



July 23, 2025

Johnny Collin, District Ranger,
Umatilla National Forest
1415 Rose St.,
Walla Walla, WA 99362

Submitted electronically to <https://cara.fs2c.usda.gov/Public/CommentInput?Project=67275>

RE: Scoping Comments on the Mottet Vegetation Management Project

We are writing on behalf of Greater Hells Canyon Council ("GHCC") regarding the scoping period for the Mottet Vegetation Management Project ("project"). GHCC is a non-profit conservation organization based in Northeast Oregon with over 2,000 members and supporters. We were founded in 1967 (as Hells Canyon Preservation Council), and our mission is to connect, protect, and restore the wild lands, waters, native species and habitats of the Greater Hells Canyon Region, ensuring a legacy of healthy ecosystems for future generations.

The Mottet project area is of particular interest to our staff and membership for its ecological, recreational, and cultural values, especially because it:

- contains acres identified by ODFW as key aquatic and terrestrial habitat connectivity corridors (called Priority Wildlife Connectivity Areas);
- contains critical connectivity corridors between the Wenaha-Tucannon Wilderness, North Fork Umatilla Wilderness, and the Grande Ronde River;
- provides exceptional recreational opportunities and has substantial overlap with the Blue Mountains Trail, a long-distance hiking trail connecting Joseph to John Day;
- contains a number of cultural sites and ecological features important to the Confederated Tribes of the Umatilla Indian Reservation and the Nez Perce Tribe.

Comments on the proposed action:

Use of Emergency Determination, Inappropriate Purpose and Need

We are very concerned about the proposed scale and accelerated timeline of this project, especially considering the reduced opportunity for public engagement and the extremely limited details provided about the project. We urge the agency to complete a robust analysis with multiple alternatives and a full and complete series of public comment periods consistent with previous actions on the Umatilla.

While regulations may allow the project to technically qualify, a rushed process with such a limited scope is not the right fit for a landscape with such well-documented ecological, recreational, and cultural values (among others). This is already evident in the lack of recognition and consideration of bull trout critical habitat in the project area and possible impacts to the operations of the Lookingglass Fish Hatchery downstream (see comments from USFWS dated 7/21/25).

Use of emergency determination will prevent the agency from designing a project that adequately considers, and properly analyzes impacts to, ecological, recreational, and cultural values and may prevent the agency from meeting directives in the forest plan.





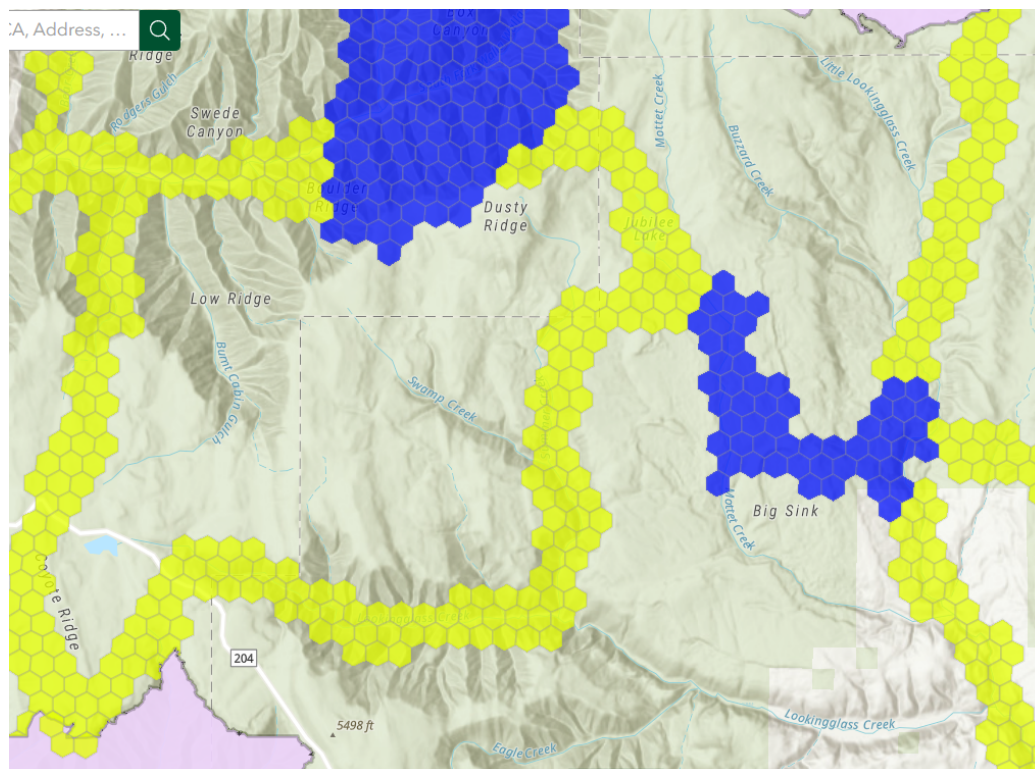
Wildlife analysis, impacts to wildlife habitat, and the ODFW Priority Wildlife Connectivity Areas

