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First name: Anon

Last name: Anon

Organization: Baker County Commissioner Witham, Baker Co Natural Res./Parks Bruland

Title:

Comments: October 2, 2025 Baker County appreciates the opportunity to comment on the Blue Mountains Forest Plan Revision. Comments on the Preliminary Need to Change, Proposed Action, and Scope of the Analysis: Need to Change See attachment for Table. In summary, the Preliminary Need to Change document is fairly concise and explains what was lacking in the 1990 Plans Preliminary Draft Proposed Malheur, Umatilla, and Walla-Walla National Forest Land Management Plans. Throughout the document, ease of reading is problematic. The public/commenters should not be required to 'learn' the abbreviations, otherwise known as the Plan Component Codes. "Desired conditions, objectives, standards, guidelines, and monitoring questions indicators have been given alphanumeric identifiers for ease in referencing within the land management plan. The identifiers include: [hellip]" The Codes make the Plan difficult to understand and adds a layer of cryptic nonsense that makes readers just give up trying to 'crack' the Code leading to not understanding the "conditions, objectives, standards, guidelines, and monitoring questions". Remove the Codes and spell it out! See attachment for table. The Baker County comment on the Scope of the Analysis is that it was a remarkable waste of FS employee time. At some point, a cutoff must be made as to whether a species is warranted to be reviewed or not. Using Nevada Needlegrass as an example, it is incomprehensible why it is still going to be listed after not being observed for 117 years. How far back in history does the Forest Service go in order to put a species on the 'concerned' list? Listings allow for projects that would help to improve forest health off the table due to environmentalist actions. Please, put a reasonable amount of historic sighting time into making determinations, such as 50-years. Otherwise, you are just giving fodder to those that would stop any forest work. The SCC list should align with Oregon and Washington state's Department of Fish and Wildlife list of SCC and not include any beyond that. The number of pages, nearly 10,000, makes the readability and time it takes to review the Analysis difficult. Baker County appreciates the opportunity to comment on the Preliminary Need to Change, Proposed Action, and Scope of the Analysis documents. The County looks forward to working in coordination and cooperation with the Forest Service as the NEPA process progresses. Sincerely, Christina Witham Baker County Commissioner Doni Bruland Baker Co Natural Res./Parks

Need to Change

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3 [ldquo][hellip]ecosystem services[rdquo] Define in the statement. This document is for general public review, not just those that understand natural resource jargon. For example: ecosystem services are outputs, conditions, or processes of natural systems that directly or indirectly benefit humans or enhance social welfare.

3 [ldquo], diseases, climate change, [ldquo] Remove the words [ldquo]climate change[rdquo] as it is speculative.

4 [ldquo]The revised plans need to provide flexible management direction that promotes innovative, new, science-based approaches.[rdquo] Agreed. Adaptive management responses must also allow management directions to change quickly and not get bogged down in regulations. Actions are much more important than words.

5 [ldquo]Timber products provided many benefits to local economies, however, large-tree reductions to below historical levels negatively impacted wildlife dependent on large-tree habitat.[rdquo] Where[rsquo]s the study that proves this statement? Without proof, this is just a supposition. Historic levels can easily be inflated or even refer to wildlife that never used the area. This appears to be the forest service defending a reason that the 21-inch Rule should stay in place to meet the environmental groups[rsquo] agenda.

5 [ldquo][hellip]land management plans must provide plan components for ecological integrity while contributing to social and economic sustainability[hellip]consistent with the inherent capability of the plan area.[rdquo] Agreed. This also means that outside groups should NEVER be able to override project needs that would benefit the local community.

5 [ldquo]Address a Changing Climate[rdquo] Remove this entire paragraph. Climate change is speculative and should not be noted in this document. Fraud has occurred in promoting climate change.

