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Recommendations for the Blue Mountain Forest Plan Revision:

History:

When the first White men first viewed the forests of the Intermountain West, they were in awe of the massive trees spaced widely and with grass on the ground. The grass on the ground provided soil stability and the carbon stored in the soil under the grass provided water storage in the soil. The USDA estimates that every percentage point of Carbon stored in the soil will allow the storage of an additional half inch of soil moisture, thus water was stored in the soil, offering drought relief. The grass also provided food for the wildlife.

It was presumed by many that this magnificent old growth forest was a result of nature operating unhindered and unaided. This is not the case. The Native Americans managed their forests to provide shelter for the wildlife and to provide grass for food for the wildlife. If the trees got too thick, or the pine needles on the ground got too thick, the grass had insufficient sunlight to stay healthy, the wildlife would leave for "Greener Pastures." Before this happened, the Native Americans would burn the pine needles and dog hair thickets. If the large trees got too thick, they would build a fire around a single tree to kill it. This would maintain the wildlife habitat so the wildlife was available when they needed it. The process is not that different from modern ranching, except ranchers today have wire for fencing, so they have more control, and can select the animals they will raise.

I have talked with experienced ranchers with forested grasslands about the optimum tree density for tree growth and grass growth. The answer I got was that the optimum density of trees for grass growth was also the optimum density for tree growth. The trees provide some shade for the grass, and prolong the growing season as well as shading the snow pack in the spring, slowing the spring melt off and extending and stabilizing stream flows. Grazing and wildlife habitat, timber production, and carbon sequestration were all optimized by this process.

In the 1950's and 1960's, the logging of the forests got overly aggressive, and a movement to preserve the forests was started.. Their perspective was that too much cutting was being done so the solution was to stop cutting. The value of good forest management was obscured by bad management. Following this no cut perspective has resulted in devastation of the forest lands and the economy dependent on it. We now have a forest where the trees are too crowded and are stressing each other for water. When a tree has sufficient energy

and water resources, and a bark beetle starts chewing its way through the bark, the tree can generate pitch and push the beetle back out the hole he just chewed. Sometimes you can see a little bit of pitch hanging out of a hole with a drowned bark beetle on the end. The tree has defended itself. When trees are too stressed for water, they can not defend themselves from attack. The beetle will drill into the cambium layer, and start up, eating and laying eggs. The eggs will hatch into grubs which start off chewing horizontally, effectively girdling the tree and killing it. Then the bugs chew their way to the surface and fly off to find another tree to kill and repeat the process. When the trees are stressed for water, this can spread like a slow fire, killing a whole forest. The result is a very dry forest with very high fuel loads that can explode into a conflagration that will kill many healthy trees and much wildlife. We have seen many of these wildfires in recent years. Most of the carbon stored in the trees and in the soil is released to the atmosphere during these fires.

Watershed Functions:

Much of the water in the intermountain west comes in the form of snow. Ideally, the snow pack melts off slowly in the spring, providing water for aquifer replenishment, stream flow, fish habitat, irrigation and recreation. If the forest is too crowded, as most of it currently is, the snow hangs up in the tree canopy and sublimates away in the cold dry winter wind. It never reaches the ground. If the forest is too sparse, the sun melts it off too quickly. The streams flood early and then dry up early in the summer. A properly managed forest allows the snow to accumulate on the ground and melt off slowly in the spring.

Restore old growth function and eventually old growth conditions with the following protocol:

1. Mark for removal all these that are dead, dying or diseased, with the possible exception of one snag per acre for wildlife. This includes all trees that have developed flat tops, no matter how large. These trees have accumulated maximum carbon and will begin to release it back into the atmosphere as they decay. Used for lumber, the carbon is sequestered for a much longer time.
2. Mark the largest, healthiest and fastest growing trees to remain until the appropriate basal area for the climate and moisture of the particular site is approached. This is standard forestry practice. Then mark a few of the smaller but fastest growing and healthiest trees to remain also.
3. Remove all remaining unmarked trees. This is necessary to reduce fuel loads to manageable and sustainable levels, and to allow the large healthy trees reach their genetic potential.
4. Plant native grass in areas without functioning sod, except in areas where replanting of trees is needed. Where replanting is needed, wait for planting native grass until the newly planted trees are head high.
5. Leave all roads necessary for logging open for fire fighting purposes and public access. Temporary signed closures for wildlife concerns such as elk calving could be allowed as necessary.
6. Allow firewood gatherers to operate freely within the forest and be allowed to remove any dead tree except for marked wildlife trees. This will assist in reducing excessive dry fuel loads.

7. Repeat every 15 years.

8. Develop a program similar to the Oregon Department of Forestry's Rangeland Fire Protection Association Program for all Federal Lands. This would mean the local people living in the area and willing to train would be equipped to fight fires when they are small. They don't need to be paid. They have adequate reason to defend their own property, and the federal property they enjoy. Many of the Rangeland Fire protection Associations will have most of their fires extinguished at under an acre and before dark on the first day.

9. Process a generic EIS for salvage logging after a fire or bug kill so logging of dead timber can begin immediately after the death of the trees, thus allowing for quick replanting and forest restoration. Waiting until the timber is unusable due to rot before attempting logging is a waste of resources, and a waste of growing time.

