

Notes –

1) Am I commenting on the Blue Mountains Forest Plan Revision or individual forest plan revisions?

“For the purposes of commenting on the draft forest plans, the three forest plans have been consolidated into one document. For the most part the plans for each national forest have the same plan components, where there are differences these distinctions are identified.” **Pg 1 – yellow highlight**

2) What is the restoration threshold you are attempting to get to? Pre-European settlement, pre-tribal settlement?

Pg 1 red highlight

3) What are the needs of “future generations” when can I find the survey work for determining the needs of future generations? **Pg 1 yellow highlight**

4) “The National Environmental Policy Act (NEPA) of 1969 requires that all major Federal actions significantly affecting the human environment be analyzed, and the consequences to the quality of the human environment from proposed management actions are to be considered.” **Pg 2 yellow highlight**

5) Forest plan management area and forest wide direction are the “zoning ordinances” under which future decisions are made. Forest plan approval establishes multiple-use goals, desired conditions, and objectives for the planning unit. **Pg 3 red highlight**

6) What are the two wild and scenic rivers suitability analysis, for which rivers? **Pg 3 yellow highlight**

7) The second level of planning involves the analysis and implementation of management practices designed to achieve the goals, desired conditions, and objectives of the forest plan. **Pg 3 yellow highlight**

8) The designation of routes, which include both roads and trails, or areas for motor vehicle travel is not being made during this forest plan revision. Pg 4 yellow highlight – if the forest plan does not designate areas for motorized use, why does sections XXXXXXXX discuss a desired condition of non-motorized use? Is this not designating a future condition within the document? **Pg 4 yellow highlight.**

- 9) Why are effects of the alternative on local communities (the human environment) not the primary decision making criteria determining which alternative ultimately will be selected? What criteria was used to develop the decision making criteria, who was part of that and when was that decision made?

“Decision Criteria

Decision criteria were identified by the forest supervisors for the Blue Mountains national forests and approved by the regional forester. These criteria will be used to evaluate the alternatives and determine which alternative ultimately will be selected:

- Meeting all applicable laws and regulations and be aligned with Forest Service policy
- Determining the balance between meeting the purpose and need with addressing the significant issues raised during the NEPA process
- Providing a mix of benefits to address the needs for change by:
 - ◆ leading to more resilient and sustainable terrestrial ecosystems
 - ◆ Accelerating improvement of watershed and aquatic/riparian conditions
 - ◆ Restoring and maintaining scenery, cultural and recreation resources, treaty resources, and wildland urban interface
- Minimizing conflicts between revised forest plans and travel management decisions
- Maintaining or enhance biological diversity and the long-term health of the national forests
- Contributing to economic and social needs of people, cultures, and communities **“pg 4 yellow highlight**

10) If desired condition paints a picture of what “we” desire the forests to look like and the goods and services desire them to supply, and if we say we expect to have a continued open forest system does that not go against what “we” desire. **Pg 5 yellow highlight.**

11) Social and economic expectations does not reflect the affect parties’ expectations, but is only a general statement about conflict. **Pg 15 yellow highlight**

12) Forest plan references motorized and non-motorized use conflicts, is not supported by the Travel Use Study. Pg 15 yellow highlight

13) Transportation system talks about “expanding road networks”. How much have roads networks increased since the current forest plan was put into place. **Pg 16 yellow highlight**

14) Invasive weed spread caused by roads **pg 16 yellow highlight**

15) Roads render wildlife areas unusable **pg 17 yellow highlight**

16) Roads are degrading watershed and aquatic habitats (watershed and aquatic habitats), has netmap already been used to develop preliminary information for the Forest Plan Revision. **pg 18 yellow highlight**

17) You cannot be using ‘assumption and potential effects’ to make social decision that affect basic human rights to engage traditional uses. Climate change discussion **pg 19 yellow highlight caption**

18) Who is the largest working “partner” you have to work with? Pg 20 yellow highlight (the public)

