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Organization:

Title:

Comments: Blue Mountains Forest Plan Revision Team,

Re: Comments on the Blue Mountains Forest Plan Revision DEIS: roads, roadless areas, and the Mill Creek watershed

I write as a scientist who lives in Santa Cruz, California, and whose son lives in Walla Walla, recreates in the Blue Mountains, and drinks water from the watershed. My son enjoys drinking clean water and fly fishing for trout there. Tiger Creek canyon above Walla Walla was my own first easy access to the spectacular landscape of the Blue Mountains, and the Mill Creek watershed and the Wenaha-Tucannon Wilderness are particularly dear to me. I have found calm along the waters of Mill Creek, with its clean air and cool water. Conserving this region as a gateway to nature, hunting, and fishing is paramount to a healthy quality of life for me and my family.

I object to this Draft EIS; none of its three alternatives earns my support. I ask the Forest Service to adopt a protection-first plan: no new access roads, no commercial logging, a phase-out of livestock grazing, strengthened protection for large and old trees, and a connected reserve system held in place by standards.

No more roads

There should be no more access roads created in these forests. The Proposed Action moves in the opposite direction. It "analyzes the Blue Mountains planning area as if a national-level decision rescinds the Roadless Rule" (p. 58), removes roadless protections from about 722,000 acres, and places about 494,000 acres in general forest suitable for timber production (Tables 14-16, p. 61), where the DEIS expects more frequent road use and additional skid trail and landing construction (p. 58). The DEIS also says the Proposed Action may carry the greatest risk of erosion and human-caused damage to cultural resources (p. 60).

The justification is thin by the agency's own account. The DEIS concludes that differences in roadless protection have "only a minimal influence on the overall timber program" once treatment objectives are adjusted (p. 60). Its own compliance table says the roadless regulations remain in effect unless and until a national decision is made (p. 67), so the Proposed Action is built around a policy that has not been adopted. Alternative 3 protects roadless areas only by requiring consistency with the Roadless Rule (p. 222), which USDA has proposed to rescind; that protection disappears if the rule does.

Beyond roadless areas, the revision abandons road limits altogether. The current plans are the only alternative with road-density metrics (p. 37), with open-road standards of 1.5 to 3.2 miles per square mile (Table 25, p. 96). Neither action alternative sets any road-density requirement or road-reduction goal (pp. 37-38). The transportation objectives cover maintenance of 750 to 1,500 road miles a year and nothing else; the word decommission does not appear in the plan (p. 160).

I ask for plan standards prohibiting road construction, reconstruction, and commercial timber cutting in every inventoried roadless area, independent of the national rule; enforceable open-road-density standards; and a road decommissioning objective with specific miles and timelines.

Roads, ignitions, and invasive plants

I live five minutes from the Santa Cruz Mountains and have experienced climate-driven fire there, notably the CZU Lightning Complex. What worries me about the Blues is increasing aridity, vulnerability to fire, and

succession by non-native invasive vegetation. Roads bear directly on all three. Human-caused ignitions concentrate along roads (Balch et al. 2017; Downing et al. 2022), yet the DEIS does not analyze how opening roadless country would change ignition risk. Roads also spread invasive plants; the DEIS itself notes that limiting management in recommended wilderness means fewer vectors for invasive species (p. 50). The Proposed Action's targeted grazing adds another risk of non-native spread, as the DEIS acknowledges (p. 29). The Final EIS should analyze road-related ignitions and invasive spread for each alternative.

On fire more broadly, the DEIS's own model shows dry-forest high-severity fire potential of 14 percent under the Proposed Action and 13 percent under Alternative 3 at twenty years, though Alternative 3 cuts less than half the timber (Tables 6-8, pp. 40-43). Protected forests are presumed to burn worse (p. 30) without engaging evidence to the contrary (Bradley et al. 2016). Community Protection Areas have no spatial bound (p. 237). Fire policy should focus on homes and the ground around them, not on logging the backcountry.

The Mill Creek watershed

Under the Proposed Action, the Mill Creek Watershed roadless area would lose its roadless protection (pp. 61, 220). The plan's only component for the municipal watershed is a guideline, alongside a management approach that prioritizes timber harvest there (p. 208). The agency's wilderness evaluation found the Mill Creek Watershed roadless area had wilderness character but rejected it because it is a municipal watershed. I ask that the watershed be protected by standard from roads, commercial logging, and grazing, and that its roadless area be recommended for wilderness or given equivalent protection.

