

**Walla Walla County Natural Resource Advisory Committee**  
**Comments on the**  
**Draft Environmental Impact Statement and Draft Forest Plan**  
**for the Blue Mountains National Forests.**

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# General Comments

- This document is the most bias written document I have ever seen published for public review. The primary authors don't even try to cover up their own feelings. The choices of Stan Gregory's description of why salmon populations are in low amounts and the selection of Belsky to describe the conditions caused by Grazing are prime evidence that they sought out bias documents to further their view that grazing is bad and the more it continues the worse conditions will be.
- There are many good guidelines that lead us to the right answers. It seems that someone or some entity has threatened the USFS that if they don't set very restrictive standards they will be sued.
  - It seems that all standards are not only very restrictive but they target "force" over good management. Managers are forced to either do something or not just to meet the standard when that action is not the only way or even the best way, in many instances, to accomplish an objective. The USFS needs to rewrite this document taking the personal bias out of the tone, language, and the guides and standards, to make a document that focuses the management over the next 20 years on good management; promoting multiple uses and a balance that encourages ecological AND economic resiliency for the region. This document does not do that.

## *Page 4 – Draft Land Management Plan*

*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*

## *Page 10 – Draft Land Management Plan*

*The vision for the national forests of the Blue Mountains is to maintain and restore healthy forests, landscapes, and watersheds. The national forests provide clean air, clean water, productive soils, diverse habitats, recreational opportunities, cultural benefits, quality jobs, and products that support traditional uses, communities, and economies at local, regional, and national levels.*

**Comment:** When comparing the mix of benefits and needs for change and the vision to the immediately following statement (*To address management of fuels and fire risk*) as to the on-the-ground situation, it would seem that the Land Management Plan would take rapid, aggressive measures to move towards the needed changes and the vision. None of the alternatives presented show ~~that~~ rapid, aggressive movement. Even alternative D (the most aggressive) falls way short of treatments needed with only 48% of the forested acres to be treated (*Table 293. Lands suitable for timber production as a percentage of National Forest System lands (forested)*).

**To address management of fuels and fire risk.** *Changing vegetative conditions have made forests more susceptible to disturbances, such as uncharacteristically severe fires, insects and disease. Several factors have contributed to the changes, including the cumulative effects of a periodic and sometimes extended drought, climate change, increasing vegetative density, shifts in forest species composition, and modified landscape patterns. Forested areas on the three national forests are dominated by dense, multi-storied conifer stands with tree species that are not well suited for the area. The 1990 forest plan standards and guidelines do not adequately address the multiple factors that have created the existing uncharacteristic conditions nor do they adequately address the varied nature of the landscape. Neither do they address the need for management strategies that recognize the unique qualities of various landscapes. An integrated strategy that recognizes multiple risk factors and addresses variability in conditions and site potentials is needed.*

**Wildlife Habitat**

*The increase in dense, multi-story forest stands provides habitat conditions that sustain a variety of wildlife species at higher densities and in larger areas than possibly occurred when the national forests were dominated by more open forest conditions. The challenge is to balance the need to shift forest conditions toward more open and sustainable conditions with the need to continue to provide habitat for species that prefer the dense, multi-story conditions. An additional challenge is managing public use and land management access to the road system at a level that will not render the surrounding habitat unusable to wildlife due to human disturbance and the loss of snags as a result of firewood collection and hazard tree removal.*

**Comment:** This vision is neither multiple use nor meeting the balance between ecological and economic needs from the USFS. These vision statements should be inter-related, not separated by what each “ologists” wants. There is only one landscape out there and we all have to live and work within it at the same time. Specifically these needs to state that open forest conditions were what used to be here and we need to get back to those conditions. We also need to quit defaulting to the “roads are ruining habitat (unusable to wildlife)”. Get reasonable in writing these statements. There is much science that offers many causes for the anadromous fish listing including the 4 H's and more importantly the ocean conditions. Also look at the Zumwalt area, lots of roads and still large herds of elk occupy the area.

*The National Forest Management Act requires land and resource management plans to contribute to the diversity of plant and animal communities, based on the suitability and capability of the land area, while meeting overall multiple-use objectives. The overall goal for this framework is to provide the ecological conditions that support a diversity of native plant and animal species within a planning area. Natural ecosystems are only sustainable when the native biodiversity (the variety of life and its processes) and the functional basis of productivity are maintained (Johnson and O'Neil 2001).*

**Comment:** All this, while meeting the multiple use objective, means we should be able to grow grass abundantly for cattle.

*Page 29 – Draft Plan - Paragraph 8*

**Existing Condition:** *Although the Blue Mountains are relatively intact, habitats have been impacted by interrelated changes in ecological process due to logging, grazing, fire suppression, and urban development. Although management issues exist for most vegetation communities, the primary anthropogenic impacts of the last 100 years have resulted in extensive changes in the distribution, structure, and species composition of the ponderosa pine forest.*

**Comment:** List of causes should include: recreation, mining and tourism and management suppression.

*Page 64 – Draft Plan - Paragraph 5*

#### *2.10 Culturally Significant Foods*

**Background:** *Culturally significant foods, such as water, salmon, deer, cous (biscuitroot), and huckleberries, are critical to the perpetual cultural, economic, and sovereign benefit of American Indian cultures.*

**Comment:** Where is the section on local government legal rights and the commitment to government-to-government relations with us as is required by the same laws. *40 CFR 1506.2 (b) - Elimination of duplication with State and local procedures.*

*Page 96– Draft Plan -Paragraph 1*

#### *Suitability of Areas*

*An area may be identified as generally suitable for uses that are compatible with desired conditions and objectives for that area. An area may be identified as generally not suitable for uses that are not compatible with desired conditions and objectives for that area. Identification of an area as generally suitable or generally not suitable for a use is guidance for project and activity decision making and not a commitment nor a final decision approving projects and activities. Uses of specific areas are approved through project and activity decision making.*

**Comment:** The value of management areas is most restrictive. Site specific information should be used to analyze a proposed use. Management areas just make these documents longer and more difficult to use.

*Page 149 – Draft Plan*

*Since June 2004, the revision team has been working collaboratively with local communities to:*

- *Develop a vision for the future management of the Blue Mountains national forests.*

*The revision team worked with state government, county governments, tribes, and resource advisory groups as co-conveners for the collaborative process. These groups have broad networks of contacts, have expertise in land management planning, and have demonstrated that they can build partnerships, resolve conflicts, and solve problems.*

**Comment:** Even though the Counties had cooperating agency status, the confidentiality agreement forced on the Counties before signing, removed the value of that status to the point that communities were still not engaged in the process and this statement should be removed.

You (USFS) have stonewalled us (Counties) and taken input but given no sense of direction in the planning process that you did not legally have to do. God help us if the crowds don't raise up in defiance the same as the TMP process because this is a train wreck of massive proportions.

*Page 4 – Volume 1*

*2. To address management of fuels and fire risk. Changing vegetative conditions have made forests more susceptible to disturbances, such as uncharacteristically severe fires, insects and disease. Several factors have contributed to the changes.....*

**Comment:** The 1990 plan did just fine. The restrictions that came with the fish have made the old plan useless. These were government defined rules that were a knee jerk reaction to the listing of the fish and have not worked out well for the forests, their conditions or the habitat they represent. You (USFS) only want to manage at a zero risk pattern that gets us nowhere. It needs to be accepted that management just becoming more restrictive will only make it worse.

*Page 215 – Draft Environmental Impact Statement – Volume 1, Chapter 3*

*The alternatives that result in the closest achievement of the desired conditions for forested vegetation in the shortest amount of time and across the largest number of acres would result in the greatest improvement in ecological resilience of forested vegetation. The rate and scale at which the desired conditions would be achieved is important because the pace of restoration activities has not kept up with the need resulting from fire suppression.*

**Comment:** Where is the alternative that results in the closest achievement of desired conditions for forested vegetation in the shortest amount of time and across the largest number of acres??? It was not presented or developed in this series of alternatives or documents. To satisfy this stated need, the USDA Forest Service should utilize the Wallowa County Comprehensive Management Plan, adopted February 2014, (copy attached) as a guide.

*Page 87 – Draft Environmental Impact Statement – Volume 2, Chapter 3*

*Within the three national forests, approximately 30 to 60 percent of the dry upland forest potential vegetation group contains open stand densities, compared to an estimated 80 to 90 percent historically. Approximately 40 to 70 percent of the dry upland forest potential vegetation group currently contains closed stand densities, compared to an estimated 5 to 20 percent historically. This increase in stand densities within the dry upland forest potential vegetation group has resulted in decreased tree health, growth, and vigor, decreased sunlight to the forest floor, decreased regeneration of shade intolerant/fire tolerant tree species, increased regeneration of shade tolerant/fire intolerant tree species, decreased understory productivity and diversity, increased crown continuity across the landscape, increased spread of diseases such as dwarf mistletoe, increased risk of insect attack and mortality, an increased incidence of uncharacteristically severe wildfire, and a less ecologically resilient and less sustainable forest structure.*

*Within the three national forests, approximately 41 to 58 percent of the moist upland forest potential vegetation group contains open stand densities, compared to an estimated 30 to 40*

*percent historically. Approximately 42 to 59 percent of the moist upland forest potential vegetation group contains closed stand densities, compared to 60 to 80 percent historically.*

**Comment:** Again, where is the increased pace and scale of restoration, certainly not in these alternatives or documents.

*Page 22 - Volume 2 (End of Paragraph 3)*

*The most recent status review for listed anadromous species was based on the criterion of self-sustainability (Ford 2010). The majority of the biological review team (BRT) members concluded that the SRB fall Chinook salmon, Snake River spring/summer Chinook salmon, and SRB steelhead are still high risk and “likely to become endangered in the foreseeable future.” The Middle Columbia River steelhead DPS remains listed as threatened. Although most listed spring Chinook salmon and summer steelhead populations are still considered nonviable when all lands are considered in each sub basin, indications are that populations are generally increasing. NMFS describes and monitors population viability for anadromous fish populations and major population groups at different scales: by sub basin, by major tributary watershed, and/or by groups of adjoining sub basins, depending on the population of interest.*

**Comment:** Much about the fish discussion does not track. Populations are trending up. Habitat is trending up, however, three species are "likely to become endangered in the near future. The forest is only responsible for those parts of the fish life cycle takes place on the forest. Those conditions are improving, and the “hotel” for the fish is available in most places where the fish are not nearly filling them. The habitat should stop being the scape goat and focus on the ocean where the vast majority of the loss is occurring. Many fish go to the ocean from here – not as many come back. There were lots of fish 100 years ago when the USFS was more active in their management (more timber harvest, more AUMS for grazing). This also shows that the reduction in fish numbers is not caused by actions in this area.

