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: Regarding the Blue Mountains Forest Plan October 5, 2025

Umatilla National Forest Supervisor's Office

Blue Mountains Forest Plan Revision

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Pendleton, OR 97801

sm.fs.bluesforests@usda.gov

To whom it may concern:

Citizens for Balanced Use (CBU) is a non-profit 501(c)3 organization based in Gallatin Gateway, Montana. We have over 7000 members and 68 supporting organizations representing over 100,000 individuals in the NW U.S. CBU has members in Washington, Oregon, Idaho, Montana, Wyoming, and Northern California. CBU advocates for multiple use recreation, active forest management, and responsible resource development on our federally managed public lands.

CBU has been involved in the forest planning in Eastern Oregon since 2008 during the previous Forest Travel Planning process. During that time CBU made several trips to Oregon to attend meetings with the agencies to discuss the plan. The ROD was signed in 2012 by then deciding officer Monica Schwalbach. Shortly after that the Forest Travel Plan was rescinded because of the appeals and strong opposition. Shortly thereafter Monica Schwalbach was reassigned to a research center on the East coast. CBU had a good relationship with Monica during the process and in fact she contacted us shortly after taking her new assignment to let us know where the closure effort was coming from. She explained that the leadership in Region 6 had directed her to "get it done or else". Well, she was not successful in implementing travel planning in the Wallowa Whitman and in response Region 6 punished her and transferred her to the East coast.

Another effort was initiated on the Wallowa Whitman, Malheur, and Umatilla to create a new Forest Plan which was signed in June of 2018 by:

STEVEN K. BEVERLIN, Forest Supervisor, Malheur National Forest

ERIC WATRUD, Forest Supervisor, Umatilla National Forest

THOMAS MONTOYA, Forest Supervisor, Wallowa-Whitman National Forest.

This began the 90-day appeal process for this decision.

In July of 2018 I scheduled a meeting with the new Region 6 Supervisor James Pena to discuss the Blue Mountain Forest Plan ROD. I travelled to Portland with expectations to meet with Mr. Pena. I arrived at the Federal Building in Portland, went through the extensive security check, and was escorted in the elevator to an upstairs lobby. After waiting about 20 minutes in the lobby I was then escorted to a small office where I sat for another 10 minutes. Finally, a couple of DEI hires with dreadlocks and metal face jewelry entered the room and informed me that Mr. Pena was not available.

I spent the next 10 minutes explaining the importance of access to the Blue Mountains in Eastern Oregon and how the proposed Forest Plan will adversely impact the citizens in the area. It was like I was talking to a stone

wall. These 2 gentlemen knew nothing about the area, nothing about the forest, and nothing in common with the people who depend on these federally managed public lands for their very existence. It became clear to me that this plan and the closure of this forest was a preconceived agenda. Much like the previous travel planning effort this Forest Plan was a top-down closure document.

I only mention the history of planning in the Blue Mountains because the Forest Service rotates personnel on a regular basis. New leadership comes and goes like a revolving door. It is important for the deciding officer to know the history of planning by Region 6.

Now to the issue of this new Forest Plan revision and how it has evolved. Region 6 has been unable to close the Blues forests in their previous efforts so they have engaged in a new tactic. This involves forming an Intergovernmental Agency Committee they have named the Blues Intergovernmental Committee. (BIC) This is allowed under NEPA for the Forest Service to hold meetings with other local and state government officials to discuss Desired Conditions and create a draft proposal to release to the public. The BIC can be formed by the Forest Service but it must only contain representatives of the government.

The Forest Service formed this committee but, in the formation, they included a representative (Nils Christofferson) from Sustainable Northwest, an environmental group, as a voting member. He is on the minutes of record of the BIC as a voting member. CBU attended some of these meetings of the BIC and pointed out to the Forest Service the fact that having an NGO voting member on the BIC was a clear violation of FACA. Our concerns were ignored. Because Sustainable Northwest was allowed to be a voting member on the BIC we requested that CBU also have a position on the BIC but were denied.

