

September 18, 2025

U.S. Department of Agriculture, USDA Forest Service
2025 Preliminary Draft Proposed Land Management Plan for Malheur, Umatilla and Wallowa-Whitman National Forests
Forest Supervisors Office, 236 pp

Re: Comments on the Preliminary Draft Proposed Land Management Plan for Malheur, Umatilla and Wallowa-Whitman National Forests (Draft Plan) as pertaining to **Recreation**

Dear Sir:

Enclosed are my comments on the Preliminary Draft Proposed Land Management Plan for Malheur, Umatilla and Wallowa-Whitman National Forests (Draft Plan) as they concern Recreation.

I am very interested in what the Forest Service is planning for the transportation system and recreation. I also tried to read other sections, but found the document very difficult to read and to understand. This Draft Plan clearly does not comply with the *Plain Writing Act of 2010*. The Plain Writing Act of 2010 requires all government documents to be clear and readable by the general public. This means writing in a clear, concise, and well-organized manner, making information easily understandable and usable by the public. The Draft Plan fails to meet the intent of this law.

I kept seeing hundreds of abbreviations, like FW-ERCDIS-DC and MA2B-RNA-DC and it goes on and on. I did try to read the part on page 64, under desired conditions for Local Communities, but all I could see was things like I should refer to FW-WTR-DC, FW-AQ-DC, FW-TRI-DC, FW-REC, and MAIA-DWA DCs. These Plan Component Codes, or abbreviations, which continue throughout the document, may mean something to the Bureaucrats, but they are distracting, and mean nothing to the ordinary reader.

When these abbreviations mean something that is important to the document, each should be written out in English. In addition, the reader should not have to thumb through the document to find out the meaning of each of these abbreviations. Furthermore, the document mentions the appendixes and how the reader needs to refer to these. If there is something important to the subject being discussed, that information should be presented and be written in plain English.

The Draft Plan states the reason the Forest Service needs a Revised Forest Plan is because the Forest has changed a lot. It states *" Since the current 1990 Plans were implemented more than 30 years ago, there have been; new laws, regulations and policies changes in population, public values, and community needs bigger and more devastating fires new invasives and outbreaks that the previous plans did not anticipate, such as the mountain pine beetles epidemic changes and increases in activities and uses advances in science and information that need to be incorporated into the revised Land Management Plan.*

Besides the fact that this is a hard to read, is a run-on sentence, and is in need of punctuation, it also is not factual.

Really, not so much has changed in Baker and Grant Counties. There are no new laws affecting the Forest Service, except for the rule that global warming and the effects of greenhouse gasses is no longer an issue and must be deleted from land use plans, and there also may no longer be roadless inventoried in Land Use Plans.

There really are no changes in population numbers. Timber and mill workers retired and still live in Baker County, while their kids moved away to areas where they could find jobs. Public values and community needs are still the same. The Draft Plan states a new Plan is needed because the 1990 Plan did not anticipate catastrophic fires, but that is not the fault of the Plan, it is the fault of the Forest Service for not logging and thinning as the 1990 Plan advised they do.

Yes, the population is getting older, and many of us enjoy the Forest via ATVs. The 1990 Forest Plan was user friendly, and unless resource damage was taking place, roads and trails were to be left open, improved or moved if there was a better location. That 1990 Plan states, *"The Forest offers a wide range of outdoor recreation opportunities varying from primitive hiking and horseback riding experiences within wilderness and the Hells Canyon National Recreation Area to the relatively developed atmosphere found at Anthony Lakes, Phillips Lake and a number of other recreation sites Although recreation is concentrated in the late spring, summer and fall when most of the Forest is accessible by wheeled vehicle, opportunities for winter recreation are abundant for those interested in downhill or cross-country skiing, snowshoeing or snowmobiling"*

It is interesting to note, that the 1990 Forest Plan gave guidance through 2030. The 1990 Plan stated *"The Forest has a general surplus of supply over existing and projected recreation demand. It will maintain the surplus through 2030 though changes will occur in recreation use".*

Today, as the 1990 Plan foresaw, there still are a surplus of roads and trails. This is a good thing, and this situation should be maintained. Use of the roads and trails continues to be the same as we saw in 1990, with the change that more ATVs and side by sides are using the roads and trails.

