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Comments: Comments on Draft Preliminary Blue Mountains Forest Plan Revision #64157

The three National forests, Wallowa-Whitman, Umatilla, and Malheur, each need to have their own forest plans separately developed under NEPA rather than being lumped together as a combined NEPA project. Each of the forest plan areas have considerably different climatic, geological, geographic, soil characteristics, and contain different flora and fauna. The social-economic needs of the areas are completely different. These differences are not adequately addressed in a combined NEPA document. The 2012 planning rule directs the responsible official to coordinate land management planning with other planning efforts. Even though the end planning result may not match perfectly with each counties' separate land management plans, greater effort needs to be applied to the individual needs and goals of the several counties which contain the three forests. Three separate plans should reflect the expected distinctive roles and contributions to the local areas and communities. Please treat the three forest plans as three completely separate distinct documents.

Many people have expressed that they want less wilderness not more. Any proposals to take more forest out of production and recommend areas for wilderness inclusion, need to be carefully evaluated for mineral potential by actual geological surveys. Areas already in wilderness need to be evaluated for whether they are suitable to continue being in the wilderness system. Many millions of acres of mineralized lands have been placed into a wilderness category without proper geological examination. The law creating the National Forests provides that "any mineral lands in any forest reservation which have been or which may be shown to be such, and subject to entry under the existing mining laws of the United States and the rules and regulations applying thereto, shall continue to be subject to such location and entry", notwithstanding the reservation. Use of the forest resources by the people was a major part of the original purpose of the law that allowed the three National Forests to be reserved. Please pay more attention to multiple uses and recognition of the requirements of the law.

The assessment needs regarding climate change have all concentrated efforts toward analyzing the effects of a warming climate, however, recent science indicates the climate may actually be cooling. If the plan assessment really needs to analyze changing climate, monitoring the effects of both cooling and warming of climate should be addressed. Each of the forest plan areas has different geographic elevations, soil characteristics, and flora and fauna. and baseline climate are vastly different. They will obviously be affected differently with any climate change whether it is warming or cooling. This further emphasizes the need to separate the three forest plans.

Progress toward meeting the desired conditions and objectives in the plans, including providing for multiple use opportunities, will be much better served if these vast planning areas are considered and analyzed as three separate plans.