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Comments: The comments below constitute my input to the Draft Blue Mountains Forest Plan. My comments onlyaddress the Malheur National forest and that part of the Ochoco National Forest that the Malheur NFadministers, the former Snow Mountain Ranger District.Wildland Fire30,000 of acres of fuels treatment annually is not adequate to return fire to it's natural role in the forestecosystem. The Forest has hundreds of thousands that are over stocked and over dense canopies. Farout of line with historical stand densities. In the early 20th century, the first rangers on the SnowMountain Ranger district could drive nearly every where with out roads. The only big obstacle beingSilver Creek which dissects the district. The reason was historical "natural" low severity fire returnintervals had kept dog hair stands to trees from establishing resulting in stands of large tall trees overmost the area with smaller pockets of denser stands. Generally speaking there was more herbaceousvegetation woody shrubs. Today, much of the forest is classed as severe wildfire risk due tooverstocked stands. Fire return intervals in the southern blues were historically were 12 to 25 yearsdepending on elevation, aspect, and plant community. If one uses an average of 20 year interval overthe whole of the roughly 1. 7 million acre Forest, the Malheur should be accomplishing in the vicinityof 85,000 acres annually of planned and unplanned fire treatment. Treatment areas should be largeenough to provide shaded fuel breaks for unplanned ignitions. Given warmer and drier climatic trends,even this acreage accomplishment may prove conservative. Shaded fuel breaks should be strategicallyimplemented along roads and broad flat benches like Howard ridge, Nicholl ridge, the west side ofSilver Creek, Elliot ridge and others.Soil I can't believe you would settle for 20% of activity areas in degraded soil condition. You may havealready achieved that on low elevation forested ground at the southern end of the forest. Historiclogging during late fall and early spring during high soil moisture had resulted in much of the area in anunacceptable high soil compaction. This is causing low vegetation productivity, decreased infiltration,and increased and flashy run off. This all places additional stress on already degraded riparian area.Do some soil condition surveys. Decrease your degradation threshold to something more like 5%,which of course would include skid trails, landings, roads and trails, dispersed camp areas.Invasive SpeciesI agree that eradication is not a viable objective. I don't agree that 3,000 acres is an aggressive enough objective. Aim high! Reduce your acreage from 3,000 to 1,000 acres.You've also got a good start on standards. You forgot one important forest user group, grazing permitholders and those that help them with range improvement maintenance and livestock distribution.Many permittees have state and county listed A, B, and C weeds on land they own or control. Thevehicles and equipment permittees use for forest activities should also be certified weed free beforeentering the forest IF they have listed species on their home properties or those other properties that areused in association with their permits. Livestock should be pastured, handled, or trailed in weed freeareas prior to entering the national forest. This should include horses used for forest activities as theirdigestive systems are not efficient and digesting and destroying weed propagules. Perhaps if permittedlivestock could be held or pastured on certified weed free areas at least 3 days prior to entering theForest, some of these prevention measures could be waived.Forest DensityIf I were only able to pick one condition contributing to degradation of the Malheur forest, it wouldexcessive tree stocking levels. Plant and animal species diversity, watershed health and function,forage production, wildlife habitat, carbon cycling, you name it, it is negatively affected by too manylarge areas of over stocked stands of conifers. Changing climate to warmer and drier necessitates youchange (lower) densities. Your desired conditions for moist and dry upland forest stand densities aremuch too high. Drop the high stand density numbers by half and distribute the reduced percentagesinto low and moderate stand density. In the last forest plan many areas like wildlife corridors, winterrange, riparian corridors or influence zones had become essentially no go zones for forest treatments.These areas need to be treated! These no go zones have become wildfire corridors rather than wildlifecorridors. They need to be treated.Tree species composition and structureOf course climate, fire return intervals tree density, historical stand management, and other things affectcomposition and structure. As you accomplish your lower stand density goals your shade intolerantspecies compositions will rise. True firs are invading mixed conifer stands and mixed conifer isincreasing in dry pine sites. Adjust your mix of shade tolerant

species to the downside and shadeintolerant to the upside.Forest Vegetation (general)Your plan calls for 130,000 acres of mechanical treatments. There are roughly 1.7 million acres on theforest. The composition, structure, and canopy of the forest is extremely out of balance. 130,000 acresis not going to get the forest far along the path to health. You should be treating a minimum of 25,000acres every year until you have achieved a healthy functioning forest which is close to historic rangesof forest vegetation.Snags and downed woodOut 5 or 6 decades when forest managers have returned to stand structure and composition consistentwith historical fire regimes, the guidelines for pieces of down wood will be appropriate. Until thenstand treatments and increased fire return to the system will make achieving your down woodguidelines impractical in dry and moist forest. Please lower them accordingly.Aspen, Woodland, Shubland, Grassland, Meadow, and other forested habitatsAspen. According to a study done by the Blue Mtns Forest Partners in 2017, aspen occupy only 20 to50% of their former range on the Malheur NF. So let's say then that the forest had 5% of its vegetationin aspen and deciduous hardwoods. Your proposed 200 acres of aspen restoration is woefullyinadequate. You need to increase your annual target for aspen restoration to between 1,000 and 1,700acres per year.Juniper. I don't think you have considered how much juniper has invaded areas outside of sagebrushhabitat. There has been a lot of juniper invasion along the edges of meadows, incised and water tablelowered riparian areas, and low elevation pine forests. Junipers do not belong in these areas at all.These areas need to be treated to eradicate the juniper invasion in these non juniper habitats. Pleaseaddress juniper removal in these plant communities.Rangeland Forage and Livestock Grazing You state that you are going to use vacant and 'reserve' allotments to help with grazing issues. You donot state who will be be responsible for and incur the cost for maintaining range structuraldevelopments in these allotments when not in use. Please address this issue.You state you will allow 40% use on shrubs. That's probably an appropriate figure. Are you aware ofthe time, effort, level of expertise, and expense involved with sampling ungrazed and grazed shrubs in sstatistical sound manner? Please explain exactly how you will ensure timely and accurate monitoringof shrub use will occur. Transportation Maintenance of 400 to 600 miles of road is not realistic. Let me stipulate I don't know how many milesof which category of roads are on the forest. I realize you don't have to maintain every mile of everyroad every year. Having said that, I do know at one time the Ochoco portion of your analysis area hadroughly 1 mile of road per square mile of forest. The Ochoco portion was roughly 240,000 ares or 375square miles. You can extrapolate something along those lines to the rest of the Malheur acreage sanswilderness and roadless areas. You will find that your 400 to 600 miles of maintenance is not going tokeep the road system in a safe condition or condition which does not contribute to degradation of thesoil, watershed, aquatic, and riparian resources. Please explain then. Are you going to close roads? Ifso how many and where? What will be the effects on resources and the community?James Campbell