19) Need to identify “key watersheds” **pg 22 yellow highlight**

20) Road densities affecting fish habitat **pg 28 yellow highlight**

- 21) “Native fish species have access to historically occupied aquatic habitats and connectivity between habitats allows for the interaction of local populations.” A way to justify pulling culverts and closing roads. **Pg 29 yellow highlight.**
- 22) Managing public lands for “pre-settlement” vegetative types, is not realistic in a nation that is based on a large population that currently affects vegetative communities. **Pg 29 yellow highlight.**
- 23) How has urban development affected the lands managed by the USFS.
- 24) Anthropogenic impacts to the Blue Mountains should not be looked at as a whole hearted negative impact, as if humans are intentionally destroying the ecology of the area, but that the ecology of the area is evolving to adapt to the increased population and differing utilization regimes of the area. Pg 29/30 yellow highlight. Anthropogenic (Chiefly of environmental pollution and pollutants) originating in human activity. – "Anthropogenic emissions of sulfur dioxide"**
- 25) What are the “Within the planning area, there are nine species (one mammal, two plants, one snail, and five fishes) listed under the Endangered Species Act by either the U.S. Fish and Wildlife Service or the National Marine Fisheries Service” **pg 30 yellow highlight**
- 26) What is a “regional forester sensitive species, and where does the authority come for such designation, and what regulatory authority does that carry, policy from where that authority comes from and corrective actions delegated to affect change. **Pg 30 yellow highlight**
- 27) Disturbance process pg 32/33 yellow highlight – paint human activity in a negative light and natural processes a positive action. Needs to be equal time given to how human interaction can be made a positive action and not treated as a whole heartedly negative factor to the ecology of the area.
- 28) How are “the soils” being negatively affected by OHV use? less than 3/1000 of the area is directly affected by any motorized use, and of that a considerable less area is negatively impacted by motorized use. Erosion is not a “soil quality” issue, and as such should not be discussed as a negative factor in this plan revision, it’s a natural process. Pg 43 yellow highlight existing cond. Motorized use is identified as a negative factor.**
- 29) “Surface erosion rates and sediment deposition are within the natural range of variability for each biophysical setting.” Is this using the “landfire” model? Which vegetative type do you compute the erosion rates and sediment for, post historic fire, climax community or mid-serial, after a natural event (disease, microburst, etc).
- 30) **“Existing Condition:** The primary designated beneficial use of water on National Forest System lands in the Blue Mountains is for cold-water fish habitat.” **Pg 44 yellow highlight**
- 31) “Issues of landscape fragmentation and patch connectivity are a concern in conservation biology (Forman and Godron 1986) – statement of opinion, not of scientific fact. Hann et al. (1998) found that when land use, ecosystem health, and species diversity are out of balance with inherent disturbance processes and biophysical capabilities, the landscape ecosystem tends toward unbalance. Hemstrom et al. (2001) concluded that past types and levels of human use have caused extensive changes and have run counter to the historical ecological conditions.” Pg 44 yellow highlight – Why is the Forest Plan so hostile towards human use, and attempts to manage towards a “historical ecological condition” where human population densities were substantially lower. The USFS should reevaluate the plan revision to manage forest with current population densisties and uses, and manage for a sustainable use system that deals in the reality of what is, not what was.**
- 32) Decrease in Large Snags is being attributed to “roaded areas”, assumption would be they are going after firewood cutters. Is this based on actual inventories or DecAID outputs? **Pg 48 yellow highlight**
- 33) Pages 48 & 49 go after the firewood cutters.