You need to understand that the government representatives selected to be on the BIC by the Forest Service were hand picked and most had something to gain from being on the committee. Maybe it was related to a timber project, maybe a grazing lease, or maybe being able to adjust the lines on the map of designations that would benefit them personally. This issue was raised by members of the public during the meetings of the BIC but were ignored by the Forest Service.

The inclusion of an environmental NGO as a voting member of the BIC is a clear violation of the Federal Advisory Committee Act or FACA. The violation of FACA was brought to the attention of the Forest Service several times but it became clear that this was a top-down forest closure process being driven by Region 6 and nothing was going to derail this process again. Local residents and the public were going to be ignored. The history and culture of the area was not important.

In November of 2022 the Forest Service and the BIC announced several public meetings throughout the area of the Blue Mountains and the 3 forests involved in the Forest Plan revision. CBU travelled to Eastern Oregon and Eastern Washington to attend 6 of these meetings. Below is a summary of each meeting we attended.

I attended the first public meeting of the Blues Intergovernmental Council (BIC) Tuesday evening in Pendleton OR. The government agencies outnumbered the attendees at this meeting. This was not an opportunity for the public to weigh in on the new Forest Plan but rather a sales pitch to convince the public to support closing their public lands. The BIC was formed by the Forest Service shortly after the last Forest Plan was remanded by Chris French. Now the Forest Service is making another run at a new closure plan.

By putting together this council, the Forest Service is violating the Federal Advisory Committee Act (FACA). The Government Services Administration (GSA) is responsible for approving the Charter and membership of the BIC, but the BIC did not submit a Charter or membership plan to the GSA. The BIC stated last night they are not subject to FACA regulations. CBU provided each of the BIC members (10) who attended the meeting with a copy of the FACA regulations.

Somehow the BIC believes they can skirt the FACA regulations and make recommendations to the Forest Service with their closed forest "Desired Conditions". The violation of FACA by the Forest Service is ripe for litigation.

In addition to violating FACA, the BIC is violating the 2012 Forest Planning Rule. The Forest Service has not even established the Interdisciplinary Team (ID Team) which is responsible for Public Scoping and the development of the "Desired Conditions". It seems the public is being left out of the process and a team (BIC) has taken upon themselves to develop their "Desired Conditions" for the Forest Service to adopt.

It was clear from all the statements from the public at the meeting that the BIC process is flawed and a closed forest is not acceptable.

The next meeting is tonight at the Fire Station in Walla Walla from 6-8 pm, 2251 Howard Street. CBU will be there and will give updates. One final thought. Interesting how the BIC would start their round of public meetings during opening season of elk hunting.

The second meeting of the BIC outreach was last evening in Walla Walla. 8 of the same BIC panel members from the Pendleton meeting were there to present their plan to about 20 members of the public. Again, the public was concerned about access and how much the public has seen closed over the last 20 years. No one on the panel could explain their lack of compliance with FACA. I asked the question how the BIC can develop recommendations to the Forest Service on "Desired conditions" when the ID team is not even been established, the "Purpose and Need" has not been released, and the formal "Scoping" has not begun. It was clear the BIC believes they can develop the "Desired Condition" outside of the NEPA process and present these recommendations to the Forest Service to be incorporated into the final Forest Plan without engaging the public. Clear FACA violation.

The panel continued to claim these current meetings were an effort by the BIC to take their input but the forum was not a formal comment opportunity but rather a "question and answer" period. The public was given time to ask a question (2-3 minutes) and then the panel members would field the question in the form of a sales pitch of why they did it and why the public should accept it.

Another member of the public asked why all 3 forests were being done at the same time and all lumped together in a single document. The Forest Service explained that this is the first time 3 forests have been combined in a planning effort but at the end all the 3 forests will be separated and each of the 3 Forest Supervisors will sign each of the plans for the forest they manage. This could be a sign of things to come during the objection process and how 3 different objection periods and hearings would be at the same time in different locations. It also seems like an effort to have the Malheur and Wallowa-Whitman follow the closed forest condition that currently exists in the Umatilla.