10. Minimize future reservations from manageable lands such as wilderness areas, The Eagle Cap Wilderness, and I expect many others, is a festering collection of jackstrawed burned out trees, a natural reforestation of dog haired thickets, growing up overcrowded and ready for another bug kill followed by a conflagration that will spill death and destruction on her neighbors, whether it be private property or other National Forest or State lands. Access restrictions prevent adequate fire fighting or other management that would allow returning the site to Old Growth conditions. Many wilderness areas have been designated as such by the expedient of erasing the existing roads on the map and closing the roads so it can be inaccurately designated wilderness, despite the fact that the originally built logging are still operational with a little cat work where closed. These fraudulently declared wilderness areas should be restored to functional management.

11 Since with these prescriptions in place to manage fuel loads, there is less need to allow wildfires to continue as unanticipated control burns, the Forest Service shall fight all forest fires aggressively.

12. Invest in or contract with private operators to have available in the region a Single Engine Air tanker equipped with infrared cameras and sensors so that after a lightning storm, which is the primary ignition source in this area, the aircraft can be airborne at first light to scan areas where lightning strikes were noted by existing monitoring equipment. It could dump water or retardant on hot spots as well as alerting all fire fighting agencies including property owners, so fires are extinguished before they become unmanageable.

Legal Requirements for the Forest Plan:

The following are excerpts from Title 16 conservation from the United States Code.

[sect]475. Purposes for which national forests may be established and administered

All public lands designated and reserved prior to June 4, 1897, by the President of the United States under the provisions of section 471 1 of this title, the orders for which shall be and remain in full force and effect, unsuspended and unrevoked, and all public lands that may hereafter be set aside and reserved as national forests under said section, shall be as far as practicable controlled and administered in accordance with the following provisions. No national forest shall be established, except to improve and protect the forest within the boundaries, or for the purpose of securing favorable conditions of water flows, and to furnish a continuous supply of timber for the use and necessities of citizens of the United States; but it is not the purpose or intent of these provisions, or of said section, to authorize the inclusion therein of lands more valuable for the mineral therein, or for agricultural purposes, than for forest purposes. (June 4, 1897, ch. 2, [sect]1, 30 Stat. 34.)

[sect]528. Development and administration of renewable surface resources for multiple use and sustained yield of products and services; Congressional declaration of policy and purpose

All public lands designated and reserved prior to June 4, 1897, by the President of the United States under the provisions of section 471 1 of this title, the orders for which shall be and remain in full force and effect, unsuspended and unrevoked, and all public lands that may hereafter be set aside and reserved as national forests under said section, shall be as far as practicable controlled and administered in accordance with the following provisions. No national forest shall be established, except to improve and protect the forest within the boundaries, or for the purpose of securing favorable conditions of water flows, and to furnish a continuous supply of timber for the use and necessities of citizens of the United States; but it is not the purpose or intent of these provisions, or of said section, to authorize the inclusion therein of lands more valuable for the mineral therein, or for agricultural purposes, than for forest purposes. (June 4, 1897, ch. 2, [sect]1, 30 Stat. 34.)

Comment: The recognized value of minerals lands in this law suggests that approving mining activities proposed within the National Forest after adequate environmental protection and bonding to assure restoration should be done immediately upon the submission of a suitable plan and bonding. All rights granted to the people by law including travel through the forest, firewood gathering, mining, and grazing should be allowed as specified.

[sect] 551. Protection of national forests; rules and regulations

The Secretary of Agriculture shall make provisions for the protection against destruction by fire and depredations upon the public forests and national forests which may have been set aside or which may be hereafter set aside under the provisions of section 471 1 of this title, and which may be continued; and he may make such rules and regulations and establish such service as will insure the objects of such reservations, namely, to regulate their occupancy and use and to preserve the forests thereon from destruction; and any violation of the provisions of this section, sections 473 to 478 and 479 to 482 of this title or such rules and regulations shall be punished by a fine of not more than \$500 or imprisonment for not more than six months, or both. Any person charged with the violation of such rules and regulations may be tried and sentenced by any United States magistrate judge specially designated for that purpose by the court by which he was appointed, in the same manner and subject to the same conditions as provided for in section 3401(b) to (e) of title 18. (June 4, 1897, ch. 2, [sect] 1, 30 Stat. 35; Feb. 1, 1905,

ch. 288, [sect] 1, 33 Stat. 628; Pub. L. 87-869, [sect] 6, Oct. 23, 1962, 76 Stat. 1157; Pub. L. 88-537, Aug. 31, 1964, 78 Stat. 745; Pub. L. 90-578, title IV, [sect] 402(b)(2), Oct. 17, 1968, 82 Stat. 1118; Pub. L. 101-650, title III, [sect] 321, Dec. 1, 1990, 104 Stat. 5117.)

Comment: Adequate provisions for protection from fire require fuel reduction, moisture preservation, Firefighting response, and access preservation. These actions are all provided in the prescriptions above.

[sect] 551c. Planning for fire protection

(a) Volunteer firefighters

The Secretaries of Agriculture and the Interior shall annually offer training programs to

certify volunteers for suppressing forest fires on National Forest System lands, National Park System lands and Bureau of Land Management public lands in the event that the appropriate Secretary determines that such volunteers are needed. In carrying out this subsection, the Secretaries should utilize existing authorities to train volunteer firefighters for use in fire emergencies. The Secretaries should assess the capabilities of educational

institutions and other public and private organizations to provide such training programs.

Comment: This section, while not mandating item 8 above, it certainly permits it.