lakes, and wetlands. Restrict timber harvest, road construction, grazing, and cutting of fuelwood within these corridors."

6F) "Prohibit logging of dominant or co-dominant ponderosa pine from Eastside forests."

6G) "Prohibit timber harvest in areas prone to landslides or erosion unless it can be conclusively demonstrated by peer-reviewed scientific study that no associated soil degradation or sediment input to streams results from that harvest."

6H) "Prevent livestock grazing in riparian areas except under strictly defined conditions that protect those riparian areas from degradation."

6I) "Do not log on fragile soils until it is conclusively demonstrated by peer-reviewed scientific study that soil integrity is protected and that forest regeneration after logging is assured."

6J "Establish a panel with the appropriate disciplinary breadth to develop long-term management guidelines that will protect Eastside forests from drought, fire, insects, and pathogens.")

6K) "Establish a second panel, to produce a coordinated strategy for restoring the regional landscape and its component ecosystems. Emphasize protecting the health and integrity of regional biotic elements as well as the processes on which they depend."

In relation to 6E) above: "Establish protected corridors along streams, rivers, lakes, and wetlands. Restrict timber harvest, road construction, grazing, and cutting of fuelwood within these corridors." I would point out that in the early 1990's while doing a series of aerial photography focused on forest management, I photographed the headwaters of Asotin Creek in the fall when the Western Larch had changed color to their beautiful golden yellow. At that point in the year, one portion of Asotin Creek could even be seen carrying a significant amount of water in one of its branches, such that it could clearly reflect the sun in my image. The steep slopes above multiple headwaters branches of Asotin creek had just been clearcut literally to the edge of the creek. The

cumulative impacts shown in this image are clearly excessive. The impacts of this severe treatment were likely serious for the T & E species dependent on the integrity of Asotin Creek's waters.

Please note, I hope to attach a digital file of the above important image to this input for your planning process. I would hope your future planning would clearly preclude the kind of treatment of our forest and water resources that is documented in this image.

Thank you for your careful attention to these comments, especially as you appropriately and carefully continue the protections that have been in place because of these forest's Roadless Area Protection Rule. Please note the needs for careful analysis and modeling that I have described in the various areas discussed in my numbered list above.

With best wishes for a process that minimizes future conflict,