The Forest Plan is considered an overall landscape document that allows specific uses in the general areas of the forest. Much like a zoning document of a city or town, the Forest Plan is not site specific or a project level document. I asked the question why the "Desired Condition" document from the BIC was asking for a complete road and trail inventory when an inventory would be more appropriate in a "Travel Management" planning effort. The Forest Service responded that this inventory is required. It would seem the Forest Service has asked the BIC to insert this inventory into the BIC's "Desired Condition." So, one may ask who is driving the BIC? The County Commissioners? The Forest Service? And with a road and trail inventory you be assured that the Malheur and Wallowa-Whitman forests are on track to becoming a closed forest, much like the Umatilla.

We should explain the difference between an open and closed forest. It simply means that all roads and trails in a closed forest are CLOSED unless posted open. In an open forest all roads and trails are open unless posted closed. A closed forest makes management very easy as the agency only has to sign those roads and trails that are open. Less signage, less material, less labor, and less management.

Shaun McKinney, the Wallowa-Whitman Forest Supervisor, stated at the meeting that "Travel Planning" on the Wallowa Whitman NF will begin immediately after the Forest Planning is complete.

The panel claims this is a completely new process. Never been done. I will be at the meeting tonight in Clarkston, WA, Asotin County Fire District Station, 2377 Appleside Blvd. 6-8 pm.

The third meeting of the BIC public rollout was last evening in Clarkston, WA. Only 7 members of the public attended including 4 firemen who were there because the meeting was held at their firehouse. These public meetings were poorly advertised and scheduled at a time when the good people of Eastern Oregon are busy getting ready for winter.

The government panel again began the meeting with their presentation and opened the question-and-answer portion of the meeting. I have become well known to the BIC presenters as I have attended every meeting. The 3 issues I focused on last night with my questions and comments were the road and trail inventory, the "Socioeconomic Report", and the timing of the Forest Plan revision.

The BIC has stated that all 3 forests were bunched together in creating a Forest Plan but in the end each forest

will sign the "Record of Decision" as separate actions. I asked when the split would occur. After Scoping? After the Draft EIS was released? Or when the pre-objection hearings were scheduled? Would all the objection hearings be scheduled at the same time in 3 different locations so people could not attend? Or would they be scheduled in a way where people could engage in the objection process in multiple forests that they may have an interest in? No one could give me a definite answer as the Forest Service has not yet started the process, but this is a very important issue.

At the Walla Walla meeting, when I raised the question of why the BIC has included a road and trail inventory in the Forest Plan, the Wallowa-Whitman Supervisor told me the 2012 Planning Rule required the inventory be included. I checked with our NEPA Specialist and he pointed me to 23.23L of the 2012 Planning Rule where it states: "The Forest Plan revision MAY include road and trail inventory." I pointed this out to the panel last night along with the fact the Forest Service does not have the capacity to complete an accurate and comprehensive inventory of all the roads and trails, including user created trails. The panel did not have a response to my statement but Supervisor McKinney did state that the public has provided him with lots of road and trail inventory information. The question is whether this information is complete over the entire forest. I think not.

My final statement at the meeting was in regards to the "Socioeconomic Report." We would encourage folks to look at the bottom of page 13 in this report. "What does IMPLAN measure, what does it not measure." The IMPLAN measures only the direct economic impact at a snapshot in time. It does not measure what our communities have lost. It does not measure the potential that could be realized. The IMPLAN is a modeling program with estimates and assumptions based on input and multipliers. Modeling can be manipulated based on the input data. In other words, flawed data in, results in flawed results. Incomplete or omitted data on the input side of modeling can also result in a false conclusion. Sometimes economic reports are manipulated to achieve a desired result by adjusting the input data. CBU is having our economic specialist looking at this report and will have more on our report analysis later, but I made sure the BIC was aware of what was missing in the report. Next meeting is Tuesday, November 1, in LaGrande at the David Gilbert Event Center, One University Boulevard from 6-8pm See you all then!

