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Comments: September 18, 2025U:S. Department of Agriculture, USDA Forest Service2025 Preliminary Draft Proposed land Management Plan for Malheur, Umatilla and Wallowa-WhitmanNational ForestsForest Supervisors Office, 236 ppRe: Comments on the Preliminary Draft Proposed land Management Plan for Malheur, Umatillaand Wallowa-Whitman National Forests (Draft Plan) as pertaining to RecreationDear Sir:Enclosed are my comments on the Preliminary Draft Proposed Land Management Plan for Malheur, Umatilla and Wallowa-Whitman National Forests (Draft Plan) as they concernRecreation.I am very interested in what the Forest Service is planning for the transportation system andrecreation. I also tried to read other sections, but found the document very difficult to read andto understand. This Draft Plan clearly does not comply with the Plain Writing Act of 2010. The Plain Writing Act of 2010 requires all government documents to be clear and readable by thegeneral public. This means writing in a clear, concise, and well-organized manner, makinginformation easily understandable and usable by the public. The Draft Plan fails to meet theintent of this law. I kept seeing hundreds of abbreviations, like FW-ERCDIS-DC and MA2B-RNA-DC and it goes onand on. I did try to read the part on page 64, under desired conditions for Local Communities, but all I could see was things like I should refer to FW-WTR-DC, FW-AQ-DC, FW-TRI-DC, FW-REC, and MAIA-DWA DCs. These Plan Component Codes, or abbreviations, which continuethroughout the document, may mean something to the Bureaucrats, but they are distracting, and mean nothing to the ordinary reader. When these abbreviations mean something that is important to the document, each should bewritten out in English. In addition, the reader should not have to thumb through the documentto find out the meaning of each of these abbreviations. Furthermore, the document mentions the appendixes and how the reader needs to refer to these. If there is something important to he subject being discussed that information should be presented and be written in plainEnglish. The Draft Plan states the reason the Forest Service needs a Revised Forest Plan is because the Forest has changed a lot. It states" Since the current 1990 Plans were implemented more than 30 years ago, there have been: new laws, regulations and policies changes in population, publicvalues, and community needs bigger and more devastating fires new invasives and outbreaksthat the previous plans did not anticipate, such as the mountain pine beetles epidemic changesand increases in activities and uses advances in science and information that need to beincorporated into the revised Land Management Plan. Besides the fact that this is a hard to read, is a run-on sentence, and is in need of punctuation, italso is not factual. Really, not so much has changed in Baker and Grant Counties. There are no new laws affectingthe Forest Service, except for the rule that global warming and the effects of greenhouse gassesis no longer an issue and must be deleted from land use plans, and there also may no longer beroadless inventoried in Land Use Plans. There really are no changes in population numbers. Timber and mill workers retired and stilllive in Baker County, while their kids moved away to areas where they could find jobs. Publicvalues and community needs are still the same. The Draft Plan states a new Plan is neededbecause the 1990 Plan did not anticipate catastrophic fires, but that is not the fault of the Plan, it is the fault of the Forest Service for not logging and thinning as the 1990 Plan advised they do. Yes, the population is getting older, and many of us enjoy the Forest via ATVs. The 1990 ForestPlan was user friendly, and unless resource damage was taking place, roads and trails were tobe left open, improved or moved if there was a better location. That 1990 Pian states, "TheForest offers a wide range of outdoor recreation opportunities varying from primitive hiking andhorseback riding experiences within wilderness and the Hells Canyon National Recreation Areato the relatively developed atmosphere found at Anthony Lakes. Phillips Lake and a [middot]number of other recreation sites Although recreation is concentrated in the late spring, summer and fallwhen most of the Forest is accessible by wheeled vehicle~ opportunities for winter recreation areabundant for those interested in downhill or crosscountry skiing, snowshoeing orsnowmobiling"It is interesting to note, that the 1990 Forest Plan gave guidance through 2030. The 1990 Planstated "The Forest has a general surplus of supply over existing and projected recreationdemand. It will maintain the surplus through 2030 though changes will occur in recreation use". Today, as the 1990 Plan foresaw, there still are a surplus of roads and trails. This is a good thing, and this situation should be maintained. Use of the roads and trails continues to be the same aswe saw in 1990, with the change