*Page 30 - Volume 2 (Beginning of Paragraph 2)*

*The cumulative impacts of historic and ongoing management in National Forest System and other lands are represented in the current habitat and population conditions and trends presented in table 210 through table 213.*

**Comment:** We are not sure where this belongs, however, it should be noted that the Oregon Department of Fish and Wildlife attempted to eradicate the Dolly Varden (currently called the Bull Trout) in all of our sub-basins 50 plus years ago. This chemical war went on for decades, also no limits from fishing. They are a resilient fish. The restrictive standards are not for the bull trout to survive. In fact when USFWS began listing the bull trout, ODFW asked that they not be listed in Wallowa County because there was a viable population.

*Page 36 - Volume 2 (End of Paragraph 3)*

*The following observations hold throughout the remainder of the analysis for species viability for each forest and for each individual focal species and each species of concern, including individual DPS, ESU and/or GMU:*

*Page 36 - Volume 2 (End of Last Paragraph)*

*The reduced levels of riparian vegetation use under Alternatives E and F add protections that are not reflected in Model protection scores for anadromous species and bull trout. Where protection*

*scores suggest that Alternative E and F protective benefits are similar or less than benefits of Alternatives A or B, these additional protective benefits likely result in alternatives E and F providing similar or greater benefits than alternatives A and B, but those benefits have not been quantified through application of the Blue Mountain Sustainability Model*

**Comment:** This model seems to only be based on “protection”. “Protection” is not the only way to accomplish viable healthy ecosystems. This model is based on the false assumptions that activity is bad and protection is good. The ecosystem is not that simple and the requirement of multiple use produces a different target. Additionally many of these species do just fine under a moderate level of disturbance. These models do not seem to do that. There are actual decades of monitoring and management, more than a model should be used for this analysis.

For example – in the past 20 years we have seen vegetation increased along streams. In many of these areas the waterway has been slowed down and silt has increased. This may be considered a good thing unless you are a fish and need the gravel that was once there to spawn. We often focus on one action and don't look at how it will affect another. Moderation is the key.

## **Budget**

*Page 15 – Volume 1*

### *Budget*

*Many people commented that the objectives in forest plans should not be constrained by budget, but rather should state levels needed to achieve the desired conditions. They expressed fears that budget-constrained objectives will create a ceiling and will not clearly outline the restoration needs. It is not realistic or reasonable to ignore expected funding levels. Increases in budgets beyond expected levels could result in a faster rate of achievement of the desired conditions than those projected. Recent budget trends are essentially level or slightly declining and those trends are expected to continue. The forest plan does not influence or control the budgets for the national forests, but the alternatives analyzed in this document include varying budget levels for some program areas based upon the themes of the alternatives and how the alternatives would address the various issues.*

**Comment:** If you say it often enough, even you begin to believe your own justifications. You can propose a budget in many ways. There is enough timber harvest needed in these three forests to fund your management needs far past the 20 years of this plan; and these activities would be done in an ecological manner moving toward your desired conditions. You just hid behind inaction as a positive way of management. This plan does not even have a contingency plan if there is a big increase in budget, and it is inappropriate to not be prepared if the budget gets increased. The budget sustained workers and actions 50 years ago. Most of your budget today goes towards fire suppression. Being pro-active in management would help reduce fires and thus the costs of fighting them.

*Page 42 – Draft Environmental Impact Statement – Volume 1, Chapter 2*

### ***Alternative K – Unconstrained Budget Alternative***

*An alternative that assumes an unconstrained future budget was suggested. An unconstrained budget is inherently unrealistic and unreasonable. In addition, a forest plan does not influence or*

*control the budget for a national forest. This alternative was eliminated from further study. Alternatives D, E, and F include budget assumptions that would exceed the current budget.*

**Comment:** This alternative should have been developed to show the cost needed and benefits received, if money was not an issue. In addition, the DEIS states on (pages 349-350 of Volume 3 Appendix B): *Allowable sale quantity (ASQ) is the maximum amount of volume potentially available on timber suitable lands unconstrained by budget.* It is unclear that any of the fully developed alternatives (A – F) showed this ASQ.

*Page 96– Draft Plan -Paragraph 7*

#### *Management Focus*

*The overall strategy incorporates the assessment that the level of restoration needs within the Blue Mountains is large and exceeds the capacity of the workforce and current budgets. As a consequence, there is a need to prioritize implementation of projects in order to efficiently use available resources. Those projects that benefit multiple resource areas will have a higher priority than those that benefit just one resource. Information contained in the State of Oregon Conservation Strategy, Northwest Power Planning Council sub basin assessments, ICBEMP scientific assessments, Nature Conservancy Portfolio Planning, Community Wildfire Protection Plans, and local forest assessments was utilized in the development of the management focus.*

**Comment:** Where has the concept gone that we can cut timber and make enough money to pay for cutting timber and restoring the watershed. This eliminates or reduces the problem of no budget. We need to get back to management that is aggressive enough to have a real mark on the landscape (moving it toward recovery) and pays for itself.

*Page 308 - Volume 3, Appendix A*

#### *Budget Assumptions*

*Budget assumptions are discussed to inform the reader how the budget for the alternatives was determined.*

**Comment:** This section should be removed from the document. Budget should not be included in decision making of the Forest Plan. This Plan should assume that if an action or activity is important to do (i.e. campground maintenance) then the Federal government should not use budget as an excuse and allow the activity to find its natural market place.

## **Bias**

*Page 18 – Draft Plan -Paragraph 3*

*Remaining high-quality aquatic habitats are often isolated and fragmented. Increasingly, these habitats are limited to federally-managed lands and no longer represent the full range of habitat types or conditions to which aquatic species are adapted. Restoration of watershed and aquatic habitat conditions has been underway for decades but will require an increasingly more integrated approach to improve effectiveness. Restoration needs to address terrestrial, riparian, and aquatic habitats in multiple spatial scales and multiple ownerships. In some cases, improvements may not be seen for decades or centuries (Reeves et al. 1995). Habitat restoration,*

*by itself, is not a substitute for appropriate environmental protection, and management that relies solely on rehabilitation of altered habitats cannot sustainably provide for ecosystem health (Gregory and Bisson 1997; Wissmar et al. 1994a, 1994b).*

**Comment:** There is much science that offers many causes for the anadromous fish listing including the 4 H's and more importantly the ocean conditions. Using Gregory and Bisson from 1997 shows the intentional bias since so much better, more valid and extensive research has been conducted and published since 1999.

Also, there are good habitats on private lands and are not limited to federally-managed lands only.

*Page 18- Draft Plan - Paragraph 4*

*Degraded habitat conditions and several other factors have contributed to the Federal listing of bull trout across their range; Chinook salmon (both fall and spring/summer) and steelhead in the Lower Snake Basin; and summer steelhead in the Middle Columbia Basin as threatened under the Endangered Species Act.*

**Comment:** This is about as slanted paper as I have read in decades. Bull trout were previously Dolly Varden, they were targeted for extermination by the ODFW for decades. They were poisoned in almost all, if not all, basins in the area until recently. They survived. This section needs rescinded and written appropriately. Get the bias out of the statements.

Again, there is good habitat for fish in this area. There have been numerous improvements over the past 10-20 years on habitats for the fish and they have not increased. Why were there more fish 50-100 years ago when there were more activities on the forest?

*Page 21- Draft Plan- Paragraph 6*

***Goal 1: Promote Ecological Integrity***

***Existing Condition:*** *Since the beginning of European settlement in the mid-1800s, watershed conditions in the Blue Mountains have been altered by agriculture, livestock grazing, mining, timber harvest, fire suppression, the development of an extensive road network, dams, stream channelization, and water diversions (Wissmar et al. 1994) that have resulted in widespread degradation of riparian and aquatic habitats (McIntosh et al. 1994). The intentional near extirpation of beaver in the Pacific Northwest by the Hudson's Bay Company prior to 1840 (Johnson and Chance 1974) may also have been a factor in the decline of riparian and aquatic habitats in the Blue Mountains, especially in basins where beaver were formerly abundant (Knopf and Scott 1990). Much of the remaining few high quality aquatic habitats are located on National Forest System lands and may no longer represent the historical range of occupied habitats available to aquatic species (Gregory and Bisson 1997, Sedell et al. 1997).*

**Comment:** It is quite obvious that you (USFS) are setting yourselves up to close as many roads as possible. Note, this is an ecological discussion and you only use one adjective, "extensive" to describe roads. Stop the bias. When this is read you would conclude that the entire Blue Mountain area is compromised and we must take extreme measures to "protect" it. We believe this is your intent and it is wrong.

Second, if you look at the Blues, they were used and abused in previous generations, however, the changes in management since the 1960's has changed the trend and much of the area we are familiar with, only needs vegetation harvest to be well managed. This should be discussed here, not just the doom and gloom. The USFS needs to get back to managing the lands to bring them back into ecological balance while supplying economic return the communities around them. The forest plan just continues to lock them up and "protect" them. It needs rewritten with active management the focus. It can still be done within the rules of ESA and fish if the drafters will take their personal bias out and look for positive solutions (See Wallowa County Comprehensive Management Plan for specifics).

Page 28 – Draft Plan -Paragraph 7

#### 1.1.6 Aquatic Habitat Function

**Existing Condition:** *Habitat degradation is one of the most commonly cited factors in the decline of resident and anadromous fish species in the Pacific Northwest (Gregory and Bisson 1997). Habitat quality may still be in decline in some parts of the Blue Mountains. McIntosh et al. (1994) noted significant declines in large pool habitats in managed watersheds between 1930 and 1990, while increases in large pool habitat were noted in unmanaged watersheds during the same period. Some habitat types may have been under-represented historically on National Forest System lands, underscoring the importance of the remaining high quality habitats, regardless of type or ownership. High road densities continue to contribute to poor aquatic and riparian habitat conditions. In addition, more than 1,285 culverts block or impair access by aquatic species to more than 3,700 miles of streams on National Forest System lands.*

**Comment:** Bias is shown throughout this statement. Why is there only 1999 and 2004 quoted on existing conditions? Much monitoring, analysis and research is available about this situation. You ~~sight~~ cite a questionable Author from 17 years ago. There is much more recent and valid research sources available. Most common is the 4 H's of which habitat is one. Habitat is being focused on because no one will recognize the devastation the harvest on the ocean is having. The dams are being fixed and won't be taken out and hatcheries support fishing so that economic source can continue.