5[Idquo][hellip]noted exclusion of fire, timber harvest, and changes in human use during the 20th century created uncharacteristic forest composition, structures, densities, and spatial patterns. These conditions are out of balance and more susceptible to uncharacteristic wildfire and insect and disease epidemics.[rdquo] Not entirely true. Up until the 1990[rsquo]s, when forest management gave way to activism, logging, firewood gathering, grazing, and recreation kept the forest cleaned up and resistant to large wildfires. However, the end result is as stated along with the devastation of local economies. Again, remove [Idquo]a warming climate[hellip][rdquo] and take responsibility for the lack of management that is the root cause instead of blaming it on the speculative, political nonsense that is referred to as climate change.

6[Idquo]Land management plan components and management strategies need to be revised to move uncharacteristic conditions toward desired ranges of vegetation, fuel loads, and habitats which will promote resilient ecosystems and reduce risks to people and capital improvements.[rdquo]Define [Idquo]uncharacteristic conditions[rdquo]. It is used frequently throughout the documents but seems to have various meanings. Is this the terminology that is being put forth in lieu of [lsquo]climate change[rsquo]? If so, remove it. Describe an [Idquo]uncharacteristic condition[rdquo].

In summary, the Preliminary Need to Change document is fairly concise and explains what was lacking in the 1990 plans.

Preliminary Draft Proposed Malheur, Umatilla, and Wallowa-Whitman National Forest Land Management Plans

Throughout the document, ease of reading is problematic. The public/commenters should not be required to [lsquo]learn[rsquo] the abbreviations, otherwise known as the Plan Component Codes.

[Idquo]Desired conditions, objectives, standards, guidelines, and monitoring questions indicators have been given alphanumeric identifiers for ease in referencing within the land management plan. The identifiers include:[hellip][rdquo] The Codes make the Plan difficult to understand and adds a layer of cryptic nonsense that makes readers just give up trying to [lsquo]crack[rsquo] the Code leading to not understanding the [Idquo]conditions, objectives, standards, guidelines, and monitoring questions[rdquo].

Remove the Codes and spell it out!

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9[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]What is a National Forest travel plan and how does it fit into this Planning effort? If it[rsquo]s not a part of this planning effort, then remove the statement from the document.

12[Idquo]Objectives should be based on reasonably foreseeable budgets.[rdquo]Objectives must be based on what actions are necessary to meet the desired conditions. They should not be based on budgets.

15[Idquo]ecosystem services[rdquo]Add to Glossary. ecosystem services: outputs, conditions, or processes of natural systems that directly or indirectly benefit humans or enhance social welfare. Ecosystem services can benefit people in many ways, either directly or as inputs into the production of other goods and services.

16[Idquo]Healthy forests, shrublands, and grasslands provide clean water and air, along with the habitat for fish and wildlife across the Blue Mountains that are important to American Indian Tribes.[rdquo]Remove this statement as it applies to ALL people, not just American Indian Tribes.

16[Idquo]Managing vegetation is crucial to maintaining healthy forest that can withstand changes in temperature and precipitation patterns.[rdquo] This is an ill-disguised reference to [Idquo]climate change[rdquo]. Remove it.

16 [Idquo][hellip]permits to graze cattle[hellip][rdquo]Change to [Idquo]graze livestock[rdquo] as there are sheep ranchers that also graze on public lands.

16[Idquo]Residents and visitors alike seek out the national forest year-round for recreational opportunities.[rdquo]Full stop. Keep it concise and remove unneeded words. There is no reason to list out [Idquo]recreational opportunities[rdquo]. This is a forest management plan, not a travel guide. This applies to the entirety of the [Idquo]Social and Economic Characteristics[rdquo] section.

18[Idquo]This area also provides an important corridor for many of these species between the Rocky Mountains and central Oregon.[rdquo]Name a single species that uses this wildlife corridor between those points through migration. Wildlife corridors are an excuse to limit forest management using emotional ideology that makes people feel like they[rsquo]re doing something positive to help wildlife. Remove this reference.

19[Idquo][hellip]adaptive management framework[rdquo]The County fully supports adaptive management.

20[Idquo]Amend the plan so that the project or activity will be consistent with the plan as amended.[rdquo]Will the amendment process be open to public comment? The County cannot support the plan being amended just through an administrative action without involving the local government as well as the public. This is how we get many, sometimes conflicting, amendments within forest plans. Remove option.