Streams and trout

I have seen too many damaged and neglected waterways across the West. Realizing that what remains is only a small fraction of what existed before so many rivers and streams were damaged disappoints me. I want to leave my children a better opportunity to enjoy undamaged wild lands and functioning natural ecosystems. The action alternatives drop the PACFISH/INFISH riparian management objectives, allow narrower riparian widths after watershed analysis (p. 200), keep key watersheds outside the plan components (p. 259), and leave effects on bull trout, steelhead, and salmon to be determined (Table 18, p. 65). The DEIS predicts reduced water quality from the Proposed Action's log haul (p. 47). I ask for binding riparian standards, mapped cold-water refugia, and disclosure of listed-fish effects before a decision.

Best available science

Decisions should be well informed by science and by traditional ecological knowledge. The planning rule requires the responsible official to use the best available scientific information (36 CFR 219.3). The DEIS reference list (pp. 69-72) omits the research most relevant to its central choices: work on large trees and carbon (Mildrexler et al. 2020; Stephenson et al. 2014), on fire severity in protected forests (Bradley et al. 2016), on roadless areas and water (DellaSala et al. 2011), and on strategic forest reserves (Law et al. 2022). The Final EIS should document how this literature was considered. The DEIS also relies on supplemental documents, including its legal-compliance documentation (p. 63), that the July errata acknowledges were never published; they should be released for public comment.

Logging, grazing, big trees, and wilderness

- The Proposed Action would raise projected timber output to about 364 million board feet a year, more than three times the current plans (Tables 3-5, pp. 22-23). I ask for no commercial logging. - The plan pursues additional livestock use (FW-RNG-OBJ-01, p. 176) and demotes utilization limits to guidelines (pp. 99, 178). A reduced-grazing alternative was dismissed (p. 3). Grazing should be phased out, beginning with riparian areas, municipal watersheds, roadless areas, and recommended wilderness. - The Eastside Screens protect most trees

21 inches and larger (p. 19); the action alternatives weaken or remove that limit (Table 21, p. 76) and authorize removal of old and large trees (p. 142). The final plan should protect all ponderosa pine and other trees of 21 inches and up, and all trees 150 years or older (p. 140), by standard with no salvage exemption; salvage is currently exempted from snag and harvest limits (pp. 143, 173-174). Old-growth areas should remain closed to harvest (p. 95). - The Proposed Action recommends no wilderness; Alternative 3 about 34,000 acres (p. 49), against roughly 70,500 acres favored in 2018. About 75,100 acres rated fully qualifying were dropped, with an Appendix G wildfire rationale (p. 328) the evaluation record does not support. - The requirement to connect old forest stands is dropped (p. 28), no corridors or refugia are identified (p. 131), and goshawk and pileated woodpecker are on no species list (Table 26, p. 96). - The Proposed Action leaves the least carbon on site (p. 39), and there are no climate or carbon plan components; a carbon-focused alternative was dismissed (p. 4). - Most protections are guidelines, which by definition allow departure (p. 107).

Tribal consultation

I have worked closely with Indigenous peoples in New Zealand, and it is imperative to hear and respond to their concerns and suggestions. They have the longest-term connection with land and natural resources, and their voice on these matters is as important as the land itself. I support consultation with Tribal nations, their treaty rights and sovereignty, and conservation that Indigenous communities lead, and I ask that the plan's single Tribal standard (p. 157) be treated as a minimum.

Requests

1.No new roads; roadless prohibitions written into the plan as standards; open-road-density standards; a decommissioning objective with miles and timelines.

2.Analysis of road-related ignitions and invasive spread for each alternative.

3.Standards protecting the Mill Creek municipal watershed and recommendation or equivalent protection of its roadless area.

4.Binding riparian standards, mapped cold-water refugia, and disclosure of listed-fish effects.

5.No commercial logging, a phase-out of grazing, and a standard protecting all trees 21 inches and larger and all trees 150 years or older.

6.Documented consideration of the best available science, and release of the missing supplemental documents for comment.

7.Detailed analysis of a protection-first alternative in the Final EIS.

There should be no more access roads created, and land management should reflect everyone with a stake, not be left solely to decisions by federal land managers. I ask that the Final EIS address each of these issues, and I reserve the right to raise them in the objection process.

Josh Adams, Santa Cruz, CA