The BIC held its 4th public meeting of their roll out of "Desired Conditions" in La Grande last evening. A few more people attended this meeting and the same issue of losing access was foremost on all the public's questions and comments.

It should be noted that at every meeting to date there has not been any signup sheet to record who attended and none of the meetings have been recorded. There will be no record of these meetings.

It should also be noted that the hand outs for the public included a document from Baker County Commissioner Bill Harvey called the "Minority Report." The problem is this document was unreadable and garbled.

Commissioner Susan Roberts stated that she noticed this problem the day before but my question was why it was not fixed before the meeting. Was this an attempt to hide the "Minority Report" from the public on purpose? If this faulty document was noticed by Commissioner Susan Roberts 24 hours prior to the meeting It surely could have been corrected. It was not. This was unacceptable as all the people attending the meeting were not provided the complete and accurate information.

Citizens for Balanced Use provided the panel, one day prior to the meeting, with an article critical of Headwaters Economics. Headwaters Economics is listed as a contributor to the "Socioeconomic Report" which was completed for the BIC. This article from the University of Montana Bureau of Economic and Business Research pointed out that Headwaters Economics was using "the wrong variables and used the wrong statistical test" in arriving at their conclusions. In other words, the "Socioeconomic Report" provided to the BIC was potentially flawed. One might wonder why Headwaters Economics may create a flawed study to present to the BIC. We would point you to www.greendecoys.com for the funding sources and recipients of groups and organizations who work every day to remove people from the land. The panel failed to address this issue again at the meeting last night as I raised this same concern at the meeting in Clarkston.

At all these meeting the "Recreation and Access Desired Condition Report" is being given by Nick Myatt from the Oregon Department of Fish and Wildlife. This is interesting as Nick has been an advocate of closing roads, trails, and access to our forest. He is a member of the BIC and uses his position as an advocate from a biologist point

of view. (Elevating the importance of wildlife over human presence in the environment and on our public lands). Where is the advocate for public access on the BIC? When asked during the meeting last night if the recreation sub-committee of the BIC looked at all the objections, he said "they took them into consideration."

Commissioner Roberts told the audience at all 4 of the meetings I have attended that the BIC "looked at every objection" from the previous remanded plan and developed the "Desired Conditions" based on those specific objections. This is clearly not the case. The BIC has ignored the public's objections and has come forward with their "Desired Conditions" of closing the forest.

Our hope is that people will try to attend the meeting in Baker City tonight. Commissioner Bill Harvey will be running this meeting and he has been our champion to keeping an open forest. Tonight's meeting will be at the Baker High School, Small Gym, 2500 East Street from 6-8pm.

The 5th public meeting of the BIC in Baker City, presented a better representation from the public as over 70 people showed up to oppose the closed forest "Desired Conditions".

Commissioner Bill Harvey, started the meeting with a welcome and he was greeted by a public who showed true appreciation for his standing strong for an open forest.

To date, not one, of the meetings have been recorded, no sign-up sheet has been provided, but Baker County took it upon them selves to pass around a sign-up sheet to record the names and contacts of the public that attended.

I asked the question of Nick Myatt, East Region Supervisor for ODFW, "Why the desired conditions from recreation only included the adverse effects of recreation on fisheries, wildlife, and water and why he did not include the physical and mental benefits of recreation."

The BIC's desired conditions did not include the physical and mental benefits of recreation. The BIC should have invited professionals from the health care field to provide information to the BIC on the benefits of recreation on both mental and physical wellbeing.

Mr. Myatt who is also the head of the recreation component of the BIC responded by telling the audience that everybody should know the benefits of recreation on both the mental and physical health of the community. We believe that the BIC should have included this information in their desired condition to assure the Forest Service is aware of these important benefits.

The mining community was well represented at the Baker City meeting. Longtime residents, Ed Hart, and Ken Anderson, shared their historical knowledge of the importance of mining, minerals, and precious metals extraction that have contributed to the development of this community over decades of time going back to Lewis and Clark.