25[Idquo][hellip]sustained steeper slopes.[rdquo]Too subjective. Define with a numeric value. Ex. Slope of X%

28[Idquo]Prioritize treatment areas identified by communities.[rdquo]The County fully supports this. No one knows an area better than those who live there. Public involvement is a must for successful forest management.

31[Idquo][hellip]cannot prevent invasive species from dominating the landscape, nonnative plants may be used in treatment.[rdquo]The County fully supports this. In past comments, for years, we have promoted the use of non-native species as they usually grow more rapidly than native species. For example, double seeding headwalls with winter wheat and adding native and nonnative varieties to the mix gives an excellent outcome. The wheat comes up and provides micro-climates for the other seeds and provides forage for wildlife.

34[Idquo][hellip]coordinate with[hellip][rdquo]Add Counties to the list of entities you must coordinate with during the TMDL implementation plan process.

35 [Idquo]Public use infrastructure and National Forest System lands is designated to enable the daily activities, seasonal movements, dispersal, and potential range shifts of native species through habitat connectivity.[rdquo]Baker County has a no net loss of roads policy. [Idquo]Specifically, there will be no net loss to access.[rdquo] (BCNP 2016, pg 18) Access is critical and necessary not only to maintain the mandate of multiple use, but also for emergency entry for fire control and human rescue. Baker County does not support habitat modifications based on single species, preferring a healthy ecosystem that provides habitats for diversity of species. Baker County believes that the Forest Service is using the excuse of [Idquo]habitat connectivity[rdquo] to close more roads and reduce access to public lands. The County encourages the Forest Service to use timetested, science-based methods for diverse wildlife habitat. The complex concept of habitat connectivity is not going to be solved by simply closing roads. In fact, while roads may, or may not, affect elk movement as significantly as some studies suggest, other studies have shown that quality forage and cover are just as much, or even more, important.

36[Idquo][rdquo][hellip]connected areas should be retained for species dependent on structurally complex forest.[rdquo]No! This is just an excuse to reduce the size of fuels reduction projects. Wildlife have evolved through times of changing forestland and have continued to thrive. They will find a way through a harvested area. Remove all references to connectivity.

37[Idquo]Wallowa-Whitman NF: 88,000/decadeThe amount of treatment must increase substantially. This will not catch up or keep up with forest growth.

46-48 Old Forest and Individual Old Large Trees Minimize [old growth forests] as they have maxxed out their carbon sequestering potential and too many reduce the number of younger, healthy trees for density issues.

The County supports the [Management Approach] (pg 48) as it addresses the above issues.

52 [The identification and protection] Add [of] after [protection] on last line of pg.

53 [Reduce juniper canopy cover to less than 10 percent in sagebrush steppe habitat, mahogany, meadows, springs, seeps, or riparian areas.] Willowa-Whitman NF = No objective This is unacceptable! Junipers consume 3050 gallons of water per day contributing to drought stress and have the added detriment of being allopathic, killing all other vegetation around them. They are, and should be considered, an invasive species and treated as such. Recommend prioritizing juniper removal on south-facing aspects, especially in meadow and riparian areas. Remove 1,000 ac/year

53 [Utilization of livestock (normally sheep, goats, or cattle) are appropriate tools for targeted grazing for vegetation management, such as fuels reduction or invasive plant control.] Yes! The County fully supports the use of livestock in fuels reduction. The number of AUMs must be increased to better help with vegetation management. It has significantly decreased since the 1990s and needs to be reinstated at those levels.

56 [coordination with the wildlife biologist.] Is that state or federal?

57 [To preserve] areas with high concentrations of metal ores, [Remove] Mining is a land use right as per the 1872 Mining Rules. In addition, the current federal administration is securing America's mineral independence and mining must be a priority to address that.

59 [06. Whitebark pine] under future temperature and precipitation patterns, [The climate system is a coupled non-linear chaotic system, and therefore the long-term prediction of future climate states is not possible.] (IPCC 2001) Remove statement.