Page 101– Draft Plan - Paragraph 2

*In most cases, declines in the populations of these species can be traced to habitat degradation (Gregory and Bisson, 1997).*

**Comment:** You (USFS) keep pointing to Gregory and Bisson 1997. This document is nearly 20 years old. Gregory's view of the watersheds is not the same views as today's and using this documentation shows just how narrow minded and biased the authors are.

Page 244 – Volume 1 (End of Paragraph 4)

*Re-contouring is considered to be the most effective treatment for reducing detrimental soil conditions and is estimated to reduce approximately 80 to 90 percent of road-related detrimental soil conditions (Bliss 2006).*

**Comment:** Very biased statement. The efforts in Wallowa County do not support this. Re-contouring is expensive, cause's massive disturbance in the watershed and in many instances causes more ecological damage than good. Re-contouring needs to be a site specific, case by case basis, not flat statements in the Forest plan. This sentence needs to be removed.

Page 58 - Volume 2 (Paragraph 3)

*Alternative D focuses on maximum commodities production, with a concomitant greater risk of adverse effects and loss of viability, in part due to the number of acres of potential disturbance, narrow riparian management areas, and decreased potential protection of habitat elements including water temperature, sediment, large wood inputs and stable stream banks.*

**Comment:** Not true, this alternative far from maximum commodity production. This is way below historical production. Again, an improper statement based on “any activity is bad”; therefore if actions occur conditions will be worse.

Page 247 - Volume 2 (Paragraph 5)

*Open motor vehicle route reduction would likely continue over the long term in gradually diminishing amounts until the national forests have transportation systems that achieve a more desirable balance between access needs, resource impacts, and effective open motor vehicle route maintenance capability.*

**Comment:** Again, stating what has not yet been decided, but fits the author’s bias, hope and desires.

## **Air Quality**

Page 42 –Draft Plan

### *Air Quality*

*Smoke, which includes fine particulate emissions from wildland fire (planned and unplanned ignitions), results in reduced visibility and haze at lower concentrations and can be hazardous to human health at moderate concentrations. Federal and state standards include protection of air quality-related values in Class I areas (wilderness areas greater than 5,000 acres that existed on or before August 1977; in the Blue Mountains this includes the Strawberry Mountain, Eagle Cap, and Hells Canyon Wilderness Areas). In the Blue Mountains, the primary national forest activity influencing air quality is smoke production from wildfires and prescribed fires. Smoke from the national forests cannot be eliminated. The main objectives of fuel reduction activities within the national forests are to lessen the total amount of annual smoke emissions, to reduce the risk of high-severity wildfires, and to lower the potential of smoke impacts to local communities and other smoke-sensitive areas.*

**Existing Condition:** *Smoke emissions from wildfires can vary greatly from year to year, while annual smoke emissions from prescribed fires are less variable. Both have the potential to affect local community and regional air quality.*

*.....the intent of the Oregon and Washington Smoke Management Plan is to limit the intensity and duration of smoke intrusions in order to minimize smoke exposure to humans at their place of residence or at places where they normally gather.*

**Comment:** To reduce the negative impacts of smoke emissions, a much more aggressive approach is needed than is shown in these alternatives or documents.

### 1.9 Air Quality

*Minimize smoke intrusions in smoke-sensitive receptor areas. Smoke-sensitive receptor areas are generally defined as communities with populations of more than 10,000. In the Blue Mountains, this includes Baker City, La Grande, John Day, and Pendleton. Outside of smoke-sensitive receptor areas, the intent of the Oregon and Washington Smoke Management Plan is to limit the intensity and duration of smoke intrusions in order to minimize smoke exposure to humans at their place of residence or at places where they normally gather.*

**Comment:** John Day has only 2,000 people. Grant county only 7,000. If you include John Day you should include all other communities of that size.

## Aquatic & Riparian Habitat

### *Watersheds and Aquatic Habitats*

*Watershed conditions in most areas of the Blue Mountains have been degraded to varying degrees by a long history of land use activities, including placer and lode mining, timber harvesting, road construction, livestock grazing, irrigated agriculture, water diversions, and other human uses. The impacts of these activities are still reflected in the condition of many watersheds today (McIntosh et al. 1994a, 1994b, Wissmar 2004). The extent and quality of aquatic habitats, as well as watershed and soil conditions, have been greatly reduced from historic conditions, and populations of anadromous and resident fishes have declined as a result (Gregory and Bisson 1997). In particular, large declines in pool habitat, large wood, and aquatic habitat diversity have been noted in streams in the Blue Mountains (McIntosh et al. 1994a, 1994b). In addition, high road densities contribute sediment, alter riparian habitats, and increase the rate of watershed runoff. Access to more than 3,700 stream miles on National Forest System lands are blocked or partially blocked by culverts that were not originally designed to provide for fish passage*

**Comment:** In all other areas of this plan when degradation of the USFS land is mentioned fire suppression is always included as one of the culprits for this problem. Suppression is not mentioned in this section and it does play a big part. If you don't control insects and disease outbreaks with management and don't harvest trees, allowing densities to increase, fire is needed to help control these and yet those are suppressed. When neither physical management (spraying or harvesting) nor fire is used to control outbreaks, forestry conditions decline quickly. Also it is not mentioned that years ago the USFS took woody debris out of the streams based on sound science at the time. That also should be included.

*Remaining high-quality aquatic habitats are often isolated and fragmented. Increasingly, these habitats are limited to federally-managed lands and no longer represent the full range of habitat*

*types or conditions to which aquatic species are adapted. Restoration of watershed and aquatic habitat conditions has been underway for decades but will require an increasingly more integrated approach to improve effectiveness. Restoration needs to address terrestrial, riparian, and aquatic habitats in multiple spatial scales and multiple ownerships. In some cases, improvements may not be seen for decades or centuries (Reeves et al. 1995). Habitat restoration, by itself, is not a substitute for appropriate environmental protection, and management that relies solely on rehabilitation of altered habitats cannot sustainably provide for ecosystem health (Gregory and Bisson 1997; Wissmar et al. 1994a, 1994b).*

**Comment:** Our watershed assessments do not find this to be the case. That is a value laden statement and needs taken out. Protection is not the answer, protection assumes all processes stop in time and that doesn't happen. Proper management is the key and should be the goal, not just preserving something.

*Page 18 – Draft Plan -Paragraph 6*

*Water that flows from National Forest System lands is used downstream for drinking water, irrigation, and hydroelectric power generation, among other uses. Watershed restoration may have varying societal benefits, depending on geographic location, by improving water quality for downstream users, moderating flood flows, maintaining the quantity of water that flows from streams and rivers on National Forest System lands, and reducing the amount of sediment that enters the streams.*

**Comment:** And vice versa

*Page 22 –Draft Plan - Paragraph 7*

**Key Watersheds**

**Desired Condition:** *Networks of watersheds with good habitat and functionally intact ecosystems contribute to and enhance conservation and recovery of specific threatened or endangered fish species and provide high water quality and quantity. The networks contribute to short-term conservation and long-term recovery at the major population group, core area, or other appropriate population scale.*

**Comment:** Watersheds cannot recover a species that spends most of its time outside the watershed. This is setting us up for failure. There are numerous fish that leave the watersheds here and we have supplied the hotel for the fish when they come back. We cannot make them come back and there are numerous other factors that exist as to why they don't come back. It isn't because we have inadequate habitat.

*Page 26 – Draft Plan -Paragraph 2*

**Desired Condition:** *Riparian areas consist of native assemblages of riparian-dependent plants and animals free of persistent nonnative species and provide for dispersal and travel corridors, as well as connectivity, between geographically important areas for both terrestrial and aquatic animals and plant species within the planning area.*

**Comment:** There are some areas this should be the desired condition, however, in others non-native species should be acceptable when they can hold the riparian area together when it has passed a threshold etc.

*Page 27- Draft Plan - Paragraph 3*

**Desired Condition:** *The surface and subsurface flow paths that support wetland habitats are undisturbed. The timing and duration of inundation of wetlands are within natural ranges. Plant species composition in wetlands is characteristic of the biophysical setting in which they occur.*

**Comment:** This desired condition seems extreme. Flow paths should be functional, not undisturbed. Again, bias has forced an unattainable condition.

Page 27- Draft Plan - Paragraph 7

*The aquifer supplying water to groundwater-dependent ecosystems is not being affected by groundwater withdrawal or loss of recharge. Soils of groundwater dependent ecosystems are intact and functional; erosion and deposition are within the natural range. Runout channels, if present, are functioning naturally and are not entrenched, eroded, or substantially altered. Vegetation is composed of the anticipated cover of plant species associated with the site environment; hydric species are present and are not replaced by upland species. Livestock herbivory and trampling are not adversely affecting sites.*

**Comment:** This is discussing Function of the Ecosystem; it should be changed to: Need not adversely affecting the functionality of the sites.

Page 27 – Draft Plan -Paragraph 9

**Existing Condition:** *Timber harvest, mining, water diversion, livestock grazing, channelization, and road construction adjacent to streams have all affected stream channels in the Blue Mountains. Most managed watersheds have high road densities (greater than 2.4 miles per square mile) that result in increased sediment delivery from road surfaces, drainage features, and road-stream crossings. Roads constructed within riparian areas are likely to directly affect stream channels or limit lateral migration of the channel.*

**Comment:** Recreational activities such as recreational camping and driving, wood cutting, 4-wheeling, etc. should also be listed as affecting stream channels. Why do you seem to forget recreational impacts?

Page 44 – Draft Plan -Paragraph 4

#### *1.11 Water Quality*

*The quality of water emanating from the national forests is sufficient to provide for state-designated beneficial uses, including human uses.*

**Comment:** Much of these problems are not caused by actions on the federal forest lands. Many times these listings are listing natural conditions. This desired condition should state that National forest lands will not have a net contribution to these issues above the historical range of variability.