They also provided the history of Baker County and over time, has lost access to these minerals and mining. This loss of access has adversely affected families and their cultural way of life. Their emotional and heartfelt expressions drew silence on the crowd.

Ed Hart reflected on a time of his native American ancestors telling him to not let the federal government deceive you (paraphrasing).

This meeting was again dominated by concerns over the loss of access to our forest and heritage.

A question from the audience was asked, "I keep hearing from the commissioners that we did not get 100% of what we wanted. It sounds like you are being led to a predetermined path. How do you know that, if the plan has not been written? I want to know what each of you wanted, but did not get."

Commissioner Palmer explained that he wished for an open forest, but he did not say who was denying that in the desired conditions.

Commissioner Roberts stepped in and began lecturing the audience on how hard the BIC worked and how we all should be thankful for the work they were paid to do. She did not answer the question.

After Commissioner Roberts finished her rant, Commissioner Nash provided a similar response to Commissioner Palmer, in that he preferred an open forest outcome, but was denied in his request for an inclusion in the desired conditions.

Commissioner Harvey finished the question with the fact that Baker County has authority through their resource plan to accomplish the outcome of an open forest. It is clear it takes a strong commission to stand with the

people and prevent the federal government, in their attempt, in closing our public lands to human enjoyment and their livelihood.

The BIC consists of federal, state, tribal, county representatives, and one member of an environmental NGO. (Sustainable Northwest) One can only assume that the federal agencies represented on the BIC, with voting ability, were the ones to deny an open forest in the desired conditions.

Much of the testimony provided during the entire meeting reflected what families have lost, how the area was settled, and the hardships that were endured.

They also spoke on how the forest once provided the materials in forest products, minerals, metals, and food to make our communities populate and prosper.

The next meeting will be in John Day at the Grant County Fairgrounds, Trowbridge Pavilion, 411 NW Bridge St., from 6 to 8 p.m.

Hope to see everyone there. Look for continued updates on the meetings.

The 6th meeting of the BIC public roll-out of "Desired Conditions" was held in John Day on Thursday, November 3. I have attended all 6 meetings as a representative of Citizens for Balanced Use and Forest Access For All. It was an honor to represent these organizations at the meetings knowing the BIC scheduled the meetings during the first week of Elk hunting and the folks of Eastern Oregon were hunting and preparing for winter. The BIC public meetings where a real bust as attendance was dismal, except for Baker City.

Because this was the last meeting of the BIC which I will be able to attend, I took some time at the John Day meeting to point out the many problems with their work products they presented.

- 1) Violation of the Federal Advisory Committee Act
- 2) Flawed Socioeconomic Report
- 3) Flawed Recreation Report
- 4) Combining 3 forests in one plan, separating into 3 plans at some point, could be a violation of NEPA.
- 5) The Forest Service does not have the capacity to accomplish a complete road and trail inventory in the Forest Plan. Many roads and trails will be missed, removed from the map, and gone forever. Also, this inventory requires a site-specific analysis and would be more appropriate to be done in a Travel Plan. The 2012 Planning Rule does NOT require any road or trail inventory or analysis in the Forest Plan revision but the BIC has included this in their "Desired Condition".
- 6) The "Desired Conditions" are titled "Final." Will changes be made after these meetings. Most likely not.
- 7) At every single meeting there was never a sign-up sheet for attendees, the meetings were never recorded, and the public's comments and testimony were not captured.

Commissioner Roberts stated at every meeting that they took the objections from the last plan that was remanded and created the "Desired Conditions" based on the 350+ objections. When questioned on this fact she admitted the BIC NEVER read the objections.

So, what is really going on? Here is my view of what the federal and state agencies are doing and how this entire process is flawed. Chris French, Forest Service, D.C., remanded the last decision and asked the Commissioners to try and bring forward a proposal based on input from the citizens in their county. But rather than engage with their citizens, they each had a specific concern personally.