59 [Forest wide to specific ecological niche depending on the species habitat characteristics involved.] Healthy forests provide habitat, connectivity, clean water, etc. without having to create manmade areas. The statement, as written, would eliminate all fuels reduction or forest health projects due to the number of, sometimes conflicting, desired conditions.

6004. [To reduce disturbance to denning wolves,] should implement appropriate site-specific restrictions. Wolves are not an Endangered or Threatened species in Eastern Oregon. Remove this statement.

61 [Wolves] Section Remove the entire section.

See above statement. In addition, Livestock carcasses cannot be removed from NF land. They are most likely not able to be found and are no different than a dead elk or deer to the scavengers that rely on them. This is an absurd statement. Per ODA compensation for depredations, no requirement exists to remove carcasses from the landscape. In turn, there is no compensation for livestock owners if carcasses are left on the livestock owners private land if depredations occur, as it is viewed as baiting.

62 Marten: [potential home range for marten] Projects should be based on improving forest health, not providing habitat for wildlife that may not be there. If the forest is healthy, then all wildlife will fare better, and expand ranges. It doesn't need to be a manmade [solution].

65 [and is addressed in a national forest's travel plan.] WWNF and MNF do not have a travel plan, either remove or state Umatilla Forest only.

6701. [cooperate routinely] Replace [cooperate] with [coordinate]

6902. [given future environmental conditions] Remove speculative language that refers to climate change

79Table 11Due to mandates from the President and the Regional Supervisor, shouldn't there be a substantial increase in MMCF and MMBF on the WWNF? The Table does not show this.

7903. [Idquo]Timber shall be harvested only where protection is provided for bodies of water, fish, wildlife, recreation, and aesthetic resources.[rdquo]Remove or Reword this statement. Harvest must happen to ensure the economic sustainability of local communities and to promote forest health, fuels reduction, and provide for rights of use such as grazing, mining, etc. A project should never be limited based on protections being available or not.

8005. [Idquo]Silvicultural treatments shall not be selected based solely on their ability to provide the greatest dollar return or output of timber.[rdquo]Dollar return and output have to be a huge part of the decision making process.

8006. [Idquo]Openings created by[hellip][rdquo]No [Idquo]clear cutting[rdquo] in WWNF! It takes too long for our forests to regenerate.

8007. [Idquo]Even-aged regeneration harvest[hellip][rdquo]See above statement regarding clear cuts.

81[Idquo]Livestock grazing is a historical use that still resonates with the western culture of the region.[rdquo]Remove or Reword. Livestock grazing is a historic use that is still used today to help sustain local economies. It is not a glamorized [lsquo]western culture[rsquo], it is a means of economic survival.

8207. [Idquo]Vacant and forage reserve allotments may be analyzed and authorized using[hellip][rdquo]Change [Idquo]may[rdquo] to [Idquo]will[rdquo] be analyzed. The number of AUMs have been drastically reduced since the 1990s and needs to rebound and increase to meet the needs of fuels reduction and economic stability.

83 [ndash] 84[Idquo]Guidelines[rdquo]Thank you for this section. Baker County supports the continuation and expansion of livestock grazing to help fuels reduction, while providing for sustainable forage and regeneration of vegetation.

8701. [Idquo][hellip]and looks for opportunities to acquire new permitted water rights to support multiple uses in the national forest.[rdquo]ABSOLUTELY NOT! State and federal agencies have no right to water that is needed for communities and local industries and are based on state of Oreogn water rights. Every time an agency gets water rights, they reduce the amount of water available or increase the number of regulations to access it. Baker County strongly disagrees with state and federal agencies holding water rights.

8702. [Idquo]Forest management seeks to make the most efficient use of existing water sources to benefit the public[hellip][rdquo]The FS must prioritize municipal watersheds to keep them wildfire resilient and not allow outside efforts to reduce projects[rsquo] effectiveness as they have with the Baker City Watershed. Municipal water is critical to communities and must be treated as such.