Page 102 – Draft Land Management Plan

*Land managers should recognize and seek to restore the processes responsible for creating and*

*maintaining aquatic and riparian habitats, as well as the diversity of those habitats. This may include, but is not limited to:*

*Altering the structure and composition of upland vegetation in order to make progress toward achieving desired conditions*

*Managing vegetation to reduce wildfire risk and restore stand structure and resiliency*

*Reducing road-related erosion and sediment delivery to streams through road closure, road obliteration, improved maintenance, and/or improved erosion control*

*Removing barriers that block or restrict access to historically occupied habitats or restrict connectivity between habitats*

*Altering riparian habitats to favor deciduous trees and shrubs as appropriate where such species were formerly abundant*

*Reintroducing keystone species, such as beaver, into suitable habitats within their former range*

*Increasing the diversity and complexity of aquatic and riparian habitats by promoting natural establishment and succession of riparian plant communities*

*Restoring the natural range of stream flows to the extent possible  
Managing invasive species to maintain the composition and diversity of native species*

*Restoring complexity and aquatic and riparian habitat*

*Adapting management actions to account for the expected effects of climate change*

*Page 234 – Draft Environmental Impact Statement – Volume 2, Chapter 3*

*Timber harvest and thinning should occur in riparian management areas only as necessary to maintain, restore or enhance conditions that are needed to support aquatic and riparian dependent resources (guideline MA 4B RMA-FOR-1).*

**Comment:** We agree with both of these excerpts; however, riparian management through timber harvest and thinning has been mostly ignored in the past 20 years. It is time to restore and maintain the riparian areas before they are lost through insect and disease or wildfire.

*Page 110/111- Draft Plan*

**Table 29. Monitoring plan framework for the action alternatives for each national forest**

*1. Status of select watershed conditions. Key ecosystem characteristics related to water resources and watershed conditions, such as water quality, quantity, timing and distribution provide the basis for monitoring watershed conditions.*

*Plan Component – 1.11 Water Quality*

**Comment:** Not sure a stream is ever taken off this list. If so the sensitivity of the list is not within a 5 year window. DEQ does not regularly remove streams without someone initiating the process after many years of monitoring and then the process could take years. This is not a valid monitoring protocol.

*Proposed Monitoring Question? ---What is the status and trend of watershed condition in all watersheds and in key watersheds?*

**Comment:** No way you will be able to establish trend in 3 -5 yrs. More like 3 -5 decades

*Proposed Monitoring Question? What is the status and trend of riparian vegetation condition?*

**Comment:** No trend in 5 years.

*Proposed Monitoring Question? What is the change in the distribution of known sites for selected aquatic and riparian invasive species?*

**Comment:** No trend in timeline.

*Proposed Monitoring Question? What is the status and trend of aquatic habitat?*

**Comment:** No trend in 5 years.

*Page 113 – Draft Plan*

*Table 29, 3. Status of select set of the ecological conditions required under §219.9 to contribute to the recovery of federally listed threatened and endangered species, conserve proposed and candidate species, and maintain a viable population of each species of conservation concern.*

*Proposed Monitoring Question? What is the condition and trend in habitats for aquatic focal species (steelhead, spring Chinook salmon, bull trout, and redband trout) ----- Annual, 5 year*

**Comment:** These timelines are inappropriate. Monitoring protocols need to be understood by the authors. Trend cannot be determined on an annual basis. If this is PIBO required, no wonder PIBO is so hard to comply with. It has unrealistic standards.

*Page 113 – Draft Plan*

*4. Status of focal species to assess the ecological conditions required under § 219.9*

*Proposed Monitoring Question? What are the population trends and/or habitat trends of the management indicator species? ----State population data/open route density on winter range/FACTS*

**Comment:** Open road densities are not the cause of all evils and this draft plan should have this over simplification removed from it.

*Page 91– Draft Plan -Paragraph 5*

*MA 4B Riparian Management Areas*

**Description:** Riparian management areas (RMAs) are areas that include portions of watersheds where aquatic and riparian-dependent resources receive primary emphasis and where special management direction applies. Riparian management areas encompass lands adjacent to permanently flowing streams, ponds, lakes, wetlands, seeps, springs, and intermittent streams, including geologically unstable sites that may influence these lands. Riparian management areas will generally have minimum widths but are designed to extend to the outer edge of riparian vegetation, or to the outer extent of the 100-year floodplain, whichever is greater. Riparian management areas are managed to maintain and restore the riparian structure and function of intermittent and perennial streams, confer benefits to riparian-dependent plant and animal species, enhance habitat conservation for organisms that are dependent on the transition zone between upslope and riparian areas, and provide for greater connectivity within and between watersheds for both riparian and upland species.

**Comment:** Intermittent streams should not be included in this designation unless there is a permanent channel showing regular use by water.

Page 92– Draft Plan -Paragraph 2

**Table 24. Riparian management area widths**

<b>Category</b>	<b>Minimum Riparian Management Area Width*</b>
<i>Fish-bearing streams</i>	<i>300 feet slope distance on either side of stream or to outer edge of 100-year floodplain, whichever is greatest</i>
<i>Permanently-flowing non-fish-bearing streams</i>	<i>150 feet slope distance on either side of stream or to outer edge of 100-year floodplain, whichever is greatest</i>
<i>Constructed ponds, reservoirs and wetlands greater than 1 acre</i>	<i>150 feet slope distance from the outer edge of wetland or from the maximum pool elevation, whichever is greatest</i>
<i>Lakes and natural ponds</i>	<i>300 feet slope distance</i>
<i>Seasonally-flowing, intermittent and ephemeral streams, wetlands smaller than 1 acre, and unstable areas</i>	<i>100 feet slope distance</i>

**Comment:** Should use Oregon Forest Practices Act numbers here.

**Comment:** These set-backs should stop if the landscape is interrupted by a road or cliff that stops the movement of silt, water or even wildlife and livestock.

Page 309 – Volume 1

**Key indicator:**

*Riparian habitat conservation area (RHCA) and riparian management area (RMA) acres*  
*The acres of RHCAs (alternative A) and RMAs (all action alternatives) and the minimum percent of forest area that each would encompass are displayed in table 197.*

<b>RHCAs acres (%)</b>	<b>Alt. B RMAs acres (%)</b>	<b>Alt. C RMAs acres (%)</b>	<b>Alt. D RMAs acres (%)</b>	<b>Alts. E and F RMAs acres (%)</b>
360,123 (20%)	362,520 (20%)	727,527 (40%)	162,932 (9%)	360,123 (20%)

**Comment:** This is a significant issue and change in standards from current situation. RHCA's restrictions will eliminate most uses from these areas. This is over reaching of needed protections.

*Page 31 - Volume 2 (End of Paragraph 1)*

*When riparian areas and aquatic habitats are protected from chronic impacts of these activities, they can typically recover without additional assistance from active restoration, but slowly....*

**Comment:** This is a totally biased and incorrect statement. First, just protecting a riparian area does not necessarily mean it will recover, especially if it has gone over a threshold. Second, when managed correctly riparian areas are very resilient and if they have not gone over a threshold, proper management allows them to recover (if needed) relatively quickly.

*Page 183 - Volume 3, Appendix A*

### ***1.1.2 Riparian Function***

***Desired Condition:*** Riparian management areas (RMAs) within any given watershed reflect a natural composition of native flora and fauna and a distribution of physical, chemical, and biological conditions appropriate to natural disturbance regimes affecting the area.

**Comment:** This is a "function" desired condition. It should not dictate whether the flora and fauna are native or not. That is a social issue.

*Page 223 - Volume 3, Appendix A (paragraph 2)*

### **MA 4B Riparian Management Areas**

**Description:** Riparian management areas (RMAs) are areas that include portions of watersheds where aquatic and riparian-dependent resources receive primary emphasis and where special management direction applies. Riparian management areas encompass lands adjacent to permanently flowing streams, ponds, lakes, wetlands, seeps, springs, and intermittent streams, including geologically unstable sites that may influence these lands. Riparian management areas will generally have minimum widths (displayed in table A-37, table A-38, and table A-39) but are designed to extend to the outer edge of riparian vegetation or to the outer extent of the 100-year floodplain, whichever is greater.

**Comment:** This does not include intermittent streams. And it needs to stay that way.

*Page 293- Volume 3, Appendix A*

### ***MA 4B Riparian Management Areas***

***Guideline*** When riparian management areas are functioning properly, project activities should be designed to maintain those conditions. When riparian management areas are not properly functioning, project activities should be designed to improve those conditions. Project activities in riparian management areas should not result in long-term degradation to aquatic and riparian conditions at the watershed scale. Limited short term or site-scale effects from activities in riparian management areas may be acceptable when they support, or do not diminish, long-term benefits to aquatic and riparian resources.

**Comment:** PFC's should not be the monitoring technique for this. If so, they are being misused. PFC's were not built to be a monitoring technique and should not be used as such.

# Climate Change

Page 19 – Draft Land Management Plan

*The climate change adaptation strategy is addressed in the desired conditions by:*

*Including genetic considerations that are likely to be better adapted to the expected climate and changed species distribution*

*Desiring lower stand densities, especially in areas that are uncharacteristically dense*

*Desiring fewer multi-layer stands*

*Desiring greater abundance of early seral tree species (ponderosa pine and larch)*

*Desiring a larger portion of the landscape to have larger diameter overstory trees along with reduced amounts of smaller diameter understory trees*

*Desiring fewer invasive species*

*The climate change mitigation factor is addressed in the desired conditions by:*

*Managing for longer forest stand rotations and older trees to store more carbon*

*Taking into consideration the increasing use of biomass as technology becomes available and demand grows*

**Comment:** The climate change adaptation strategy is stated but the desired conditions cannot be met with the alternatives presented in these documents. Again, see Wallowa County Comprehensive Management Plan.

Page 16 – Draft Land Management Plan

*Average temperatures in the Pacific Northwest have increased by about 1 degree Celsius (1.8 degrees Fahrenheit) since 1900, and the rate of warming during the last 50 years is nearly twice the rate of the previous 100 years (ISAB 2007). The rate of warming is expected to increase in the 21st century. Mean annual temperatures are expected to rise by 0.3 degrees Celsius (0.5 degrees Fahrenheit) per decade through 2050 in response to continued increases in atmospheric greenhouse gases (Mote et al. 2008). After 2050, projected temperature increases rely largely on changes in greenhouse gas emissions from the present levels. Total temperature increases could reach 3 degrees Celsius (5.3 degrees Fahrenheit), relative to the 1970-1999 average, by the decade of 2080-89. Little change in precipitation is predicted, although model results vary from minus 10 percent to plus 20 percent change by 2080.*

Page 17 – Draft Land Management Plan

*Other expected changes in the Pacific Northwest include:*

*Higher temperatures will result in more winter precipitation falling as rain instead of snow.*

*Low elevation snow packs may disappear completely; average snowpack is expected to decline by 53 to 65 percent by the decade of 2080-89.*

*Winter precipitation is expected to increase slightly and summer precipitation is expected to decrease slightly.*

*Increased winter and spring temperatures combined with decreased winter snowfall will exacerbate the current trend toward earlier spring runoff and lower late-season stream flow.*

*Winter stream flow will be more variable with an increased likelihood of rain-on-snow floods.*

*Increased risk of higher flood peaks as well as increased risk of extended droughts is expected.*

*Lower summer stream flow and higher summer water temperatures will likely reduce available habitat for cold-water fish species (ISAB 2007) and alter disturbance regimes, including, but not limited to, increased fire severity and frequency and more frequent occurrences of forest insects and disease outbreaks.*

*Page 351 – Draft Environmental Impact Statement – Volume 2, Chapter 3*

*Researchers speculate that a warming climate will alter precipitation patterns, with some regions becoming drier and others wetter. Within the Pacific Northwest, a recent model predicts warmer and wetter winters in 80 years.*

**Comment:** The above three excerpts from the Draft Land Management Plan and DEIS show an increase in temperature and moisture in the future. This climate condition will result in an increase in vegetation growth, which will exacerbate the already overstocked dense timber stands with the potential of more catastrophic wildfires. The need for aggressive action is again called for.