- 34) Social well-being section speaks more nature's well-being than social well-being.
- 35) **Subsistence use of the National Forests should and has to be its own section. It is primary to the statement made on page two, but is not given its proper place in the plan, this is a must have item for the plan.**
- 36) "A diverse and complex set of values that contribute to one's social well-being can be tied to natural resources-related work, including restoration, ranching, and recreation" **pg 50 yellow highlight, USFS must include subsistence in what contributes to social well-being**
- 37) These values may include viewing or hunting wildlife, being able to do natural resource-related work, knowing that restoration efforts are supporting fish populations, and being part of an environment where human traditions and cultures can be maintained. Pg 50 yellow highlight – **the sentence should read "knowing restoration efforts are supporting Human populations, and being part of an ecology where natural resources can be maintained. – You are not meeting the intent of your own plan, quoted from pg 2 – "The National Environmental Policy Act (NEPA) of 1969 requires that all major Federal actions significantly affecting the human environment be analyzed, and the consequences to the quality of the human environment from proposed management actions are to be considered." The primary function is to protect the HUMAN ENVIRONMENT, not the FISHES ENVIRONMENT.**
- 38) A full break down of all areas found in each Scenic class need to be identified so that the public can comment on the appropriateness of their designated Scenic Class, what is Highly Valued to one person is not Highly valued to another. **Pg 52 yellow highlight**
- 39) The plan identifies reducing road densities while identifying that 80% of the users frequently use motor vehicles to access the national forest. Also the plan assumes a higher disproportionate use of adult aged people 18 years and older, while minimizing youth usage, did the surveyors question all respondents, or simply those able to answer the questions or those they came into contact with? **Pg 54 yellow highlight**
- 40) Unavailable funds to maintain public resources is not a justifiable reason, nor factor when it comes to reduction of services or infrastructure available for the public. Currently the three forest of the Blue Mountains spends 50 million dollars annually in wages, and spends over 200,000 annually in bonuses and non-cash awards to staff. When the peoples accessibility to their lands is impacted by staff bonuses corrective actions need to take place to make sure the public's needs are met before cash awards are given to staff. **Pg 54 red highlight.**
- 41) Existing Condition fails to state dissatisfaction of the public in wilderness visitors on road conditions. **Pg 54 yellow highlight.**
- 42) What determines "heavy use" of a dispersed camping area? **Pg 56 yellow highlight**
- 43) Dispersed Recreation section – What maintenance needs to take place at a dispersed camp site? And are we going to start contracting out availability of sites, needs to be reworded - "Partnerships with private providers are encouraged and sustained for specialty services, such as big game outfitting and guiding, horseback riding, shuttle services, and bicycle touring. Some special use permits, such as for members only events and limited entry contests, are retained and provide for recreation opportunities not available to the general public. Scenic integrity is commensurate with the inventoried scenic class." **Pg 57 yellow highlight**

- 44) Reference to the Starkey Experimental Forest and Range area should be stricken from the plan as the forest does not fully support an intact seasonal use pattern of elk but keeps them in a late spring/summer/early fall area and disallows winter migration to low elevation wintering grounds. Heavy winter feeding and supplementation, along with manipulated motorized use patterns give false data and false positive results that cannot be used as a means to manage people rights to access their public lands. **Pg 58 yellow highlight**
- 45) Road densities relative to elk forage areas, and their use of those areas is not supported by Traditional Cultural Knowledge (TCK) of the local populations, and any such reference to negative impacts to elk habitat via open roads is simply a statement of opinion and not supported by the TCK of the local populace. Also, TCK supports that elk foraging areas are not only not minimized or totally lost in areas with higher road densities, but to the contrary foraging areas are increased in such areas due to the higher management levels, active landscape management leading to improved forage condition and decreased predation rates from improved predator control. Existing condition needs to be rewritten to reflect TCK from local communities, and less dependent on highly manipulated modeling systems and flawed studies that have inherent confounding factors that skew data and decision making process to justify an agency and personal agendas to see fewer motorized users in the forest. More focus should be given to how to develop and increase elk wintering habitat through active landscape level management and less on decreasing road densities and access to the public. **Pg 58 and 59 yellow highlight.**
- 46) Attaining the Desired Condition depends to heavily on reduction or elimination of motorized access and should focus more on increasing winter, summer and fall foraging areas. "Elk Security" areas have long been used as a means to justify restricting and eliminating motorized access, this is not an acceptable model for the people of Eastern Oregon and must be struck from the Blue Mountains Forest Plan Revision and reevaluated to improve the true issue of degraded foraging areas. **Pg 59 red highlight "desired condition"**
- 47) The **Existing Condition under 2.6 Cultural Resources** fails to give proper credit for local residents Traditional Cultural Properties, such as hunting areas, camping gathering sites, burial grounds, and general use areas. These areas need to be identified and uses protected for current and future generations as stated in USFS guidance. **Pg 60 yellow highlight**
- 48) **Section 2.7 Roads and Trails Access pg 60 - 63**
- 49) Areas will not be available for appropriate use under this forest plan revision with desired reductions of motorized use identified through the plan. The entire plan should be reevaluated on how to protect, maintain and enhance access to Traditional Cultural Places, instead of identifying needs to further restrict and eliminate access to those areas. **Desired Condition pg 60 red highlight.**
- 50) The Forest Plan Revision notes resource impacts, conflicts between user groups and safety concerns, but does not give the specific incidences that occurred to cause them to reference those issues. If the USFS cannot show a preponderance of evidence that these are major social issue, it should not be needed to become a major policy change in how the forest handles current forest use. **This should be stricken from the plan as it is supported only in opinion and not in statistical fact for the Blue Mountains. Pg 61 yellow highlight.**
- 51) Funding levels should not be mentioned in this plan, as that is a direct reflection of a lack of request of funding by the USFS, and is not contributable to anything the local residents have done to affect funding levels.