Commissioner Roberts wanted a closed forest and stated this fact at one of the meetings. Commissioner Palmer wanted salvage logging and harvests. Commissioner Nash wanted a lower threshold of stubble height for livestock grazing. Commissioner Harvey demanded "Coordination" in complying with the Baker County Resource Plan and maintaining an open forest.

The federal and state agencies needed the counties support for any new plan and illegally convened the BIC in violation of FACA. The Forest Service formed the BIC to solicit their recommendation. But during the entire process the Federal and State agencies were driving the process, specifically Region 6 in Portland. In the end these state and federal agencies threw what I call a "few scraps" to the counties to get them to endorse the "Desired Conditions." What this did was to divide the counties. (Divide and Conquer) Exactly what the BIC was designed to do.

The counties could have learned of coordination and educated themselves on the power of coordination. The

only county with a valid Resource Plan is currently Baker County and if the new commissioners after the election stand strong, only Baker County will succeed in keeping access to their forest open. It is sad to see the county's settle for a few scraps at the expense of their economy and people's well-being.

CBU and FAFA will continue to keep a close eye on the Forest Plan process. We will determine the appropriate time to challenge the process and plan when needed and keep our members and supporters informed on how YOU can help.

The final meeting is scheduled on November 9th, in Enterprise at the Cloverleaf Hall, 668 NW 1st St., from 6-8 PM. Hope folks from that area will attend.

Clearly these meetings were designed to simply check the box that the agency complied with NEPA is holding public meetings on the Scoping and Desired Conditions. These meetings were never designed to solicit feedback on the proposal. If these meetings were held to obtain feedback from the community there would have been a sign-up sheet and the comments would have been recorded. No sign-up sheet was provided and no one recorded the comments. The agency's minds were already made up. Shawn McKinney is driving this boat for Region 6 and the Portland closure crew.

The proposed plan has a designation of "Semi-Primitive Non-Motorized" which would indicate these areas as inappropriate for motorized use. In Forest Plans that have been implemented in the Custer Gallatin National Forest and the Helena Lewis and Clark National Forest these same classifications were used. When the final ROD was signed the Forest Service issued a statement that all motorized use of these areas would be removed within 2 years. The Blue Mountains Forest Plan will most likely follow this same action but the Forest Plan currently does not notify the public of this possible action.

I have emailed and communicated with Shaun McKinney on this specific issue but he has failed to give me a specific response. Here is my specific question to Shaun McKinney:

"Will these areas designated as "Semi-Primitive Nonmotorized" in the Forest Plan be analyzed in the possible subsequent travel plan for open to motorized use, or will they be outside of the scope of subsequent travel planning because of the non-motorized use applied during the forest plan?"

Here is an excerpt of his email response:

"It is my understanding that a theoretical travel management plan in the future could analyze areas designated Semi-Primitive Nonmotorized (not by the Forest Plan) for open to motorized use."

I do not believe this response aligns with what I have witnessed other forests doing. Just because it is Shaun McaKinney's "understanding" does not mean his understanding is correct. I think Shaun McKinney is dodging the question. I am requesting a specific answer to this question and the answer should be included in the Administrative Record of the proposed Forest Plan.

The Forest Plan should specifically state that all areas of the forest with historic motorized use will be maintained. If the Forest Plan has specific designations of non-motorized it would stand to reason that any Part B Travel Planning action would remove the historic motorized use from that area and in fact the Travel Planning may state that motorized use in areas of the forest designated as Semi-Primitive Non-Motorized may be considered outside the scope of any future Part B Travel Planning. It has been my experience this has occurred in other forests and therefore I request it be clearly addressed in this Forest Planning document. The response to this question from Shaun McKinney is clearly not sufficient and unacceptable.