*Page 15 – Draft Plan - Paragraph 5*

***Fire-adapted Ecosystems***

*Fire is a natural part of the ecosystem and ecosystems within the national forests exhibit a wide diversity of natural fire behavior. The cumulative effects of periodic and sometimes extended drought, climate change, increasing vegetative density, shifts in forested species composition, and modified landscape patterns have resulted in conditions in many locations that are outside the range of what is sustainable. These conditions may put the ecosystem at high risk of uncharacteristically large and severe fires and disturbances from insects and disease. The potential for fires with uncharacteristically severe effects exists on approximately 60 percent of the three national forests. In addition, climate change may lead to longer fire seasons and more severe fires. These conditions increase both the challenge and the motivation for restoring the landscape to reduce the severity of fires.*

**Comment:** Reduction in forest management and lack of logging and thinning not just climate change are major causes of this situation. This is all the more reason to do active management.

*Page 23/24- Draft Pan*

**Existing Condition:** *Runoff from watersheds in the Blue Mountains is largely dominated by snowmelt between March and June, along with the earlier runoff from low-elevation watersheds and later runoff from high-elevation watersheds. However, in lower elevation watersheds, a substantial part of annual stream flow, and most peak flow events, occurs during winter rains between December and February. There is some indication of increasing summer stream flow in parts of the Blue Mountains since the early 1900s (Wissmar et al. 1994a) that some authors attribute to land use effects, but that could also be driven by changes in the seasonal distribution of precipitation (details are in the project record). There is also evidence that the amount of precipitation that becomes stream flow is declining, which is consistent with observed climate warming since about 1950 and may be attributed to increased rates of evaporation and transpiration by terrestrial vegetation in response to increasing temperature. Changes in the timing of runoff, combined with changes in stream temperature due to climate change, could affect, for example, the timing of migration and spawning success of salmonid species, as well as alter the availability of water for downstream users.*

**Comment:** This could also be from improved infiltration rates on grasslands since conditions and soils have recovered from early 1900 overuse.

Page 57– Volume 1 (last sentence)

*Compared to 1970 to 1999, temperatures are expected to be 2.8 to 9.7 °F warmer by 2100 (Littell et al. 2009a).*

**Comment:** Funny this stops at 1999 because temperatures stopped going up at this stage. Look up George Taylor (previous state climatologist) information.

Page 59– Volume 1

*Management strategies to increase the adaptive capacity of terrestrial ecosystems in the face of climate change include:*

- *Conserving species and habitats threatened directly or indirectly by climate change*
- *Enhancing landscape connectivity*
- *Reducing barriers to species movement caused by shifts in habitat distributions*
- *Reducing the risk of uncharacteristically severe fires and insects and disease disturbances*
- *Reducing the extent of nonnative invasive species and preventing future infestations*

**Comment:** This is a 15 to 20 year plan. What to do in the next 20 years does not warrant this kind of effort.

**Comment:** If the climate is changing permanently then quit trying to hold back the inevitable. These species will go away on this acre and others will replace them. THAT IS NATURAL!

**Comment:** This would be great to do. If you were serious about this you would get over your social issue of only native and utilize non-native, improved species to keep sites occupied while the natives recover from whatever has harmed them.

**Comment:** Utilize non-native, improved species to keep sites occupied while the natives recover from whatever has harmed them. (See fire section for additional information on this topic.)

Page 158 – Volume 1

**Climate Change**

*Climate change, primarily through increases in temperatures and CO<sub>2</sub>, and changes in precipitation, likely will result in shifts in species composition and distributions of rangeland communities and thus also in forage production. Climate changes have resulted and will continue to result in earlier initiation of the growing season, longer growing season length, earlier plant senescence,*

**Comment:** This is all conjecture that might happen over a very long time frame. This plan is for 15 or 20 years. Even if it is true, very few of these changes will occur in the next 15 years and it just as likely will turn around and cool.

Page 182 – Volume 1 (Paragraph 4)

*Although increases in temperature, changes in precipitation, higher atmospheric concentrations of carbon dioxide (CO<sub>2</sub>), and higher nitrogen (N) deposition may change ecosystem structure and function by the end of the 21st century, the most rapidly visible and most significant short-term effects on forest ecosystems may be caused by altered disturbance regimes (Vose et al.2012). Inadequate water availability coupled with drying conditions could contribute to an overall increase in the vulnerability of old forest to fire, insects, and drought. Recent forest dieback in the western United States and model simulations indicates that the frequency and magnitude of some disturbance events (e.g., drought, wildfire, and insect outbreaks) may be changing (Allen et al. 2010).*

**Comment:** We thought the prediction was for increased rain and precipitation? Climate change as you describe it is that we have more precipitation per year, however, less snowpack and more of it comes in rain. Also more rain in April, June and August. The additional rain in August may be the most important to the terrestrial plants as summer precipitation goes up the resiliency of individual plants improves. This summer moisture helps the plants weather the longer summer drought season. The best evidence of this is that the dry country in the southern half of Malheur forest had the same overgrazing as the WWNF in the North. The percent of Bunch grass survival through the early 1900's is drastically different than that from the WWNF in the areas where more summer precipitation is available. These plants are better prepared for the dry season.

Page 183 – Volume 1 (End of Paragraph 1)

*For a mean temperature increase of 4° F (expected by the mid-21st century), annual area burned by wildfire is expected to increase by a factor of 1.5 to 5.*

**Comment:** Interesting it is the temperatures fault not the overstocked conditions of the forest that cause bigger fires. This is not true. All reasons need listed and discussed.

## **Insect & Disease**

Page 100 – Draft Environmental Impact Statement – Volume 2, Chapter 3

*Characteristic levels of insect and disease activity consistent with the HRV would contribute to diverse landscape conditions and provides important wildlife habitat components, such as hollow trees, dead wood, and mistletoe brooms. The desired conditions for vegetation structure, stand density, and species composition would create stand conditions with low to moderate susceptibility to insects and diseases across the majority of the upland forest potential vegetation*

*groups. These stand conditions result in resilient forests capable of absorbing disturbances while retaining the same basic structure and ways of functioning, the capacity for self-organization, and the capacity to adapt to stress and change.*

**Comment:** Again, a more aggressive alternative is needed, than is presented in the DEIS, to reach desired conditions. The alternatives presented in the DEIS show the pace and change of restoration in reverse.

## **Range**

### **Range - General**

- Need to suggest change in line of acceptable /non acceptable as moderate departure should be included in the acceptable stage.
- Utilization standards should not be defined in the forest plan. The forest plan should lay out the desired conditions and then identify topics or issues of concern and possibly ways to mitigate it. NOT STANDARDS TO NOT EXCEED.

### **Non-native vs. Native seeding for grasses**

The use of non-native grass seedings in Wallowa County have been used successfully in the past, Arleigh Isley (Wildcat Fire, 1986). The mix of non-native non persistent perennials and annual cereal grains reduced erosion, supplied short term forage for livestock and wildlife and offered cover for the surviving native plants to recover from the fire and reproduce. Twenty five years later there is little to no evidence of those non-natives that were planted and the native populations are in good health.

Evidence of such successes is seen in some of the literature. First and foremost the fire science brief from 2011 indicates that seeding to curtail non-native plant species invasions, 54 percent stated that seeding treatments were effective and 45 percent stated they were ineffective. However, Of those treatments that were regarded as effective, 83 percent used non-native species (i.e., grasses and cereal grains).

Many papers showed little success in reducing erosion immediately or over the first two years. It needs to be pointed out that when you allow devastating fires to occur (fuel treatment of our forests stops many of these) there are going to be consequences and patience in seeding is needed. Few if any of the papers discussed the value after two years and none discussed what was growing in the sites where seedings were unsuccessful. Another paper discussed that the damage to the soil surface by the rangeland drill caused more issues than not seeding at all. This brings to surface some of the issues around the current analysis of the seedings. First, not all seedings need to be or should be done just following fire. Also the most successful seedings historically were those that the grass seed was flown on while the ashes are still hot. This offers a great seed bed and as the ashes settle they create great seed soil contact. Bottom line is that there is ample evidence that non-native seeds are and can be successful in reducing the invasion of noxious weeds, in particular the invasive annuals such as medusa head, venenata and

cheatgrass. We need to be aggressively moving to block those annuals from spreading. Native seedings are much more expensive with much lower success rates. Even though the native recovery might be slowed, it should be compared to what will occur if we don't seed which is more and more becoming annual invasive weeds.

The use of non-native cereals and non-persistent perennials should be considered any place native seed does not have a high probability of success for any disturbed soils. This should include fires, logging, construction, mass wasting in the canyons or any other place the Forest has open potential weed sites.

## Native/non-native Bibliography

Evaluating the Effects and Effectiveness of Post fire Seeding Treatments in Western Forests  
Joint fire science programs. Fire Science brief. Fire Science Brief Issue 147 December 2011 Page 1  
[www.firescience.gov](http://www.firescience.gov)

### **Summary**

High-severity wild fires can profoundly affect soils and plant communities, thus requiring emergency rehabilitation treatments such as post-fire seeding. Intended to stabilize soils, reduce erosion, and combat non-native species invasions, post-fire seeding is typically one of the first treatments used by most U.S. natural resource agencies. But despite its widespread use, there is still doubt about the treatment's actual effectiveness and ecological impacts. Therefore, researchers conducted a study to gain more definitive insight on the ecological effects and usefulness of post-fire seeding. The first part of the study involved an evidence-based review of scientific articles, theses, and government publications to address questions on soil erosion, non-native plant invasion, and native plant community recovery. Researchers then analyzed Forest Service Burned Area Reports to assess seeding trends related to species, costs, and area seeded.