that more AYVs and side by sides are using the roads and trails. The 1990 Forest Plan under TRANSPORTATION SYSTEM stated the Goal (same as DesiredCondition in the Draft Plan) was "To provide safe, efficient environmentally sound access for themovement of people and materials involved in the use and management of the National Forestlands". This is short and easy to understand. In contrast, the Draft Plan states the following: 01. 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 treatyrelated activities. The transportation system and its use support ecological, social, and economicsustainability. Transportation infrastructure and Its use are managed to avoid or mitigateundesired effects to ecological integrity and diversity and on resources including threatenedand endangered species, species of conservation concern, heritage and cultural sites, water sheds, water quality and aquatic species.I looked up "ecological integrity," since I had no idea what the Draft Plan was talking about, andfound out the following; "It essentially means an ecosystem is whole, unimpaired, and able tofunction naturally". So I am asking, does this mean that the mitigation would be to have noroads? If this is what the Draft Plan means, it should be written out in plain English. This section goes on and on. It talks about "reasonable access1' but what is reasonable to the Forest Service may not be reasonable to the public (i.e the public should walk instead of usingan ATV or pick-up). A definition of "reasonable access" is needed. So much information just to describe the goal for the transportation program. And even with allthis verbiage, 02 neglected to include mining in how the Forest Service plans to provide reasonable access. Under the Transportation section on page 65, the Draft Plan refers to the national forest's Transportation Atlas. Please provide me a copy of that Atlas. On page 66, again I see that the Draft Plan advises that all existing roads and trails that cross"sensitive areas or affect ecological (natural process areas) or cultural resources may requireadditional mitigation." Is one of those mitigations to close the road? If so, the Draft Plan shouldcome right out and say this in plain English. The Recreation section on page 67 lost me right off with RECDEV. RECDID sand DECBCA. I didtake the time to look up Appendix E, which is about Recreation Opportunity areas, but it toowas confusing, and I could not tell what it means for the future of roads and trails. I was told that the Draft Plan proposed increasing the buffer along dry stream from 50 feet to 150 feet. I found this on page 111, but there is no mention of this change in the Recreationsection and how this change would affect existing roads and trails. The current SO-foot buffersdo not even have riparian vegetation, so increasing the width to 150 feet makes absolutely nosense if protection of a sensitive area is the goal. There is no environmental reason to increasethese buffers by an additional 100 feet and preclude any activity within this additional 100 feet. Also, whatever in the world "a distance equal to the height of two site potential trees" is, this isnot clear and is completely confusing. And adding new Research Natural Areas is not needed. These are "designated in perpetuity" according to page 101, and once designated, they willnever go away. The 1990 Land Use Plan is clear and concise and easy to read and understand. I suggest the Draft Plan include some of the Standards and Guidelines from the 1990 Forest Plan.1) Plan and develop the transportation system to serve long-term multiple resourceneeds rather than short-term individual project proposals.2) Design, construct, operate and maintain roads and trails of the Forest transportationsystem based on resource objectives and intended uses, considering safety, total cost oftransportation, and impacts on the land.3) Manage road and trail uses to protect resources, accommodate or restrict conflictinguses, provide reasonable safety, and prevent damage to the facilities.4) Encourage access to historical dispersed recreation sites by standard vehicles.5) Manage traffic as needed due to structural limitations of the road or limitationsimposed by other resources, such as wildlife or recreation.6) Construct and maintain trails to provide a recreation experience as well as atransportation route.7) Provide trails to meet specific management objectives and to achieve prescribeddifficulty levels.S) Emphasize trail retention, maintenance, and improvement (and additions where thereis a valid need).9) Evaluate the need for trails and perpetuate, or move to a new location, those trails which will serve a continuing purpose and which appear likely to be used. The Draft Plan must be withdrawn and rewritten so it is in compliance with the Plain Writing Actof 2010. When I can better understand what the Draft Plan is saying, I will be able to makeadditional comments. Sincerely, Jan Alexander Concerned Citizen and National Forest User