52) "The average allocated road maintenance budget from 2008 to 2010 is approximately 1.3 million dollars for the three national forests. The annual shortfall is approximately 200,000 dollars, which adds to an already substantial deferred maintenance backlog." The average bonus given out on the three forest is 175,000 dollars per year, there is no shortfall in funds, simply a shortfall in prioritizing allocation of monies. **Pg 61 red highlight**

53) Motorized use and needed road inventories was not supposed to be dictated by artificial road densities, per Forest Supervisor John Laurence March 1st visit with Forest Access For All monthly board meeting. Supervisor Laurence assured the attendees that a more adaptive management style would be used to address motorized access and that it could be entirely possible that areas with higher road densities would be acceptable. The desired condition shows a desire to move the Blue Mountains to a threshold of 1 to 1.5 miles or road per sq mile with no public motorized access off of designated routes. This Desired Condition is not acceptable to the people of Northeastern Oregon and we do not give out consent to see our lands and access managed this way.

54) The Desired Condition should read –

Road systems are safe and responsive to public needs and desires, are affordable and efficiently managed, have minimal effect on aquatic and terrestrial systems. Funding should be made available to protect the Health, Welfare and Safety of the local population in regards to maintaining open access to national forestlands, as well as address resource concerns. Current road density are maintained to avoid disrupting social well-being of the local residents and causing resource concerns. Administrative use supports Forest Service management objectives. Conflicts between user groups are minimized, and users take on appropriate challenges and risks.

Roads needed for the long term are identified and investments are made to minimize their effect on the ecosystem and to meet the mobility requirements anticipated in the future.

A system of roads and trails remains intact to fully facilitate Traditional Cultural Uses and to protect the Human Environment of Eastern Oregon. Motor vehicle use is fully accepted as a compatible use in the Blue Mountains and has a Historic and Cultural tie to the local residents living there, that use will be protected for current and future generations through a strong commitment to active management of the resource base and addressing resource concerns as they develop.

Snowmobile use is managed to provide historic use's and respect local practices of use.

Opportunities for trails where motor vehicle use is prohibited are emphasized in wilderness areas.

Trails where motor vehicle use is prohibited provide a range of difficulty for a variety of recreational experiences, including mechanized transportation (except in wilderness areas), foot travel, and pack or riding stock. Trails are located to provide experiences in different ecosystem types and scenic settings and do not contribute to resource damage.

Rights-of-way and easements provide adequate and legal access to National Forest System lands, RS-2477 designated routes will have priority and Jurisdiction for county, state, and local access roads is appropriate to assure management objectives are met for both private and state lands.

The need for tribal access to traditional sites is acknowledged and supported.

The desired condition is to reduce road-related sedimentation, while protecting historic and traditional use of local communities and individuals. The desired condition for open motor vehicle route is the current density to facilitate active adaptive management and protect the health, welfare and safety of local communities. In addition, all cross-country over-the-snow vehicle travel is allowed to local residence to the degree that resource damage is not happening.

The desired condition for open motor vehicle routes is to remain the same and protect local resident's rights to access an open forest system.