### **Key Findings**

- In studies that evaluated soil erosion in seeded versus unseeded controls, 78 percent revealed that seeding did not reduce erosion relative to unseeded controls. Even when seeding significantly increased vegetative cover, there was insufficient plant cover to stabilize soils within the first two years after fire.
- Sixty percent of the studies reported that seeding deterred native plant recovery in the short-term.
- Out of 11 papers that evaluated the ability of seeding to curtail non-native plant species invasions, 54 percent stated that seeding treatments were effective and 45 percent stated they were ineffective.
- Forty papers and 67 Burned Area Reports dated between 1970 and 2006 revealed an increased use of native species and annual cereal grains/hybrids during seeding treatments over time, with native species dominating seed mixes.
- From 2000 to 2007, total Burned Area Emergency Response (BAER) seeding expenditures have increased substantially, reaching an average of \$3.3 million per year—a 192 percent increase compared to the average spent over the previous 30 years.

### **Questions asked:**

- Does seeding after severe forest fires reduce soil erosion?
- Is seeding effective at reducing non-native plant invasion in burned areas?
- Does post-fire seeding affect native plant community recovery?

### **Results**

After applying specific inclusion criteria, 94 of approximately 19,455 studies were considered relevant for the evidence-based review portion of this study. Research results related to soil erosion, non-native plant invasions, and native plant community recovery are as follows:

- According to 78 percent of the studies that evaluated soil erosion in both seeded and unseeded areas, seeding did not reduce erosion relative to unseeded controls. Even when seeding significantly increased vegetative cover, there was not enough plant cover to stabilize soils within the first 2 years after fire.
- Out of 11 papers that evaluated the effectiveness of seeding to curtail non-native plant invasions, 54 percent indicated that seeding treatments were effective and 45 percent indicated that the treatments were ineffective. Of those treatments that were regarded as effective, however, 83 percent used non-native species (i.e., grasses and cereal grains).
- Sixty percent of the studies indicated that seeding suppressed native plant recovery. However, long-term impacts were not studied.
- Data indicated an increase in the use of native species and annual cereal grains/hybrids, with native species dominating seed mixes over non-native species in recent years.
- Seeding expenditures have increased exponentially, by 192 percent over the past decade (compared to the average spent during the previous 30 years), reaching an average of \$3.3 million spent annually. In the 1970s, the percentage of total burned area that was seeded averaged 21 percent compared to only 4 percent between 2000 and 2007; however, the cost per acre seeded has risen over time. This inflated cost is likely due to the increased use of more expensive native species.

Postfire Seeding for Erosion Control: Effectiveness and Impacts on Native Plant Communities  
JAN L. BEYERS, 2004

Seeding must be done immediately after fire to effectively reduce the abundance of cheatgrass, and the seeded perennials must be protected from grazing if they are to establish themselves successfully (Evans & Young 1978).

Hillslope seeded with wheatgrass species, a grass commonly used for post-fire seeding treatments. Credit: USDA Forest Service.

*1.2 Species Diversity*

**Background:** *Providing for the appropriate amount, distribution, and quality of habitat for native and desired nonnative aquatic and terrestrial species (plants and animals, vertebrates and invertebrates) within the Blue Mountains is an integral component of ecological function. The ability to sustain this habitat, as well as the connectivity of habitat patches, is also important to the maintenance of ecological function.*

**Comment:** It's OK to have non-native here when we want fish species diversity, but not OK to have non-native in grasses and forbs when seeding and doing restoration work. The fish are in direct competition with ESA fish and grasses are not. It should be OK to plant non-native grasses and forbs anywhere when vegetation is needed in a timely manner to prevent weeds from sprouting and to obtain vegetative cover to prevent erosion..

*Page 43 – Draft Plan - Paragraph 5*

*1.10 Soil Quality*

**Existing Condition:** *The quality of national forest soils across the Blue Mountains has been affected to varying degrees by past land uses, such as livestock grazing, the introduction of nonnative plant species, timber harvesting, road construction, mining, wildfire suppression, and off-highway vehicle use. The effect of these activities is reduced ground cover, altered vegetative conditions, increased soil erosion rates, and depressed soil productivity and hydrologic function.*

**Comment:** There are many beneficial nonnative plant species that we have planted. These are not a cause of what is described before. This needs taken out. Non-native annual grasses are a concern but the perennials should not be.

*Page 125 –Draft Plan*

***Range Management and Domestic Livestock Grazing***

*(standards and guidelines apply to all three national forests)*

*RNG-1 G-43 Modified*

***Guideline***

*Grazing after wildland fire (planned and unplanned ignitions) should be managed so as not to cause a trend away from the key species desired condition. This may include growing season deferment for one or more years following wildland fire.*

**Comment:** This is a good guideline. It has common sense and allows for site specific decision making.

*RNG-5 New*

***Guideline (for uplands)***

*Maximum percent utilization by management*

*system*

*Utilization should be based on a point in time measurement. Utilization includes all use by permitted livestock, wildlife, insects, wildfire, or recreational use. Utilization will be based on height-weight curves and/or ocular estimates or other approved measures. Utilization is based on key species.*

**Comment:** Ocular estimates are too objective to have for utilization.

*Page 148 – Draft Plan*

***Range***

*Livestock grazing on the Blue Mountains national forests is an important use to the local ranching industry. Grazing on public lands contributes directly to livestock forage needs. In 2009, the counties in the Oregon portion of the plan revision area had about 40 percent of the total cattle inventory of the state (USDA National Agriculture Statistics Service). Grazing on national forest lands directly provided about three percent of the forage needs of the local cattle inventory. The total contribution of national forest grazing is likely greater since ranchers have the opportunity to grow forage on other ranch lands for feed.*

**Comment:** They cannot be talking about "local cattle inventory" in the three forests. In Wallowa County we have 23,500 mother cows. They need 282,000 AUMs for 12 months. They graze approximately 90,000 in Wallowa County that is over 30% in our county. If you just use grazing and leave out the winter feeding it is much more than that.

*Page 38– Volume 1*

***Issue 3: Livestock Grazing and Grazing Land Vegetation***

*Proposals made for alternative B would be retained with the following exceptions. An objective designed to improve a portion of rangeland in phase C or D to phase A or B would be included. Utilization guidelines would place additional limitations on livestock grazing in sub watersheds with occupied bull trout spawning and rearing reaches and habitat for listed anadromous fish species.*

**Comment:** This is wholly and completely unacceptable. We have been successfully grazing these lands for 20 years now under the PIBO rules and the range conditions have been improving. If there is a positive trend with the current management why would USFS want to add more restrictive regulations?

*Page 49– Volume 1*

***Table 3. Key indicators for each alternative for the Wallowa-Whitman National Forest***

*Livestock income from various alternatives*

**Comment:** You have no idea what effect the restrictions you are requiring for bull trout and anadromous fish will do to these lines. YOU MUST BE HONEST IN HOW BAD THIS WILL BE. If the anadromous fish and the bull trout restrictions are put in place, the grazing on the three national forests will be reduced by over half. With those types of reductions the income will be

more devastating than that because most ranches in the areas would not survive without their permits causing significant economic collapse of the local economies. This needs to be modeled and analyzed before moving on.

Page 96 – Volume 1 (Paragraph 2)

*Livestock grazing is measured in head months (HMs) and animal unit months (AUMs) for permitted use and authorized use.*

**Comment:** There needs to be a lot more explanation around this information. AUM's, dollars and jobs seem disconnected.

Page 96 – Volume 1 (Last Paragraph)

*Permitted AUMs are measures of planned capacity and are the number of AUMs that are specified by the grazing permit for the duration of the permit (FSM 2230.5). The permit is usually valid for 10 years (FSM 2231.03). Permitted AUMs provides a comparable indicator for Forest Service and BLM grazing capacity. Authorized AUMs is the amount of forage permittees pay for*

**Comment:** New rules will be in effect for 15 years or 20 years, not 10 years.

Page 130 – Volume 1 (Paragraph 3)

*The basic measures of grazing land health are tied to the state and transition models with phases A and B presumed to be capable of ensuring long-term sustainability and resiliency. Phase C is assumed to be of concern but is still likely to allow grazing land to operate within the range of natural variability. Phase D is assumed to have resulted from some impact that may have crossed a threshold. Although there is no direct measure of grazing land health parameters associated with these phases, impacts to grazing land vegetation are often directly related and correlated to impacts to the soil resource. Therefore, the use of the phases model is believed to be a good representation of soil stability, nutrient cycles, disturbance resilience, plant species composition and health, and watershed function.*

**Comment:** If you are going to use the new methodology you must first explain it in detail allowing for the public to be able analyze the plan in an orderly fashion. You have not done this and therefore there is no way to adequately analyze the effects.

Dr. Sherman Swanson is an associate professor and state extension specialist in the Department of Natural Resources and Environmental Science at the University of Nevada, Reno states in The Great Basin Wildlife Forum, a search for solutions, a forum; “ The Forest Service, having rejected rangeland health assessment, drafted matrices that describe irreversible thresholds. Although useful, these suffer from excessive lumping without the benefit of soil surveys and ESDs to create maps, making it difficult to identify management needed to avoid transitioning to a new undesirable state.” Where Interpreting Indicators of Rangeland health is even being used by local USFS employees and is referenced in official documents. This methodology should be changed to become the IIRH.

Page 138 – Volume 1

**Table 85. Summary (acres) of current vegetation survey plot phases for the existing condition (alternative A) for each national forest**

	<i>Malheur</i>	<i>Umatilla</i>	<i>Wallowa Whitman</i>
<i>A or B grazable forestland</i>	1,028,700 (81%)	535,800 (94%)	718,900 (91%)
<i>C or D grazable forestland</i>	241,000 (19%)	34,200 (6%)	71,100 (9%)
<b><i>Total grazable forestland</i></b>	<b>1,270,000</b>	<b>570,000</b>	<b>790,000</b>
<i>A or B rangeland</i>	59,800 (28%)	98,400 (43%)	118,000 (42%)
<i>C or D rangeland</i>	170,200 (72%)	141,600 (57%)	177,000 (58%)
<b><i>Total rangeland</i></b>	<b>230,000</b>	<b>240,000</b>	<b>295,000</b>

**Comment:** This graph states that 58% of the Wallowa Whitman has either crossed a threshold or *is thought to be of concern*. This does not represent the rangelands we have assessed in Wallowa County. In Lower Joseph Creek Watershed assessment, Interpretive Indicator information found that current management is maintaining ecological conditions on the south facing plateaus and ridge side slopes, north facing foot slopes and concave swells. Soil erosion appears to be consistent with the hillside slope of hydrology and summer thunderstorms infiltration limitations of the shallow soils, rocky sites, open meadows, scab lands and steep inter-slopes. Erosion on the north slopes, flat plateau slopes, and inter-concave slopes appear to be consistent with current hillside dendrology. Sites with well vegetated mid to late serial perennial bunch grasses and annual grasses and forb plant communities the soils are generally finely aggregated stable in forbs. Trends of most sites were upward where trend could be determined from C&T plots or from species compositions. This watershed is very typical of the watershed across the three forests. This analysis needs changed and real analysis from the region used, not models and estimates.