From a wildlife perspective, this project area is important to many consumptive and non-consumptive users alike. It offers excellent opportunities for wildlife watching and is part of a series of highly desirable hunting units that provide sought after and unique hunting opportunities.

The location of this project area is within a critical connectivity corridor in the Blues, and is highlighted in ODFW's Oregon Connectivity Assessment and Mapping Project (OCAMP), a *"multi-year, collaborative effort to analyze and map statewide wildlife habitat connectivity at fine resolutions for 54 species."*¹ The OCAMP identified places within the project area as Priority Wildlife Connectivity Areas, which represent *"an interconnected network representing the parts of the landscape with the highest overall value for facilitating wildlife movement in Oregon"*.

Proposed units in the project area substantially overlap both "regions" and "connectors". Regions were delineated from the combined top 1% of connectivity priorities across all 54 OCAMP surrogate species. Regions are large, contiguous areas and represent the highest-value habitat for facilitating species movement throughout the state. Connectors follow the optimal pathways between Regions, and represent the best available habitat for facilitating movement from Region to Region. Connectors may pass through high-quality habitat in intact, relatively undisturbed parts of the landscape, as well as the best remaining marginal habitat in developed or degraded areas.

It is not evident that impacts to wildlife and habitat connectivity were considered during the initial phase of project development. Please complete a robust analysis of impacts to wildlife habitat, connectivity, and corridors, and adjust boundaries of proposed units to better protect the integrity of wildlife habitat and corridors.



A screenshot of the region (blue) and connector Priority Wildlife Connectivity Areas in the project area²

¹ <https://oregonconservationstrategy.org/success-story/the-oregon-connectivity-assessment-and-mapping-project-ocamp/>

