

Data Submitted (UTC 11): 10/4/2025 6:40:08 PM

First name: Ken

Last name: Alexander

Organization: Eastern Oregon Mining Association

Title: President

Comments: The proposed Blue Mountain National Forest Land Management Plan (BMNFLMP) will affect about 5 million acres of National Forest lands, in three separate National Forests. The FS has proposed to consolidate the future desired objectives and conditions on vast areas that have a huge range of different characteristics and needs. "The Land management plan components including, desired conditions, standards, guidelines, and objectives are generally the same for each of the national forests." This statement is untrue in regards to the people who use, and live near, the three completely different forest areas. The three forests have huge differences in wildlife, habitats, vegetation, geologies, economies, and social needs. For example, the Wallowa Whitman National Forest contains many significant and valuable mineral deposits, and over a thousand active mining claims, while the Umatilla and Malheur National Forests contains very few active mining claims. The combined BMNFLMP fails to properly analyze and consider the different needs that represent the historical uses that have developed in the different areas over the last hundred plus years of use. The need for emphasis on planning for reasonable development of mineral deposits has been almost entirely ignored in favor of preservation and protection in this general analysis.

Comment #1: The three separate National Forests have entirely different desired conditions and objectives depending on whether their main historical use corresponds to logging, grazing, mining or recreation or other uses. This plan analyzes a compromised mixture of objectives and desired conditions that fails to meet the need for individually analyzed and developed plans for each Forest. Putting all of the information into one document makes the document difficult for the public to understand. This not only does not meet the Plain Writing Act but also complicates and hinders the efficient administration of the forests by the Forest Service.

The current draft has emphasis on needless general setbacks and protection of habitat and not enough allowance for practical positive multiple uses of the forests. It is not realistic to expect that the "suitability of lands" can be accurately and comprehensively determined on the vast area of three separate forests. "If certain lands are identified as not suitable for a use, then that use or activity may not be authorized." This type of directive does not allow administrators to change plans to meet local challenges. For example, "Every plan must identify those lands that are not suitable for timber production." This is contradictory to the idea that plan decisions will be made on a local basis and adjusted for local conditions that will change with time. Furthermore, the 2012 rule emphasizes stopping activities even if they are not prohibited by the general plan.

"Plan components for a management area may differ from forest-wide guidance by:

- * Constraining an activity where forest-wide direction does not.
- * Constraining an activity to a greater degree than forest-wide direction.
- * Providing for an exception to forest-wide direction, when forest-wide direction would otherwise conflict with the management emphasis of the management area."

There are several areas that the BMNFLMP imposes idealistic and unrealistic goals and objectives that are directly in conflict with the requirements of many uses of the forests including extraction of mineral deposits. For example, "the need for soil productivity to sustain the productive capability of the land, its ecological resources, and watershed functions." There often is a necessary and unavoidable loss of some "soil productivity" from mineral extraction.

Comment #2: The planning document needs to be revised to represent and guarantee the promise made to the people that historical access and use will not be unnecessarily restricted. As is plainly stated and directed by Congress when the National Forests were created, the timber, water, pasture, mineral, and other resources of the forest reserves were for the use of the people. The planning document must be changed to better represent the multiple use concept and put less emphasis on preservation and conservation.

The plan follows requirements and application of restrictions required by the 2012 rule which are universally applied in wide-ranging general terms to the three separate forests. Local conditions and circumstances should guide decisions made about use of the forests. For example, the setbacks on streams and intermittent drainages are not based on science, and are imposed in a general centralized bureaucratic manner.

Comment #3: Setbacks and habitat protection should be limited and restricted to places where they are actually needed. Land use decisions should be carefully made by local administrators on a case-by-case basis, and based on actual conditions.

Comment #4: The future required monitoring program and planning process should include practical methods, and encouragement to remove restrictions on land use that are no longer necessary. There should be more attention given in the planning documents to removing unnecessary general restrictions when conditions, and different needs, change the necessity for the restrictions.

There are numerous general mandated idealistic verbiage in the document. Such as, "maintain or restore the integrity and resilience of aquatic, riparian, wetland and other groundwater-dependent ecosystems and watersheds, effects on habitat for SCC Populations, connectivity as an integral component to achieve ecological integrity, diversity of plant and animal communities and the long-term persistence of native species in the plan area. revised land management plans must be designed to sustain or restore, the need for soil productivity to sustain the productive capability of the land." These goals are incompatible with all kinds of uses of the forest.

Comment #5: The goals, objectives, and desired conditions in the document are too idealistic to be practical. The planning document needs to make it much clearer that all kinds of impacts are acceptable, and will be necessary, for many of the expected uses of forest resources.

This plan was written using the 2012 Planning Rule. Unfortunately, this rule was written with the purpose to identify more roadless areas, wilderness, scenic rivers, stop climate change, preserve habitat, and limit human use of the resources of our National Forests. Our National Forests were reserved with the guarantee that they would provide timber, grass, minerals, and other resources for reasonable use by the people. The BMNFLMP document does not meet that standard.