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Organization:

Title:

Comments: Blue Mountains Forest Plan Revision Team,

Re: Blue Mountains Forest Plan Revision DEIS: Joseph Canyon, Hells Canyon, and the Wallowas

I live in Vancouver, Washington, near the Columbia River Gorge, nearly a six-hour drive from the Wallowas, and I have made the trip many times. I have camped, kayaked, and hiked in the Eagle Cap Wilderness near Joseph, explored all around Hells Canyon, and taken a jet boat through it. I have taken many scenic drives through the Blues and consider them among the most beautiful places I have traveled. I am always amazed and delighted to see so much wildlife and biodiversity on my adventures through the region. The places I most want to name are Wallowa Lake, Joseph Canyon, and the country around Baker City.

I oppose this Draft EIS; I cannot support any of the three alternatives it analyzes. I would like to see this wild country preserved, especially in light of its historical and cultural significance for our Native American friends. The final plan should protect it first: no commercial logging, a phase-out of livestock grazing, stronger big-tree protection than the current rules, wilderness recommendations for places like Joseph Canyon, and binding protection for roadless areas and wildlife corridors.

Joseph Canyon qualified as wilderness and was dropped

I am amazed at the greenness of Joseph Canyon, where I have seen deer, mountain sheep, and eagles. The Forest Service's own Wilderness Evaluation Report agrees it is special. It evaluated the Joseph Canyon roadless area (Evaluation 2021, 7,103 acres) and rated it yes for solitude, primitive recreation, other features, and manageability, and yes for naturalness with a boundary adjustment. Joseph Canyon is one of seven areas, together about 75,100 acres, that qualified on every criterion and still were not carried forward into any alternative. The nearby Grande Ronde roadless area (Evaluation 6030, 6,196 acres) is another.

The DEIS says the areas it left out were dropped "because of the need for wildfire risk reduction in those areas" (p. 328), but that is not what the evaluation found, and Joseph Canyon passed manageability outright. Across the three forests the Proposed Action recommends no wilderness at all, and Alternative 3 about 34,000 acres of small additions (p. 49), compared with roughly 70,500 acres favored in the 2018 Final EIS. I ask the Forest Service to recommend Joseph Canyon, the Grande Ronde area, and every other qualifying area for wilderness, and to explain the retreat from 2018.

Supporting Indigenous-led conservation in the Joseph Creek watershed

I love the history of the Native American peoples and their deep ties to these waterways for travel, trade, and food. The Joseph Creek watershed is the setting for Camas to Condors, an Indigenous-led conservation effort, yet the DEIS does not mention it. I support Tribal consultation, treaty obligations, Tribal sovereignty, and Indigenous-led conservation, including that work. The plan's single Tribal standard (FW-TRI-STD-01, p. 157) is a starting point, and I ask the Forest Service to give full weight to what the Tribes ask for in consultation.

Keep the corridor open

The canyons north of the Wallowas connect Hells Canyon with the Wenaha-Tucannon country, and that connection matters to wide-ranging animals. The 1990 plans require connections between old forest stands (p. 28), but both action alternatives drop that requirement, and the plan says connectivity does not mean creating corridors (p. 129). FW-LPC-GDL-01 guards identified linkages from barriers (p. 131), yet the plan identifies none. I ask that the Northern Grande Ronde corridor, including Joseph Canyon, and the Lake Fork linkage between the Eagle Cap and Hells Canyon be mapped and protected by standard, along with the climate refugia animals will need, using public connectivity data such as Migrations in Motion and Law et al. (2022).

Bighorn sheep and livestock

The mountain sheep I saw in Joseph Canyon are vulnerable to disease from domestic sheep; the DEIS calls that the biggest threat factor to them (p. 36), and the Malheur's current plan flatly prohibits stocking domestic sheep in bighorn range (p. 101). Where the current plans protect bighorn through forest-wide standards, the revision relies on a guideline for disease transmission (p. 36). The revised plan meanwhile pursues additional livestock use (FW-RNG-OBJ-01, p. 176), encourages restocking vacant allotments (p. 178), adds targeted grazing (p. 29), and

turns today's utilization standards into guidelines (pp. 99, 178). I ask that domestic sheep be barred from bighorn range on all three forests by standard, and that livestock grazing be phased out, beginning with bighorn range, riparian areas, roadless areas, and recommended wilderness.

Wildfire and evacuation

I have seen wildfires up close, far away and near home, and I have been under a mandatory evacuation order because of a fire in the forest directly behind my house. I worry about increased wildfire risk and its impact on wildlife. So I care that fire policy works. The plan's Community Protection Areas are defined as "Any area where the built environment meets wildfire prone areas" (p. 237), with no distance limit, and in them fuel work may depart from forest-wide ecological direction (p. 122). What protects homes is the condition of the home and the ground right around it (Cohen 2000; Calkin et al. 2023). The DEIS's own model shows dry-forest fire potential nearly the same under the Proposed Action and under an alternative logging less than half as much (Tables 6-8, pp. 40-43). I ask that Community Protection Areas be bounded by distance from structures and that fire not be used to justify backcountry logging.

Trees, logging, and roadless areas

I like the native ponderosa pine and fir trees in particular. The Screens protect most trees 21 inches and larger (p. 19); the action alternatives remove or weaken that limit (Table 21, p. 76) and authorize cutting old and large trees (p. 142). I ask for a standard protecting all ponderosa, fir, and other trees at least 21 inches across and all trees at least 150 years old (p. 140), with no salvage exemption, and for old-growth areas to stay closed to harvest (p. 95). The Proposed Action would more than triple projected timber output (Tables 3-5, pp. 22-23); I ask for no commercial logging. About 722,000 roadless acres would lose protection (p. 61), and Alternative 3 relies on a national rule proposed for rescission (p. 222); the prohibitions belong in the plan.

Other issues for the record

Guidelines allow departure by definition (p. 107), and salvage is exempted from snag and harvest limits (pp. 143, 173-174). Riparian management objectives are dropped, riparian widths can shrink (p. 200), key watersheds are not plan components (p. 259), municipal watersheds get one guideline and an approach favoring harvest (p. 208), and effects on listed fish remain to be determined (Table 18, p. 65). No road-density limits or decommissioning objective exist (pp. 37-38, 160). By the DEIS's own carbon modeling the Proposed Action does worst (p. 39), and the revision includes no climate or carbon direction at all. Goshawk and pileated woodpecker disappear from the species lists (Table 26, p. 96). Research on big trees, fire, and carbon is missing from the reference list (pp. 69-72), and supplemental documents including compliance documentation (p. 63) were never published, according to the July errata. Protection-focused alternatives were dismissed (pp. 3-4) and should be analyzed.

My requests

- 1.Recommend Joseph Canyon, the Grande Ronde area, and every other qualifying area for wilderness.
- 2.Support the Indigenous-led conservation work in the Joseph Creek watershed through consultation.
- 3.Map and protect the Northern Grande Ronde and Lake Fork corridors by standard.
- 4.Bar domestic sheep from bighorn range and phase out livestock grazing.
- 5.Bound Community Protection Areas by distance from homes.
- 6.Protect all trees 21 inches and larger and all trees 150 years or older; end commercial logging; write roadless protections into the plan.
- 7.Release the supplemental documents the July errata admits were never published, invite comment on them, and study a protection-first alternative in detail.

Please respond to these issues in the Final EIS. I reserve my right to raise them in the objection process.

Marilyn Oltmann

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