*Page 147 – Volume 1*

***Environmental Consequences – Grazing Land Vegetation***

*For alternative A the amount of rangeland in phases A through D is expected to remain unchanged, since recovery of native species on rangeland appears to have stabilized during the last 10 years (Countryman and Swanson, project record). Rangelands that are currently in phase C as a result of livestock grazing could show passive recovery if permitted livestock numbers are reduced. Rangelands that are currently in phase D are not expected to change as a result of decreased livestock numbers.*

**Comment:** The above statement about Rangelands in phase C falls back into the old misguided theory that the best and only way to improve range is to reduce livestock numbers and allow for “passive recovery” to occur. The past 50 years of range science should be looked and studied to find that much of the time reducing numbers does not fix the problem. Changing the management, if in fact cattle are the problem is the best and fastest way to improve the range conditions. But first we need to really identify on a site specific basis that the cattle grazing, are in fact, the issue.

*Page 136 – Volume 1 (Paragraph 2)*

Overall, PIBO monitoring tends to show a more stable riparian condition at the reference sites. While certain parameters recorded lower values at the managed sites relative to the reference sites, the raw data shows that, in general, the sites open to livestock grazing were recovering in the presence of managed livestock grazing.

**Comment:** You have increased grazing restrictions, such as utilization standards, so severely it will limit if not remove livestock from the riparian areas. This in turn will reduce the economic value from the forest. The restrictions are neither warranted nor needed. Return the grazing standards to a workable level (see Wallowa County Comprehensive Management Plan for national forest lands).

Page 151 – Volume 1

**Table 90. Umatilla National Forest livestock grazing indicators for each alternative**

<b>Indicator</b>	<b>Alt. A</b>	<b>Alt. B</b>	<b>Alt. C</b>	<b>Alt. D</b>	<b>Alt. E</b>	<b>Alt. F</b>
<i>Acres suitable for permitted cattle grazing in active allotments</i>	284,000	298,000	30,000	284,000	284,000	284,000
<i>Acres suitable for permitted sheep grazing in active allotments</i>	60,000	28,000	13,000	42,000	42,000	42,000
<i>Permitted animal unit months (cattle)</i>	30,000	31,000	3,000	30,000	30,000	30,000
<i>Permitted animal unit months (sheep)</i>	7,800	4,600	1,200	5,800	5,800	5,800

**Comment:** Where do these acres occur? Without specifics we cannot analyze the data.

Page 157 – Volume 1 (End of Paragraph 1)

*This can change local plant communities. In addition, it was common practice at one time to seed roads with nonnative species, such as smooth brome (Bromus inermis) or yellow blossom sweet clover (Melilotus officinalis). These species have had an effect on native grazing lands vegetation, at times replacing native grasses and forbs on specific sites.*

**Comment:** In our county we have seen those nonnative seeding’s as being positive to reduce erosion, supply forage and protect against invasive weeds and annual grasses. The nonnatives slowly give way to the native vegetation as it returns. Planting nonnatives is not a bad practice. Thought processes on these issues also need to evolve with the times.

Page 157– Volume 1 (End of Paragraph 4)

*This has led to the relatively recent recognition of the importance of maintaining open space as an important component of wildlife habitat, maintenance of native biodiversity, and for social*

*values offered by solitude. The open space offered by National Forest System lands becomes increasingly important, especially as private lands are developed for home sites*

**Comment:** This process can best be slowed by keeping economical ranch units viable. To do this permits on national forest lands need to stay and manageable in a fashion that rules and regulations don't become so intrusive that ranches can no longer afford to have an operation.

*Page 158 – Volume 1 (End of Paragraph 2)*

*At the same time, a continuation of fire suppression practices has exacerbated this situation. In the future, it is likely that political restrictions on forested vegetation management, combined with restrictions on the use of wildland fire, are likely to result in a continuation of overstocked and/or closed canopy stands. The exceptions will probably be limited to those areas where there is active forested vegetation management, including practices, such as periodic thinning. The long-term effect of this is a reduction in understory vegetation relative to what likely occurred prior to the 1900s with a continuing loss of forage production and wildlife habitat. In part this means that the true rangelands (e.g., grasslands, shrublands, etc.) carry more of the wildlife and permitted livestock forage harvest than should occur.*

**Comment:** The USFS is just admitting that it cannot do its job of good forest management and so the alternatives presented should be those that allow the USFS to actively manage so this paragraph won't have to be in the next Forest Plan Revision

*Page 225– Volume 1 (Paragraph 3)*

**Biological Soil Crusts** – *Biological soil crusts are critical for stabilizing the surface soil and trapping sediment in grazing lands, particularly in dry non-forested and dry forested grazing lands. Biological soil crusts also function as living mulch by retaining soil moisture and discouraging annual weed growth on moisture-limited sites (Belnap et al. 2001). Disturbances, such as livestock grazing, fire, areas of seasonally (winter and spring) intense wild ungulate use, natural erosion processes (specifically sheet erosion), and off road vehicle use, contribute to a complex mosaic of biological soil crust composition and abundance. Frequent or continuous disturbance from grazing keeps the biological soil crust communities at an early successional stage (USDA Forest Service 1999; Brooks 2009). The degree of degradation of soil crusts is related to soil type (specifically soil texture) and soil moisture.*

**Comment:** Why do you pick on grazing? You just listed the causes. Any of these causes would do the same thing. Livestock do not have some special power to disturb soils differently than other disturbances.

*Page 232 – Volume 1 (Paragraph 4)*

*Sites associated with land type associations determined to have poor suitability for grazing (i.e., greater than 40 percent.....*

**Comment:** Why 40%, you have been using 45%

*Page 269– Volume 1*

*Impacts of livestock grazing are often greater in riparian zones because these areas are used preferentially because of the availability of shade, water, and more succulent vegetation (Bryant 1982, Platts 1991). Brookshire et al. (2002) suggest that relatively light levels of livestock*

*grazing, combined with intense wild ungulate browsing, can affect plant structure and limit reproduction of riparian willows. Holechek et al. (2006) suggested that adverse effects of grazing could be avoided if use intensity, expressed as a percentage of long-term average forage production, did not exceed about 40 percent of forage produced in a given area. Elmore (1992) suggests that stream and riparian habitat conditions can be improved with proper grazing management.*

**Comment:** The 40% in Holecheck indicates safest management is 40%. His paper is a synthesis paper focusing on arid and semi-arid lands. The fact that it is focusing on a different ecological site and that it discusses this “safest method” which is the same attitude as zero risk management that the USFS has employed these past few years and this draft plan furthers with more restrictive rules is not appropriate for the basis for these forests. (Find different research for this.)

*Page 303– Volume 1*

*Wallowa-Whitman National Forest  
Effects of the alternatives are described on the following order:  
Differences between alternatives in the effects of grazing on riparian habitats*

*Page 315 – Volume 1 (End of Paragraph 3)*

*The results of this analysis show that alternatives with lower grazing use intensity (alternative C) would have more of a positive effect on watershed and riparian conditions than alternatives with higher grazing use intensity (alternatives B, D, E, F).*

*Page 34 - Volume 2*

***Active Restoration-Effects Common to All Alternatives***  
*The degree to which alternatives would result in watershed and riparian improvements through reduced livestock grazing in both riparian areas and uplands, and active restoration of roads and upland vegetation, will likely benefit aquatic species and their habitats through improved watershed function and natural disturbance processes that are closer to the long-term natural range of variation to which these species are adapted.*

*Page 48 - Volume 2 (End of Paragraph 2)*

*The effects of grazing on streams and aquatic species are well documented. Cattle and sheep can have negative effects when they are in streams, depositing excess nutrients and trampling spawning beds and stream banks. Grazing in riparian zones can reduce vegetation and tree recruitment, affecting stream temperature and sediment delivery via removal of shade and compacted soils (Platts 1991, Armour et al. 1994, Bohn and Kershner 2002).*

*Page 198 - Volume 2 (Paragraph 3)*

*However, alternative C would be likely to achieve historical conditions the fastest and would reduce the potential threat of negative effects to wildlife from domestic livestock grazing the most.*

**Comment:** Note, not all grazing is negative. The analyses in this document about the effects of grazing are an oversimplification and is contrary to the effects of good grazing. The degree of improvement is directly tied to amount of livestock grazing. This method is onerous and discounts all the proper grazing that is occurring on the landscape. This makes assumptions that grazing-use intensity is harmful when it

is up and beneficial when it is down. This is not true. Much science shows that grazing can and does occur and is not detrimental but good for the watershed. **(False assumption and should be removed and replaced with accurate statements.)** Grazing is a tool just like a hammer. When used correctly there is no harm and improvements are made. When used incorrectly it can have a negative impact.

The value of grazing includes the reduction of fine fuels that keeps the catastrophic fires from spreading at such a high rate, the "preconditioning of wildlife forage (renewing the growth of the plant which is preferred by most elk and deer.)

Page 31 - Volume 2 (Paragraph 2)

*Effects to riparian areas and aquatic habitats from livestock depend primarily on utilization standard. Relative effects to focal species and their habitats overall, are consistent with the comparison of alternatives for overall improved watershed condition and riparian and aquatic habitats.*

**Comment:** Wrong again. Effects are occurring, not a utilization standard, utilization is just a monitoring technique. Standards don't cause effects.