The 1990 Forest Plan under TRANSPORTATION SYSTEM stated the Goal (same as Desired Condition in the Draft Plan) was *"To provide safe, efficient, environmentally sound access for the movement of people and materials involved in the use and management of the National Forest lands"*. This is short and easy to understand.

In contrast, the Draft Plan states the following: 01. The forest transportation system of roads, trails, and airfields provides safe and efficient public, private inholding, tribal, and administrative access for recreation, special uses, forest resource management, fire management, and treaty related activities. The transportation system and its use support ecological, social, and economic sustainability. **Transportation infrastructure and its use are managed to avoid or mitigate undesired effects to ecological integrity and diversity and on resources including threatened and endangered species, species of conservation concern, heritage and cultural sites, watersheds, water quality and aquatic species.**

I looked up *"ecological integrity,"* since I had no idea what the Draft Plan was talking about, and found out the following; *"It essentially means an ecosystem is whole, unimpaired, and able to function naturally"*. So I am asking, does this mean that the mitigation would be to have no roads? If this is what the Draft Plan means, it should be written out in plain English.

This section goes on and on. It talks about *"reasonable access"* but what is reasonable to the Forest Service may not be reasonable to the public (i.e the public should walk instead of using an ATV or pick-up). A definition of *"reasonable access"* is needed.

So much information just to describe the goal for the transportation program. And even with all this verbiage, 02 neglected to include mining in how the Forest Service plans to provide *"reasonable"* access.

Under the Transportation section on page 65, the Draft Plan refers to the national forest's Transportation Atlas. Please provide me a copy of that Atlas.

On page 66, again I see that the Draft Plan advises that all existing roads and trails that cross *"sensitive areas or affect ecological (natural process areas) or cultural resources may require additional mitigation."* Is one of those mitigations to close the road? If so, the Draft Plan should come right out and say this in plain English.

The Recreation section on page 67 lost me right off with RECDEV, RECDID sand DECBCA. I did take the time to look up Appendix E, which is about Recreation Opportunity areas, but it too was confusing, and I could not tell what it means for the future of roads and trails.

I was told that the Draft Plan proposed increasing the buffer along dry stream from 50 feet to 150 feet. I found this on page 111, but there is no mention of this change in the Recreation section and how this change would affect existing roads and trails. The current 50-foot buffers

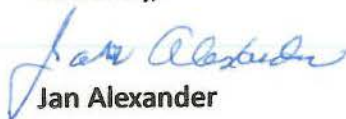
do not even have riparian vegetation, so increasing the width to 150 feet makes absolutely no sense if protection of a sensitive area is the goal. There is no environmental reason to increase these buffers by an additional 100 feet and preclude any activity within this additional 100 feet. Also, whatever in the world "*a distance equal to the height of two site potential trees*" is, this is not clear and is completely confusing. And adding new Research Natural Areas is not needed. These are "*designated in perpetuity*" according to page 101, and once designated, they will never go away.

The 1990 Land Use Plan is clear and concise and easy to read and understand. I suggest the Draft Plan include some of the Standards and Guidelines from the 1990 Forest Plan.

- 1) Plan and develop the transportation system to serve long-term multiple resource needs rather than short-term individual project proposals.
- 2) Design, construct, operate and maintain roads and trails of the Forest transportation system based on resource objectives and intended uses, considering safety, total cost of transportation, and impacts on the land.
- 3) Manage road and trail uses to protect resources, accommodate or restrict conflicting uses, provide reasonable safety, and prevent damage to the facilities.
- 4) Encourage access to historical dispersed recreation sites by standard vehicles.
- 5) Manage traffic as needed due to structural limitations of the road or limitations imposed by other resources, such as wildlife or recreation.
- 6) Construct and maintain trails to provide a recreation experience as well as a transportation route.
- 7) Provide trails to meet specific management objectives and to achieve prescribed difficulty levels.
- 8) Emphasize trail retention, maintenance, and improvement (and additions where there is a valid need).
- 9) Evaluate the need for trails and perpetuate, or move to a new location, those trails which will serve a continuing purpose and which appear likely to be used.

The Draft Plan must be withdrawn and rewritten so it is in compliance with the Plain Writing Act of 2010. When I can better understand what the Draft Plan is saying, I will be able to make additional comments.

Sincerely,



Jan Alexander

Concerned Citizen and National Forest User.