Until any future Travel Planning action is taken, this proposed Forest Plan must clearly state that in the 2 forests where Travel Planning has not occurred, and where cross-country travel is allowed, that cross country travel will continue to be allowed. If this is not specifically stated in the Forest Plan, the Forest Service is using the Forest Plan as a Travel Planning document which is a clear violation of NEPA. In fact, this action could be considered a violation of CFR Title 18, Part 1, Chapter 47, 1001 (a)(1) which states "Falsifies, conceals, or covers up by any trick, scheme, or device a material fact"

The Forest Service must clearly state and inform the public as to what any subsequent Travel Planning action

would consider as it relates to decisions which are made in the Forest Plan. A statement from one Forest Service employee that it is his "understanding" is not sufficient.

The plan should include a complete road and trail inventory. Specifically identify all roads that qualify as RS2477 and were transferred under statute to the state and counties. These right of ways are under the jurisdiction of the state and counties and must not be removed, decommissioned, or obliterated without consent of the state and counties. The current proposed draft Forest Plan does not identify any of these roads. CBU requests this inventory be completed and reviewed by the counties for accuracy.

The current proposed Forest Plan failed to complete an acceptable socio-economic analysis. The Forest Service's mission of providing services to the public in support of local communities has not been addressed. Businesses that rely on products and services provided by the Forest Service managed land has not been mentioned in the plan. CBU requests the Forest Service identify businesses dependent on the Forest Service managed land and document what uses are necessary to support these businesses. This may include but not limited to timber production, mills, access to mining claims, mineral deposits, agricultural grazing, water containment facilities, water conveyance facilities, access to private inholdings, etc. Maintaining access to these uses is critical in support of the businesses and the economies of communities. The proposed Forest Plan must include any possible adverse impacts to businesses and communities as a result of the plan.

Access by the public to the Forest Service managed land is important to the social well-being of the communities. The preservation of the historic and cultural use of this public land is important and has a far-reaching effect on the economic and public health of the residents living in the area of the 3 forests. The proposed Forest Plan has failed to analyze any adverse effect that closing access to the public will have. Clearly the Forest Service has ignored the residents use of the forests for subsistence. This may include but not limited to food source (hunting, berries, mushrooms), firewood, etc. The additional fact that with aging demographics in this area the public needs motorized access to these forests. Not only access on roads and trails but also cross-country travel to provide access to these subsistence products. The Forest Service failed to analyze the cultural and historic subsistence uses and the adverse effect of losing access to these products will have on the public.

The Forest Service has reduced the amount of suitable timber base in the proposed Forest Plan. The Forest Service has reduced the acreage and AUMs for suitable grazing in the proposed Forest Plan. The Forest Service has identified areas of Semi-Primitive Non-Motorized areas in the proposed Forest Plan without an accurate and complete inventory of roads, trails, and historically used areas of motorized use. All these decisions are arbitrary and capricious without adequate and accurate detailed reasoning.

CBU believes the Forest Service has failed in the development of the proposed Forest Plan in several ways. This plan is almost identical to the 2018 version which was ultimately remanded. We were told that the Forest Service would pursue a new direction and include the public in the development of a Forest Plan. This clearly did not happen as the BIC was appointed and they are responsible for this current draft. There was no collaborative groups involved. There were no businesses involved. And there were never any public meetings to ascertain the cultural and historic needs of the public and the communities in the area. The Forest Service never attempted to survey the public on what their desired condition were or what the final plan should include. This proposed Forest Plan is a top-down developed document driven by Region 6 in Portland. The leadership in Portland has no connection to the people of Eastern Oregon and the Blue Mountains. They know nothing of the historic culture of the area and have nothing in common with the rural residents of Eastern Oregon.

Promises made by the Forest Service when the last plan was rescinded was to engage with the public and the residents of eastern Oregon in the development of a new Forest plan. This was not done and no effort was made. Instead, the Forest service appointed a committee of local and state government and included a member of an environmental NGO as a voting member in violation of FACA. This action has further eroded the public's trust of the Forest Service. CBU requests these proposed Forest plan be scrapped and the Forest Service must keep their word and engage with the public, local communities, and businesses in developing a ground up rather

than top-down Portland driven plan!

Sincerely,
Kerry White

Executive Director
CBU