Data Submitted (UTC 11): 10/27/2024 7:00:00 AM
First name: Frances
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Organization:
Title:
Comments: Responsible Officials,

I am Frances M. Preston and I reside on the Malheur National Forest in Grant County, Oregon in the City of Prairie.

I offer my comments for the Blue Mountains Forest Plan Revision Release Final Assessment and Draft Preliminary Need to Change. Due in your office by November 7, 2024.

News Release

The News Release first paragraph states. 'These documents present existing conditions about the Blue Mountains National Forests. Input gathered from the feedback period, and the eight public meetings held in April 2024, reflected local knowledge about existing conditions, concerns, and perceptions regarding social, economic, and ecological systems, and was used to revise the draft Assessment and produce the Final Assessment Summary and Final Assessment Reports." How can this be? I find it alarming that when I review the Final September 2024; 103 pages against the Draft March 19, 2024; 101 pages. I find little and no significant change except for the noted change on Page 66 in the documents. How can this be? Did you not receive any input or little input from the public? Or perhaps you have chosen to not use the input you received. Which is it? Below are the changes I found in the Final Summary Assessment Report:

Summary Assessment Report Team l addition; Page l 14 page number changes; Page 2 2 websites; Page 3 l website and 1 cited reference; Page 7 1 removal 2 new sentences; Page 8 l section added; Page 12 2 websites; Page 15 1 website; Page 18 3 websites; Page 21 removed 8

words; changed 2 paragraphs; Page 28 3 websites; Page 29 removed 1 sentence; Page 30 added a paragraph/changed Table format; Page 31 added/changed 1 paragraph; Page 34 added 5 words and removed l ; Page 35 3 websites and changed two words; Page 36 changed 2 paragraphs; Page 37 added 2 words and l website; Page 42 added l paragraph; Page 46 removed 7 words; Page 50 2 websites; Page 54 removed 7 words added l website; Page 55 Changed 1 paragraph; Page 56 Changed 1 paragraph; Page 58 1 website; Page 66 Removed BIC reference to Social Economic Report; Page 67 added 6 words; Page 68 removed mining in paragraph 5; Page 69 added 11 words and I website; Page73 1 website; Page 75 moved 3 things around; Page 76 added l paragraph; Page 78 1 website; Page 85 removed reference to Ochoco National Forest added a sentence; Page 86 Removed /added 1 sentence; Page 88 added 4 words; Page 90 l website; Page 94 added/removed 1 bullet point; Page 95 added 4 words; Page 98 3 edits; Page 99 added l sentence and 1 website; Page 102 1 website.

In the second paragraph of the News Release you say "As the revision process begins to transition from the Assessment Phase to the Plan Development Phase ..... " explain how you are ready to transition when you have not identified in the Final Summary Assessment Report any of the roles and contributions; to mention a few "Identify eligible wild and scenic rivers, identify wilderness inventory, and determine potential species of conservation concern?

Also, in the second paragraph of the News Release you say; "111e Draft Preliminary Need to Change document will be open for public feedback from October 8th until November 7th , 2024". Why does the public get less than 30 days right in the middle of the 2024 Primary Election not acceptable and not a great start for engagement with the Public we wish that you could respect us and treat us like 'We the People" that own these lands and who work hard every day to make sure you get paid?

Draft Preliminary Need to Change Malheur, Umatilla, and Wallowa-Whitman National Forests Known together as the Blue Mountains National Forests.

Comments:

2012 Planning Rule - page 3 first paragraph "that guides ecosystem management with concepts of sustainability, including its social, economic, and ecological components, and ecosystem integrity."

Federal Register Vol. 77, No. 68, Monday, April 9, 2012, Rules and Regulation~

Rationale for the Decision - 'The following paragraphs outline the rationale for the decision, including how Modified Alternative A meets the purpose and need and addresses the significant issues described in the final FEIS.": (1) Response to Purpose and Need; (2) Response to the Issue of Ecosystem Restoration; (3) Response to the issue of Watershed Protection; (4) Response to the Issue of Diversity of Plant and Animal Communities; (5) Response to the Issue of Climate Change; (6) Response to the Issue of Multiple Uses; (7) Response to the Issue of Efficiency and Effectiveness; (8) Response to the Issue of Transparency and Collaboration; and (9) Response to the Issue of Coordination and Cooperation Beyond NFS".

Follow-up needed: Request inclusion of all 9 items referenced in the 2012 Planning Rule pages 21173-21178

Last sentence "Importantly, the rule explicitly requires consideration of climate change as a system stressor and driver."

Follow-up needed: Reference where in the 2012 Planning Rule where it states this if that is not possible removal of the sentence.

1990 Forest Plan Direction is Inconsistent with the 2012 Planning Rule. Page 3

Follow-up needed: (1) It seems the need for change and assessment fail to specifically address how the 1990 forest plan is inconsistent with tl1e 2012 planning rule please explain. (2) It seems the 2Q 12 planning rule is not consistent with the 1990 plan please explain.

