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Comments: I appreciate the opportunity to comment on the draft Need to Change for the Blue Mountains Forest Plan Revision. I agree that the needs identified in the document are accurate and that the USFS plans to make modifications in that align forest planning and projects with the best available science. I especially encourage and appreciate adopting scientific standards that address the importance of maintaining old growth forests and ensuring future timber sales do not interfere with forests that are reaching a mature stage and/or provide critical habitat for wildlife.

The Need to Change draft is light on details and omits mention of the importance of rebuilding wildlife connectivity areas, protecting and increasing areas that are permanently off limits to commercial timber harvests, and restoring and removing roads large areas of the three national forests that still have extensive road networks from past logging activities. The current state of the three national forests and a history of expansive extractive activities for both timber and subsurface minerals continues to have a negative impact to wildlife. Existing forest plans and currently proposed commercial logging projects in all three national forests regularly and consistently underemphasize the extent that these public lands can contribute to stated climate mitigation and biodiversity protection goals. This is increasingly the case as climate change impacts extensive intact whitebark pine habitat, and the Blue Mountains are home to numerous endemic and endangered plants, animal, insect and aquatic species.

I will conclude with a final note on the perceived need to couple landscape restoration and an attempt to do forest restoration to reduce the size of fires with projects that also include sizable commercial timber harvests. As the draft Need for Change states, the conditions that led to larger fires include a history of timber harvests, and these large harvests continue under the existing forest plan. These projects rarely are located near communities, and by telling residents living in northeast Oregon that these management activities will reduce wildfire risks, it provides homeowners in the wildland urban interface with a false sense of security. The USFS should be working with state agencies to promote (and, where feasible, financially support) home hardening and helping to create more Firewise Communities, the two strategies that have shown consistent positive outcomes. Across the Blue Mountains, and in the Western US, we are returning to a more regular fire return interval and fire suppression activities are no longer as effective as they were in prior decades. Forest Management activities on national forests cannot feasibly happen on a sufficiently large scale to reduce the likelihood of a forest fire, and this is especially not the case if a project includes a commercial harvest. As a small private forest manager who has worked on fire reduction and restoration for the past 25 years, for fire mitigation to be successful it requires revisiting each project area on a 3-5 year basis to ensure restoration activities are maintained. This proved true this summer as the Monkey Creek Fire burned through our community. So I appeal to the next forest plan and the USFS to be honest when proposing a commercial harvest project. When these projects are proposed and approved under the new Blue Mountains Forest Plan, it would benefit the public to clearly state that the primary goal of these projects is for commercial harvests and protecting resource extraction dependent jobs and stop the current practice of claiming that these projects are being done for restoration or fire mitigation purposes.

Thank you again for the opportunity to provide comments on the draft Need for Change to the Blue Mountains Forest Plan Revision. I look forward to a future Blue Mountains Forest Plan that rightfully and truly balances the needs to restore ecological function and mitigate climate change alongside a reduced focus on extraction activities and restoration of lands impacted by a long history of degradation.