- 55) Community Resilience section 2.11 pg 65.** The proposed action currently identifies a desired condition to severely reduce motorized use on national forests. This will make remote communities less resilient to changing ecological, social and economic conditions. Fewer means to access public lands decrease accessibility to needed resources and infrastructure in rural communities, further limiting their ability to access resources they need to survive. The Forest Service must reevaluate current proposals in the proposed action to make sure they are in line with their primary mission of protecting the human environment, as noted on pg 2.
- 56)** Community Resilience section does not mention that national forest supply supplemental heating sources and food for local residents that allow them to be resilient during stressing events.
- 57)** This is not a true statement - Many of the factors that contribute to community resiliency are beyond the control of communities, counties, states, and the Federal government, including the Forest Service. This limits the ability to improve community resiliency through the management of the national forests. The USFS has control over the local resident's ability to access resources to increase their resiliency, it is fully in the ability of the agency to allow this access and the agency is not community's full access to resources causing them to be less resilient.
- 58)** Local communities cannot be resilient, nor maintain resiliency if they are not allowed to access resources in a timely manner and are disallowed the availability of resources to mitigate negative ecological, social, and economic situations. The Forest service must reevaluate this plan and develop a revision that places Social Well-being and resiliency at the forefront of it's planning goals, not secondary to environmental "restoration."
- 59)** **"These** national forests still contribute in vital ways to community resilience by providing jobs and quality of life." Needs to state "providing jobs, subsistence, and quality of life. **Pg 67 yellow highlight**
- 60)** Availability of and retrieval of Goods and Services 3.3 - 3.3.1 Forest Products, 3.3.2 Livestock Grazing, 3.3.3 Special Uses, 3.3.4 Mineral and Geological Resources, and 3.3.5 Water Use will be severely reduced and eliminated in given areas with the strict restrictions placed on the local residents of the area. The forest service should take a harder look at how to minimize reductions in delivering Goods and Services to the local residents and allow for them to fully capture those resources to be as resilient as they can be. Predictability is not the only metric that people of Eastern Oregon need to maintain and grow economically, as predictability of limited access does not grow a thriving economy. The proposed action needs a spell out clearly how resources will be accessed, assurance that access will not be further restricted and that all avenues remain open to enjoying their current lifestyles. **Pg 69 yellow highlight.**
- 61)** Again, the plan should seek to manage what currently is available and the current situation at hand, attempting to manage landscapes back to a preexisting condition, that did not have such a heavy human factor in it is irresponsible and a fundamental waste of resources and effort. There are currently 102,000 people living in or bordering the Blue Mountains, this population base is by far more extensive than population's pre-european settlement. Landscapes should now be managed in a manner that maximizes traditional uses, while protects the resource base. **Pg 100 yellow highlight.**
- 62)** Road closures and obliterations should be the last course of action in addressing road impact on watershed health. There are plenty of management based tactics to use to minimize impacts of roads that closing or destroying such roads is not needed. **Pg 102 yellow highlight**
- 63)** Where at the 58 priority sub watersheds. **Pg 102 yellow highlight**

64) “A primary assumption for active restoration is that activities will occur in areas with established road systems (primarily within MA 4 General Forest).” Pg 103 yellow highlight

65) None of the management direction contained in this plan is intended to prevent appropriate actions needed to protect human health and safety. But the plan does by causing undo hazards life and safety by limiting safe accessibility to public lands. Pg 117 yellow highlight

Modeling systems being used in the forest plan revision

- a) Netmap
- b) DecAID
- c) Landfire
- d) Scenery Management System (may not be computer oriented)

WR-3 New

Guideline

Hydrologic connectivity and sediment delivery from roads and trails should be minimized. This includes roads inside and outside of riparian management areas (RMAs).

Reducing road-related sedimentation by reducing road density and reducing hydrologic connectivity of the road system (road miles) (WH3)	30-35 miles road surface treated (annually)	30-35 miles road surface treated (annually)	30-35 miles road surface treated (annually)
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2.7 Roads and Trails Access

Maintain the identified minimum road system needed for safe and efficient travel and for the protection, management, and use of NFS lands. Where open motor vehicle route density exceeds desired conditions, implement route closures and/or decommissioning or consider designating routes for other uses (refer to 1.1 Watershed Function for road decommissioning/obliteration objectives).	Identified minimum miles of road: 250 miles MLs 4/5 38 miles ML 3 1,025 miles ML 2	Identified minimum: 200 miles ML 4/5 200 miles ML 3 140 miles ML 2	Identified minimum: 90 miles MLs 4/5 170 miles ML 3 150 miles ML 2
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Guideline

Motor vehicle use within elk winter range should not be authorized or allowed between December 1 and April 30.