88[Idquo][hellip]or lands that have lost NationalForest character.[rdquo]It is a requisite of public lands to stay public. Who makes the decision that the land has lost its NF character? Lands evolve and so should their use.

92[Idquo][hellip]in a sustainable, resilient, and balance condition.[rdquo]This may be the Desire Conditions, but wilderness areas are not even close to being sustainable, resilient, and balanced. They contain forests that have a high density of trees, insect and diseased trees, invasive

species, so provide ample vegetation for catastrophic wildfire to begin in those areas and burn onto non-designated forestland.Wilderness areas will not move into the Desired Conditions state unless harvest, fuels reduction, and invasive species control occur.Cease the [lsquo]hands-off[rsquo] approach to Wilderness areas and manage them as a forestland.

92[Idquo][hellip]for prohibited uses, including use of motor vehicles, motorized equipment, and mechanical transport or installations shall be limited[hellip][rdquo]It is truly a travesty that 13%-16% of all Baker County residents cannot access 20% of WWNF due to disabilities. Due to mobility improvements folks that could access Wilderness Areas using a motorized mobility assist, could not because of the [Idquo]no motorized equipment or mechanical transport[rdquo] rule. This is not right and flies in the face of the Americans with Disabilities Act.

93[ldquo]Congress has not yet acted on the study[hellip][rdquo]Keeping Administratively Recommended Wilderness Areas and Wilderness Study Areas under the same protection as designated Wilderness Areas for long periods of time is asinine. Proposed and Study Areas should only be[lsquo]off-limits[rsquo] to forest management for up to (3) years. After that, those areas should revert back to managed forestland.

94[ldquo]allowed[rdquo] second sentence from the bottom[ldquo]allowed[rdquo] is duplicated. Remove one.

96Table 17As per Baker County[rsquo]s Natural Resources Plan, [ldquo]It is Baker County[rsquo]s Policy that no Special Designation be introduced in Baker County unless it is firmly endorsed by the local community[hellip]has been fully coordinated[hellip][rdquo] (pg 34) There has been no coordination or discussion of any kind between the Forest Service and Baker County. Therefore, any proposed Wild and Scenic Rivers must be removed from consideration.

98IRA[rsquo]s There should be a disclaimer that the roadless areas are not in effect due to USDA Secretary Rollins rescinding the roadless rule for the national forest. I see it noted in very small text on page 101 and 125 after the charts but it should be noted up front that this is pending.

110[ldquo][hellip]that result in larger widths.[rdquo]Does this also mean that lesser widths could also be considered?

11304. [ldquo]Authorization shall be designed to avoid livestock trampling of federally listed threatened or endangered fish redds.[rdquo]Please, share the studies that prove livestock step on fish in the streams. This is ridiculous. Remove this statement.

11412. [ldquo]To reduce grazing[hellip][rdquo]Word salad! Reword to make sense.

115 - 116[ldquo][hellip]10 to 15 cm (4 to 6 inches) along the greenline.[rdquo]Many kinds of vegetation, including those that grow in, and along riparian zones, never grow to 4-6[rdquo] tall, even without grazing. Use a percent of use rather than a number on a scale. Do Not use stubble height. The bullet points regarding vegetation, stubble height, use, etc. need to be cohesive and not contradictory as they are now.

116[ldquo]If progress isn[rsquo]t made toward long term desired conditions, and livestock grazing is the cause, adjust short term (annual) indicators.[rdquo]How is the cause going to be determined? Why have indicators if they[rsquo]re just going to be ignored or changed to fit the situation?

127 [ndash] 134Monitoring Section Baker County approves of adaptive management as needed through monitoring. Biennial reports will help to address any issues in a timely manner, however, it will be staff and financially consuming for the FS. Thank you for providing the opportunity for public comments into the biennial reports.

