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Comments: To Forest Supervisors:
Most of the comments included in this letter apply to the Malheur National Forest, and more particularly to the former Long Creek and Bear Valley ranger districts, now known collectively as the Blue Mountain Ranger District. The geology and geomorphology, topography, soils, and, to a lesser extent, the climate differ from the other two districts. Together these factors impact watershed function in ways that vary from the other two districts. For these reasons, the revised forest plan should retain flexibility in addressing environmental standards and controls. However, retaining flexibility by the use of guidelines instead of standards, is unlikely to provide adequate protection when ground-disturbing activities are implemented and should be considered a false choice. Because of soil types and condition (heavy to clay) and the hydrological regime, standards should be used to protect watershed function during and following ground-disturbing activities.

Much of the Malheur NF lies in a fire-adapted ecosystem in which the natural fire regime is highly altered currently. The Revised plan should address this management condition by recognizing the need to restore the forest conditions that would support a more natural fire regime over much of the forest. This approach and the development of an aligned alternative should de-emphasize timber production initially and emphasize the types of activities needed to move toward more natural fire regimes in the 3 major fire regimes described by Agee (1996) in "Fire Regimes of the Pacific Northwest" as updated by newer science or similar publications. Following this kind of science probably requires treating acres of small diameter material and creating openings of the sizes described in the moister and colder forests. These activities are likely to require investments rather than providing receipts of the traditional Forest Service timber sale model. However, much of the Malheur NF does not meet the definition of forest used by many conservation and industrial entities --closed canopy or where there is a surplus of water or something similar. The MNF meets the quite different FS definition of at least 10% canopy cover; the revised Malheur Plan should reflect these conditions and definitions. Timber production should be evaluated and calculated only after investments in restoring a fire ecosystem are described (the return on investment for "fuels treatments" should be calculated on the likelihood of reductions in costs of fire suppression, not timber production in this day and age). Timber production analyses should also take into account the removal of the many of the most valuable trees historically which has reduced the number available currently; centuries-old trees cannot be re-grown in the 100-150 years that have elapsed since European settlement. This approach might allow industrial entities to "right-size" mills or make the economic case for a different approach that more closely fits the local situation. The trade-offs of a fire-adapted approach on wildlife, especially big game, should be re-examined and fully disclosed. I am concerned that as long as the Malheur NF continues to approach forest management as though it lay in a wetter climate with richer soils, certain tensions and struggles in the community will continue and likely reduce the amount of meaningful and true progress in addressing wildfire in a fire-adapted ecosystem that could be achieved under the forest plan revision.
/s/ See text box