

My wife and I have been in and around the USFS for more than 50 years. I was on an engine crew and fought fires in Oregon and California. One of our sons is a USFS fire fighter. We have watched the decline of the Agency through the years. We understand the pressures that District Rangers face, budgets, politics, etc. To be honest, I've come to the conclusion that the Wallowa Whitman Forest and especially the "North Zone" forest is the bastard stepchild of Region 6. There are many, many changes that need to happen in order to turn the Agency around. I remember being told by the District Silviculturist in 1990 that the forest had at least twice as many trees per acre than the land would support. The density has only increased since then. This is all to say, going back to 1990 isn't going to solve anything. We have a long way to go, but now is the time to start. I don't think this document is that start.

These powerful and insightful observations from Royal Burnett on September 5, 2023 still ring true, more so now than before.

"I have in my library a copy of the USDA Regulations and Instructions of the Use of the National Forest Reserves issued by the Secretary of Agriculture to take effect July 1, 1905.

It says: "The Forest Reserves are for the purpose of preserving a perpetual supply of timber for home industries, preventing the destruction of the forest cover which regulates the flow of streams and protecting local residents from unfair competition in the use of forest and range".

It goes on to say on page 12 that a force of men shall be organized to serve the public interests.... "This force has 3 chief duties: to protect the reserves from fire, to assist the people in their use and to see that they are properly used. "

And on page 65 ; "Officers of the Forest Service, especially Forest Rangers have no duty more important than protecting the preserves from forest fires."

Its clear to me that one of the driving forces for the creation of the USFS (and other Land Management Agencies) is to protect our natural resources from exploitation and destruction by natural means, especially fire.

The USFS did this job in an exemplary manner through most of the 20th century... They pioneered the concept of rapid initial attack... they hired and trained hand crews...they developed the Smokejumper program and HotShot Crews... pioneered the use of air tankers and helitack...built the first wildland fire engines...The USFS became the lead

Agency for fire in the West...and set the tone for the other LMA's.

The Legislature passed the Wilderness Act in 1964... setting aside portions of USFS land as Wilderness where no motorized traffic was permitted... this was interpreted to mean no motorized tools (including chain saws) could be used to fight fire inside a designated Wilderness without the Forest Supervisor approval. Since there was no provision of removing dead vegetation the Wilderness Areas became lightning magnet fire traps.

In the 1980's the enviros got involved. Through the Environmental Protection Agency they lobbied for protected status for the Northern Spotted Owl and various other species . The private logging companies with vast holdings were able to adapt to the new rules, but USFS capitulated in the wake of lawsuits and shut down logging in NorCal forests. Now we grew more fuel than we harvested.

Without timber sales, the main source of revenue for the National Forest system dried up. Roads were no longer maintained...huge tracts of land were gated off... since trees were no longer a marketable commodity, roadless areas were created. Fuels accumulated at an even faster pace.”

Wildlife:

The proposed plan moves away from some older numeric road-density and elk habitat-effectiveness rules.

That may sound like a win for access. It is not that simple.

Removing an old number does not remove the agency's ability to restrict access. The DEIS still discusses wildlife disturbance, route patterns, frequency of motorized use, distance from routes, seasonal use, habitat effectiveness, elk security, Species of Conservation Concern, and project-level mitigation.

Those broader concepts may give future decision-makers more discretion than a number the public can see and measure.

Wildlife direction can later support seasonal closures, route relocation, road storage or decommissioning, timing restrictions, maintenance limits, buffers, and other access changes.

The fix is a clear crosswalk showing every old metric, what replaces it, how the replacement will be applied, which existing routes and uses may be affected, and how wildlife-based access changes will be monitored and reported.

Process:

The public is being asked to comment on alternatives that were years in the making.

We still need a clear record showing who helped shape them.

What role did the Blues Intergovernmental Council play? How were Eastern Oregon University socioeconomic products used? What influence did Wallowa Resources, REV, county participants, cooperating agencies, or other organized groups have on the alternatives and the preferred narrative?

These are not paperwork questions. If non-agency participants helped frame the alternatives or the socioeconomic story, the public should be able to see their recommendations, authority, meetings, products, and the agency's response.