Appendix C: Preliminary SCC List & Species of Substantial Concern Rationale

1[ldquo][hellip]species determined to be native and known to occur in the planning area,[hellip][rdquo]The County supports that listed species have to be native and known to occur and not listed due to potential habitat. DO NOT use criterion such as [ldquo]potential[rdquo], [ldquo]may be[rdquo], [ldquo]possibly[rdquo], etc. Statements made regarding a SCC must be known.

1C. [ldquo]Oregon, Washington, and Idaho State listings of threatened and endangered species, sensitive species, species of concern, and conservation strategy species.[rdquo]For species listed by Oregon, a management plan must be in use to help direct actions. Without a management plan, it is difficult to justify any action, or non-action, on public land.

1E. [ldquo]Delisted (removed) from the Endangered Species Act list within the last five years, or delisted and still monitored by the authoritative regulatory agency.[rdquo]No! Once a species is delisted it must be removed from the SCC list without any caveats, such as [ldquo]still monitored[rdquo].

1H. [ldquo]Local conservation concern[hellip][rdquo]No. This opens the door to environmental activists to put

species on the list that may, or may not, be threatened or endangered. It is easy for community members to shout about loss of habitat, for example, without having a monitored or studied area that would determine the species's population.

1[Idquo]Substantial concern about the species's capability to persist[hellip][rdquo]Define [Idquo]long term[rdquo]. Historically, species have ebbed and flowed in their populations. Some, disappearing from the landscape permanently without anthropogenic interference. Recognize that all species evolve to current conditions or go extinct.

21. [Idquo]These threats include climate change.[rdquo]Remove this as a criterion. Of course, climate changes! Thank goodness we aren't still in the ice age! Wildlife and humans adapt and evolve.

22. [Idquo]Declining trends in populations or habitat in the plan area.[rdquo]This criterion must also provide a valid, documentable, studied, reason(s) for the decline.

Example: Nevada Needlegrass (*Achnatherum nevadense*)

4[Idquo]Information on the effects of fire for this species is limited.[rdquo]If there is little known about a species's response to a stressor, then don't list it.

4[Idquo][hellip]others report[hellip][rdquo]Who? Listings cannot occur without a name of the person or entity that is stating a concern regarding a species. Someone must take the responsibility of the listing.

5[Idquo][hellip]only one known occurrence[hellip][rdquo]Then no statement can be made that it is vulnerable to local extinction from stochastic events. Has the occurrence been observed since its discovery? Why not?

5[Idquo]Yes, there are significant threats to this species.[rdquo]How do you know this if there's only been one sighting?

5[Idquo]Insufficient scientific information to determine that habitat of this species is declining.[rdquo]So why list it if there is no scientific evidence to determine the habitat is declining?

5[Idquo]It is ranked as apparently secure globally and imperiled in Oregon.[rdquo]Maybe it is not supposed to live in Oregon.

6[Idquo]There is no other scientific information available that is pertinent to the determination of substantial concern for long-term persistence of Nevada needle grass in the plan area.[rdquo]Do not list it. You do not have enough information to make a valid determination.

7Rationale StatementThis is completely disingenuous and the reason that the public cannot trust agencies with listing determinations. There is no legitimate, scientific reason that this plant must be listed.

20Table 4The last observed specimen was collected in 1908. In the 117 years since that collection, why hasn't it been observed again? This leads to the conclusion that it is extirpated in the area and does not warrant listing.

The Baker County comment on the Scope of the Analysis is that it was a remarkable waste of FS employee time. At some point, a cutoff must be made as to whether a species is warranted to be reviewed or not. Using Nevada Needlegrass as an example, it is incomprehensible why it is still going to be listed after not being observed for 117 years. How far back in history does the Forest Service go in order to put a species on the [Isquo]concerned[rsquo] list?

Listings allow for projects that would help to improve forest health off the table due to environmentalist actions. Please, put a reasonable amount of historic sighting time into making determinations, such as 50-years. Otherwise, you are just giving fodder to those that would stop any forest work.

The SCC list should align with Oregon and Washington state's Department of Fish and Wildlife list of SCC and not include any beyond that.

The number of pages, nearly 10,000, makes the readability and time it takes to review the Analysis difficult.

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