² <https://arcg.is/1yf0rH0>

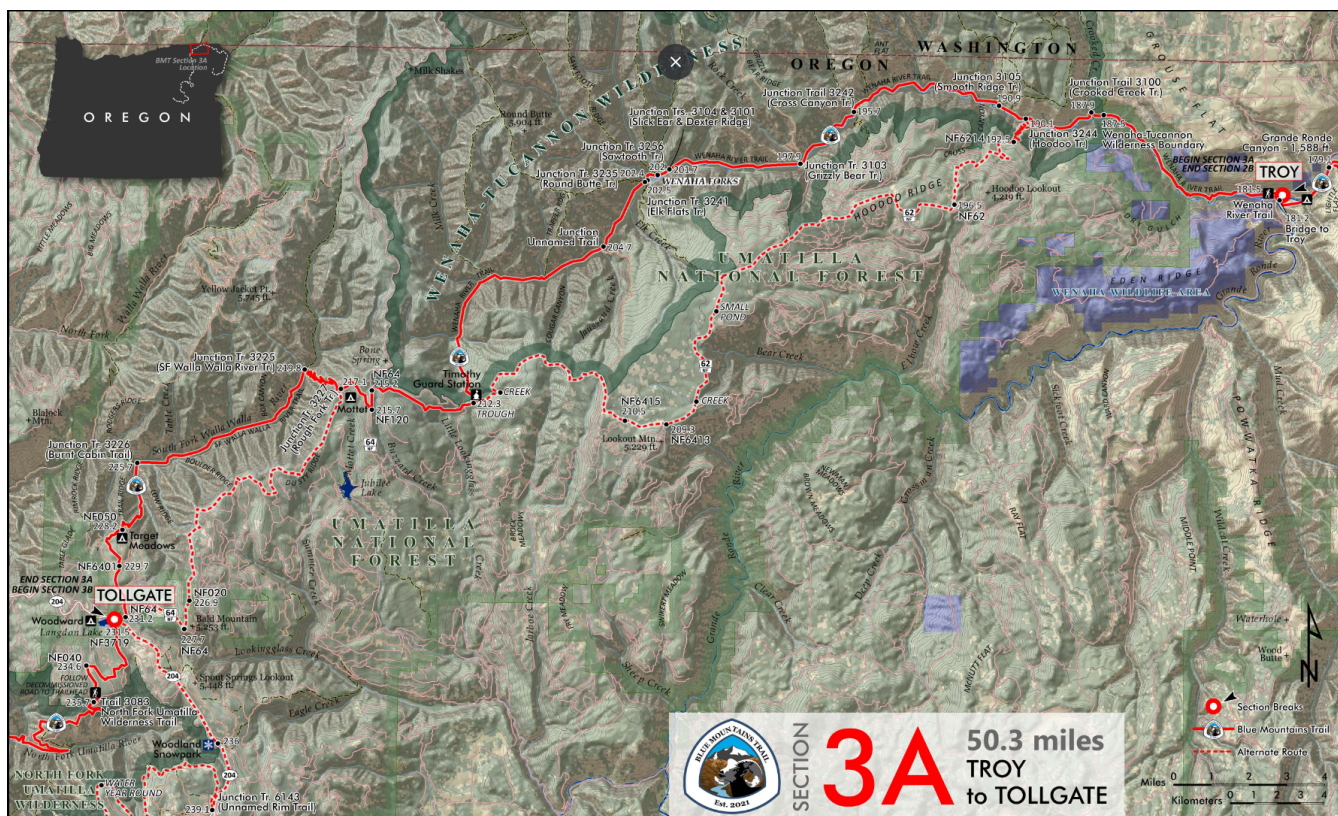




Possible negative impacts to recreational opportunity and the Blue Mountains Trail

The Blue Mountains Trail is a 530-mile long distance trail traversing public lands from Joseph to John Day, OR. The original idea for the “Blue Mountains Heritage Trail” was initiated by local horsepackers in the 1960s and debuted publicly in 2021 after many decades and iterations of the route. The trail attracts both long-distance enthusiasts as well as hikers with more limited time and ability. For folks who are interested in shorter excursions, we have provided shorter itineraries such as the Tollgate Jubilee Lake Loop³. The Blue Mountains Trail offers an opportunity to support recreational values regionally and connect visitors to both the local businesses in our rural communities and the unique landscapes within the project area.

It is not evident that impacts to recreational opportunity were considered during the initial phase of project development. The project area substantially overlaps with the Blue Mountains Trail as it exits the Wenaha-Tucannon Wilderness and continues towards Tollgate where hikers can resupply at Tollgate Crossing⁴. We have concerns that treatment impacts to the Jaussaud Corral Roadless Area would negatively affect the recreational experience for hikers, and that increased traffic from log trucks and associated support vehicles would have a clear and significant impact on the recreational experience both for hikers of the Blue Mountains Trail and for all other recreational users who enjoy this area throughout the year.





Please complete a robust analysis of impacts to recreational opportunity and create an action that limits negative impacts.

Impacts to Fisheries

The project area contains critical habitat for bull trout, supports other native fish species, and contains streams that support the Lookingglass Fish Hatchery which is co-managed by CTUIR and the Nez Perce Tribe. It is not evident that impacts to fisheries, aquatic habitat, or riparian areas were considered during the initial phase of project development. Please complete a robust analysis of impacts to those values and create an action that limits negative impacts.

Treatments in Inventoried Roadless Areas (IRAs)

The project proposes treatment in multiple Inventoried Roadless Areas including Jaussaud Corral and Lookingglass. The Inventoried Roadless Areas were created by the 2001 Roadless Rule to provide lasting protections for these important remaining wild areas.

As described in the Federal Register, "Inventoried roadless areas provide clean drinking water and function as biological strongholds for populations of threatened and endangered species. They provide large, relatively undisturbed landscapes that are important to biological diversity and the long-term survival of many at risk species." This undisturbed nature of IRAs is essential to their unique value for humanity and for the natural world. This is a legacy of their protection from commercial logging, associated road construction, soil disturbance, and other associated impacts.

Although the USDA has announced their intent to rescind the rule, the rulemaking has not yet started and the original rule remains in effect until rulemaking is complete. As a result, project planning must take the Roadless Rule into account and comply with its provisions. This means that any proposed activities within Inventoried Roadless Areas must avoid road construction and timber harvest unless they meet narrow exceptions defined in the rule. We request that the agency develop an action without any proposed treatments in the Inventoried Roadless Areas.

Thank you for your consideration of comments. Please let us know if you have any questions.

Sincerely,

Jamie Dawson

Jamie Dawson, Conservation Director
Greater Hells Canyon Council
PO Box 607, Enterprise, OR 97828
541-963-3950
jamie@hellscanyon.org

Brian Kelly

Brian Kelly, Senior Advisor
Greater Hells Canyon Council
PO Box 607, Enterprise, OR 97828
541-963-3950
brian@hellscanyon.org