Plan Amendments Point to the need for Revision. Page 3.

Follow-up needed:

Please reference Attachment#! - Memo from Washington Office, March 14, 2019, 1570, Objection Response for the Umatilla, Malheur, and Wallowa-Whitman National Forests Revised Land Management Plans to Glenn P. Casamassa, Regional Forester, Region 6 from Christopher B French, Reviewing Officer for the Chief. First paragraph last sentence '1 am instructing you to withdraw the draft Record of Decision, FEIS, and the three Revised Plans. The existing Land and Resource Management Plans, as amended will remain in place." Second paragraph "My reason for this instruction is that many factors compounded to produce Revised Plans that would be difficult to implement. While my review did not identify and specific violations of law, regulation, or policy, significant changes have occurred over the 15-year time period of the planning process that led to my decision. For example, several plan content modifications occurred that were often complex and not well understood, and there were a number of changes in elected officials, organizations, other stakeholders, and key Forest Service staff. The Revised Plans also did not fully account for the unique social and economic needs of the

affected communities. The resulting plans are very difficult to understand and I am concerned that there will be ongoing confusion and disagreement as to how each Revised Plan is to be implemented."

Follow-up needed: Incorporation of this critical information into this document. Show the public what the FS Crosswalk is for these plans to assure us that the agency is not simply rolling over the 2018 Draft Forest Plans into these revisions: plus address the highlighted areas above with specifics as to what has been changed.

If the current forest plans are inconsistent with the 2012 planning rule, how is that a revision of the plan is warranted, and not a comprehensive new plan written and why is the agency utilizing a crosswalk of the 2018 effort?

If the 2014-2018 Revision that was withdrawn which was based on direction prior to the 2012 Planning rule, how is it not in compliance? Simply stated it was created after the 2012 Planning rule was established as the document to follow.

This is very convoluted (having a complicated structure and therefore difficult to understand). To the public the crosswalk means that the Agency has taken the 2014-2018 Draft Forest Plan Revisions attempted/or have successfully taken a lot; if not most, of the information and have moved it over to these current versions; I will call it 2027 Draft Revisions that the Agency is pretending to make the public and others think they have opportunities for new input.
How does this meet the Reviewing Officer for the Chief, Christopher B. French's direction in his March 14, 2019 (Attachment #1 attached)? The public expected new science and proper review to get this all figured out; however, it feels like the Agency is doing an expedited process to shove

the same document (2014-2018 Draft Forest Plan Revision) back out to "We the People". This is a big concern. Now is the time to show the people the Crosswalk work and tell us the truth about your true intents for the 2027 Draft Revision. It is expected that you will do two things (l) address this and (2) provide the truth.

Work together to create durable, implementable, integrated land management plans. - Page 4

Four discussion points: (1) The public has not been allowed into the process to create durable, implementable, integrated land management plans. (2) The public has consistently requested since 2019's withdrawal of the failed attempt to revise the forest plans to be engaged at the Blues Intergovernmental Council (BIC) and participate as co-equals in the planning process and have been denied access all along, while special interest groups and Congressional staffers have been allowed membership and an opportunity to set at the table at the detriment of those residents. (3) This feels like the Agency has created a focus around an effort to co-opt a system through the BIC that looks like the public can/is engaging when it (the public) is not allowed per the directions of the policies and procedures of the BIC. (4) The BIC is supposed to be an Intergovernmental body that is made up of elected officials and that is how it started out; however, it very quickly got co-opted into something where we have seen one Congressional Staffer and at least one non-profit Environmental Group that is listed on agendas and in minutes as members. Never allowing the public to participate in the process. This clearly is disingenuous to see when we thought all would work together to create a durable Forest Plans while the public was/is not allowed to participate unlike the other groups.

Follow-up needed: It is expected that each and every one of the above four items will be discussed/explained in depth as to appropriate of decisions made and the reasons why or as appropriate why not.

Address Contributions to Social and Economic Sustainability - Page 4

This is the one perhaps of greatest concern. Item (1) Why is there no mention or reference to the Blues Intergovernmental Council Final Socioeconomic Report 2022? Attachment #3.

Follow-up needed: It is expected that this report will be referenced throughout this draft document. We also need a written explanation as to why it is not included at this stage.

Item (2) Explain what defines sustainability. Does the Agency plan to sustain the current depressed economic conditions that have plagued the region for the last nearly 40 years or does the agency plan to develop management plans to improve those conditions through more. ex.1ractive/working lands models of management? Detailed explanation expected.

Item (3) Perhaps, the specific language would be better served as "develop contributions from Forest Service administered lands that promote social and economic vitality" (not sustainability).

Address a Changing Climate - Page 4.

Please define what a "Changing Climate" is specific to the Malheur, Wallowa-Whitman and Umatilla National Forests.

Maintain or Restore Aquatic Habitats and Ecosystem Integrity - Page 5

I agree ..... if you add "through a well-maintained roads infrastructure that allows for managed

working lands to meet Social and Economic Sustainability".