The fix is to publish participant rosters, MOUs, meeting materials, recommendations, advisory-role records, socioeconomic products, and a clear explanation of what the Forest Service relied upon.

NEPA:

A headline that I saw recently:

Thirty-five years after the feds slashed logging to save the spotted owl, researchers find the bird approaching functional extinction in parts of Oregon and Washington

The collapse of the Pacific Northwest timber economy began in the early- to mid-1980s. Foremost among the proximate causes was a seized-up national economy featuring mortgage interest rates between 12 - 18% between 1980 and 1982. People weren't building houses (in 1981, there were only 1.1 million housing starts nationally, the lowest in 35 years) so people didn't need lumber and didn't need people harvesting trees and turning them into lumber.

Between 1979 and 1982, forest sector employment in Oregon and Washington declined by about 39,000 jobs, or 27%, according to the [U.S. Forest Service](#). A lot of that pain was felt in small towns all over Oregon, especially Eastern Oregon, where alternatives to timber jobs were few.

The decisive blow would come from the supply side, as first judges and then the President of the United States decided to hobble the rural economy of an entire region to save an owl

we've now learned is "functionally extinct" despite the socioeconomic harm perpetrated in its name.

The clearcutting of timber jobs and the evisceration of the economy that sustained families and towns throughout the Pacific Northwest did not save the northern spotted owl. That timid, reclusive and apparently fragile bird has continued its march toward extinction despite the enormous pain and societal upheaval inflicted by the federal government in its name.

This is maddening. It is inexcusable. It is a scandal of regional and multi-generational effect. Those who claimed they knew what they did not know about how to save the spotted owl are mostly gone, now. Towns are mired in perpetual economic and social depression imposed on taxpayers by the government they help fund.

Government is a blunt instrument often wielded to achieve specific results. When its policies do things policymakers did not intend, we call those things unintended consequences. In the case of logging restrictions to save the northern spotted owl, the policies missed the mark entirely, leaving an owl more imperiled than ever and a smoking crater of collateral damage visible throughout the Blue Mountains.

Conclusion:

The plan makes broad promises about active management, access, grazing, timber, recreation, wildlife, and community sustainability.

How will the public know whether those promises are kept?

A monitoring program that counts only broad agency activity will not tell us whether public access is reduced, grazing remains usable, timber reaches local mills, firewood areas remain available, or local families bear higher costs.

The Forest Service should track road and trail miles by public-use status, every closure or restriction and the plan component used to justify it, actual AUMs used, reasons for non-use, timber offered and delivered, local jobs and contracts, firewood access, route distance, mining and material access, and effects on older and disabled users.

Monitoring also needs baselines, public reporting, thresholds, and a required response when conditions move the wrong direction. Otherwise, the agency can report activity while local access and multiple use continue slipping away piece by piece.

The fix is an annual public scorecard that compares promises with results and requires corrective action when the plan is not delivering.

The greatest access problem in this plan may not appear in one sentence or on one map.

It appears when the layers begin stacking.

Recreation Opportunity Spectrum settings. Scenic integrity. Wildlife and Species of Conservation Concern direction. Riparian Management Areas. Wild and Scenic River corridors. Roadless areas. Recommended wilderness. Management areas. Transportation language.

No single component has to say “close this road” today.

One layer can limit the desired setting. Another can discourage roads or motorized use. Another can require wildlife mitigation. Another can affect maintenance, reconstruction, vegetation work, grazing infrastructure, or dispersed access.

When several layers overlap the same place, the result can be an access restriction or management limit that was never plainly disclosed in any one section of the DEIS.

That is why “travel management happens later” does not answer the concern. The plan is establishing the sideboards now.

The fix is a cumulative-sideboard analysis showing how every major plan layer overlaps existing roads, trails, working lands, family-use areas, and tribal and non-tribal subsistence uses. The plan must include clear language protecting existing public access from piece-by-piece restrictions.

In short, rather than trying to short cut a plan that is more of the same, start from scratch, learn from the past, learn from your neighbors, and create a document that everyone can understand and plainly explains the plan for our forest.

The time for bureaucratic gobildy gook, unintelligent legalese and generalities that mean nothing is past. It is time for the USFS to speak to us, the people that pay their salaries, and tell us exactly what they have planned. Or, maybe it’s time for them to listen to the people and what they want.