Maintain or Restore Ecosystem integrity and Reduce Wildfire Risks to Habitats and Communities- Page 5

Change or add .... " through a well-maintained roads infrastructure that allows for managed working lands to meet Social and Economic Sustainability."

It is to be noted of the seven listed items there is only one consideration given to Social and Economic in the Communities everywhere else it is Environmentally based. Why is that please explain in detail? This observation is very concerning.

Three additional concerns and needs for inclusion (1) Additional areas of discussion, (2) Access, Open v Closed Forests, and Designated Routes, and (3) Coordination.

Item (1) Why are there only seven (pages 3 and 4) areas of discussion in this document? I realize there is a statement that says more can be added.

Below are four categories of known resource areas identifying needed/necessary/must discuss and make new decision on specific areas. (1) 2012 Planning Rule, (2) Objectors to the 2018 failed Forest Plan Documents (reference Attachment #2 Washington Office memo, file code 1570 dated November 13, 2018, to Objector and/or Interested Person from Christopher B French, Reviewing Officer for the Chief), (3) Assessment conclusions, and (4) Blues Intergovernmental Council (BIC).

2012 Planning Rule: Forest Vegetation, Wilderness, Wild and Scenic Rivers, Climate Change,

Water Resources, Forest Health, Ecological, Social & Economic sustainability, Transparent Collaboration process that allows effective public participation, Ecosystem Restoration, Watershed Protection, Diversity of plant and animal communities, Multiple Use (Recreation, Timber, Grazing), Efficiency and Effectiveness, and Coordination and Cooperation beyond NFS Boundaries

Objectors: Access, Open Forests, Designated Routes, Public Participation, Social & Economic, Timber and Vegetation Management, Fish and Wildlife, Wilderness and other special designated areas back county special areas, Fire and Fuels Management, Plants, Range Management, Bighorn Sheep, Elk Security, Livestock Grazing, Local Government Cooperation and Coordination Consultation, Aquatic and Riparian Conservation.

Assessment: Ecosystems, Water, Climate, Soil, Air Quality, Aquatic Watershed and Riparian Ecosystem, Terrestrial Vegetation Ecosystem and Species, Fire, Carbon Stock, Terrestrial Wildlife Ecosystems and Species, Social & Economic Sustainability and Multiple Use, Cultural and Historical Resources and Uses, Areas of Tribal Importance, Social & Economic Benefits and Conditions, Rangelands and Grazing, Forest Management and Timber, Energy Resources Minerals and Geohazards, Existing Designated Areas, Scenery, Recreation Setting and Opportunities, Infrastructure, Land Status, Ownership and Uses.

Blues Intergovernmental Council (BIC): Access, Habitat, Wilderness, Public Use, Administrative Use, User Created Routes, Elk Security, Set Asides, Other Special Land Use Designations, Forest Health, Wildfire Management, Fire Suppression, Post Wildfire Salvage, Timber Harvest, Economic, Environmental and Social Values, Forest Resiliency, Livestock, grazing, fisheries, hydrology, Watersheds, Riparian Area, Plants, Animals, Vegetation, Soils

Follow-up needed: Incorporation of this critical infom1ation into this document to show the public the Agency is listening and willing to address their needs. Honestly, right now it feels like the Agency is not; it seems in these early stages of these new revisions the Agency can't be trusted to do even the most obvious things. Show the public what the FS Crosswalk is for these plans to assure them that the agency is not simply rolling over the 2018 Draft Forest Plans into these revisions.

Item (2) Access, Open v Closed Forest, and Designated Routes.

Specific to Access need to state in this document what the Agency plans are for Access and be truthful about your next steps to discuss the issue. Tell the truth and tell it like it is!
Specific to Open vs Closed Forest and Designated Routes include in this document an in-depth discussion regarding why designated routes and the long-tenn impacts that will have on the future public access to these National Forests.

Follow-up needed: It is expected you will add to the document and discuss in specific details.
Item (3) Coordination

NEPA requires these Draft Forest Plans be coordinated with local governments.
[bull] Have or will local governments be involved (County, Soil and Water, NRCS, others)?
[bull] Will their positions be considered. Will they be discussed, and analyzed?
[bull] If there are items needing to be resolved, i.e., inconsistencies between the local government and the federal agencies how and when would that occur?
[bull] What is the plan for discussion of any conflicts that cannot be resolved?
[bull] How will those discussions be documented in the final document?

Has an analysis been done, or will one be done to show the "impact this proposed action" will have on the productive use of our land and local economy? If not, why not?

Respectfully Submitted,

Frances M. Preston

Attachments (3)

1570 March 14, 2019, Memo to Glenn Casamassa, Regional Forester from Christopher B. French, Reviewing Officer for the Chief (Attachment # l - 1 page)

1570 November 13, 2018, Memo to Objector and/or Interested Person from Christopher B. French, Reviewing Officer for the Chief (Attachment #2 - 5 pages)

Blues IntergovemmentaJ Council Final Socioeconomic Report 2022 (Attachment #3 - 4 pages)