Page 48 - Volume 2 (Paragraph 3)

*Plan standards and guidelines for grazing in any of the action alternatives would require grazing to be managed in a way that would avoid redd trampling, and to be managed in ways that would move riparian and aquatic habitats towards desired conditions. While grazing may affect listed species or designated critical habitats, those effects may be reduced as grazing would be managed to meet and maintain desired conditions. Current management is already resulting in improving riparian and aquatic habitat trends (Archer et al. 2009), and this would be expected to continue under any of the action alternatives where AUM stocking levels are similar to or less than current stocking levels*

**Comment:** May be reduced? This is required by law and regulations. This paragraph points out that grazing must be managed so that redd trampling is avoided, effect on riparian areas are not causing damage to those areas, however, all analysis assumes that all grazing is bad and the more there is the worse it gets. These models need changed or replaced with real data and real science based assumptions and a new analysis needs conducted.

Page 52 - Volume 2 (Paragraph 4)

*The increased risks from activities with alternative D would be associated with roads, livestock management, timber/fuels management, and mining, and would also be potentially associated with other infrastructure-related management activities.*

**Comment:** Since we have so many different capacities and use numbers on both current and proposed grazing, we cannot analyze these types of statements until corrected numbers are available. The public comment period should stop and the plan withdrawn. After corrected numbers are available a complete new analysis will need to be done.

Page 58 - Volume 2 (Paragraph 5)

*Reduction in cumulative effects for bull trout populations and habitat from grazing may be more measurable for the Malheur and Wallowa-Whitman National Forests as more spawning and*

*rearing reaches are accessible and grazed currently in those allotments than are accessible and ..... (was this copied right?)*

**Comment:** But the grazing is not trampling redds and riparian conditions are improving in grazed situations so this statement again is biased and untrue and needs removed from the document.

*Page 197 - Volume 2*

*Livestock Grazing*

*Domestic livestock grazing directly competes with wildlife for the use of available forage. Grazing results in plant defoliation, mechanical changes to soil and plant material, and nutrient redistribution (Belsky and Blumenthal 1997).*

**Comment:** This publication was refuted by another publication, Borman, M.M. 2005, Forest stand dynamics and livestock grazing in historical context. Conservation Biology. Belsky's publication describes all the bad effects of grazing ignoring the changes in management over the past 100 years. Borman's publication describes that overgrazing a century ago the same as Belsky reports but those effects are not true in proper grazing of the current times.

*Page 211- Volume 2*

*All Forest Types: Medium/Large Trees*

*It is found in all potential vegetation groups and was chosen as a focal species to represent medium and large trees, but more specifically to represent the open-canopied forests with which other species in this group and family are also associated. The Cassin's finch has a negative association with grazing, as do other species it represents.*

**Comment:** This statement needs backed up. The finch nests in the high trees, and it likes open forest types. The proper grazing of today should not cause any concern for this bird. What evidence is there?

*Page 229 - Volume 2*

*Livestock Grazing*

*Three of the five studies found that Cassin's finch responded negatively to grazing (Page et al. 1978, Schulz and Leininger 1991, Taylor 1986), one found a neutral effect (Medin and Clary 1991), and one found a positive relationship (Mosconi and Hutto 1982). Knopf et al. (1988), Page et al. (1978), and Schulz and Leininger (1991) all reported a negative response from fox sparrows associated with cattle grazing.*

**Comment:** This shows a mixed outcome of grazing effect. The suggestion that the mere presence of cattle or grazing is causing the effect makes much less sense than the change in vegetative structure is an issue..

*Page 229 - Volume 2 (Last Paragraph)*

*A basic premise in the ranking of alternatives is that an improvement in rangeland health would, for the most part, result in an improvement of source habitat. Dietz (1975) pointed out that excessive removal of grass leaves would have an adverse effect on grass root development.*

**Comment:** Excessive removal -- with less than 50% utilization on only a part of the landscape would not be considered excessive removal.

Page 230 - Volume 2 (End of First Paragraph)

*Several studies (Hart et al. 1989, Hart et al. 1993, Herbel 1974, Hughes 1990, Pieper and Heitschmidt 1988, Van Poolen and Lacey 1979) indicate that stocking rate and utilization levels have more to do with successful range improvement than anything else. Other studies have indicated that heavy use (50-plus percent) at any time of the year, including the dormant season, is rarely compensated for by rest (Mueggler 1975, Sauer 1978, Snevea 1980, Trlica et al. 1977) with some plant species requiring more than six years to recover after heavy use. Because of this, those alternatives that propose low utilization levels are assumed to achieve the fastest range improvement*

**Comment:** Note the author skips from "heavy use" to "low use" and never discusses the moderate use that is the basis for today's grazing management. Another example of bias writing against grazing.

Page 230 - Volume 2 (End of Last Paragraph)

*This utilizes the assumption that by considering an even distribution across that landscape at all times, this would account for the number of elk that would be found on an allotment at any one time. An additional caveat is that only elk consumption was calculated, as they have the greatest dietary overlap with domestic livestock. Doubling the needs for elk to account for forage needs of other native ungulates, such as deer, which are more of a browser, would only result in a one percent change in the total percent utilization estimates displayed in table 313*

**Comment:** This methodology is as flawed as it gets. The elk and deer do not limit their grazing only to suitable acres. It seems you think they can read and follow directions.

Page 319 - Volume 3, Appendix B (paragraph 2)

***Livestock Grazing and Grazing Land Vegetation***

*Grazing land, especially riparian and wetland areas are subject to impacts from a wide variety of other uses and activities. The most critical of impacts come from roads (impacts to riparian/aquatic water relationships), large wild ungulates (impacts primarily to spring and fall rangelands), and fire (impacts from fire exclusion, wildfire/prescribed fire, and natural drought cycles).*

**Comment:** Need to include recreation. It is a large impact in some instances.

Page 329 – Draft Environmental Impact Statement – Volume 2, Chapter 3

*Baty et al. (1995) concluded that in the absence of human disturbance, both elk and deer would benefit from ponderosa pine restoration. As demonstrated in the management indicator species analysis for both deer and elk, habitat conditions for both species remains relatively stable, with slight increases in forage: alternative D creates the most and alternative C creates the least.*

**Comment:** Again, another resource area that shows the need for a more aggressive alternative than those shown in the DEIS.

Page 130 Volume 1, Chapter 3

*The desired conditions are defined by layers of management direction. A desired condition is identified where HRV objectives with the Public LURs definitions of satisfactory condition (i.e., fair range forage condition with an upward trend or better) are met by attaining a mid-seral ecological status with an upward trend or higher condition based on the PNC, and recognizes that some communities have been altered, changing the PNC. Where ecological sites in state A are managed to maintain their current state, and ecological sites in states B and C*

**Comment:** The new forest plan makes no commitment or even goal to commit to the multiple use concept by supplying forage to domestic livestock. In the current 1990 forest plan the goal is to ensure that the basic needs of the forage and soil resources are met. To make available forage production above that needed for maintenance or improvement of the basic resources, to wildlife and permitted domestic livestock. Satisfactory range condition is determined by allotment classification and/or forage condition. (Chapter 4/page 51/52). It is further defined in the glossary. In the glossary it states: Satisfactory range conditions – on suitable range forage condition is at least fair, with stable trend, and allotment in not classified PC (basic resource damage) or PD (other resource damage. PC/PD identify the issues of water temperature, bank instability, gully development or soil condition as issues of AND livestock use on the allotment is or has been a major factor contributing to the condition.

The Management direction in the revision has been changed from seeing land management from a production standpoint to land management from an ecological perspective and is focused on range condition and management of livestock grazing in regards to interaction with other important resources. This shift identifies a desired condition for grassland vegetation that ensures continued ecological function and sustainability of native ecosystems. This philosophy directs managers to maintain and/or restore the ecological status of grassland communities in relation to the respective Potential Natural Community (PNC) recognizing their Historic Range of Variability (HRV) and that the potential for some communities may be altered by past land uses. In other words, setting the baseline as the plant community would be present if there were no human caused disturbances to consider. It is important to note that natural disturbances are inherent in the development of PNC. Seral stages are used to quantify or represent the current departure of a specific site from the PNC for that site.

This shift in philosophy puts all of the historical range improvement seedings as unsatisfactory range conditions because the focus is on “natural” not productive or functioning or multiple use. The switch to the ecological basis is unacceptable if it does not include acknowledgement and acceptance, in fact support for a properly functioning (not the PFC assessment) watershed that produces forage and supports the livestock industry. Additionally the current forest plan statement acknowledging that if conditions of concern are not livestock use related that those conditions would not make the area unsatisfactory must be included.

*Vol 3 p. 306*

*MA 4B RMA-HYD-1 S-56*

**Standard** *Authorizations for all new and existing special uses, including, but not limited to water diversion or transmission facilities (e.g., pipelines and ditches), energy transmission lines, roads, hydroelectric, and other surface water development proposals, shall result in the reestablishment, restoration, or mitigation of habitat conditions and ecological processes identified as being essential for the maintenance or improvement of habitat conditions for fish, water and other riparian dependent*



- on the Malheur
- *Volume 1, Page 296* Key indicators Existing AUMs for cattle and sheep
- combined are currently 37,800 for Umatilla
- *Volume 1, Page 307 - last paragraph* Allowable AUMs for cattle and sheep
- combined are currently 81,500 (alternative A) Wallowa Whitman National Forest
- *Volume 1, Page 307 - last Paragraph* and 80,500 in alternatives E and F Proposed
- *Volume 3, page 255 Table A-53* Cattle and sheep grazing AUMs B-109,000  
C- 29,500 D-84,500 E&F 80,500

**Comment:** The discussion on AUM use throughout the document of the forest plan is confusing and cannot be followed. They discuss having 80,000 AUMS in the future but only 90,000 now. Yet in previous plan we had 227,000. They talk of supplying 3% of the local forage which makes even less sense. There needs to be some consistency here.

*Page 107- Draft Plan*

*Table 26. Objectives and associated desired conditions for each national forest*

<i>Objective Statements</i>	<i>Malheur</i>	<i>Umatilla</i>	<i>Wallowa-Whitman</i>
<i>3.3 Goods and Services</i>			
<i>Contribute to local economies by providing forage for cattle and sheep.</i>	<i>123,500 AUMs (annually)</i>	<i>35,800 AUMs annually</i>	<i>80,500 AUMs (annually)</i>

*Page v – Volume 1*

***Table S-4. Issues and key indicators for each alternative for the Wallowa-Whitman National Forest***

<i>Permitted animal unit months (cattle)</i>	<i>77,000</i>	<i>74,000</i>	<i>26,000</i>	<i>80,000</i>	<i>77,000</i>	<i>77,000</i>
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*Page 113– Volume 1*

***Table 57. Estimated cattle and sheep permitted animal unit months (AUMs) by alternative***

<i>National Forest</i>	<i>Estimated Cattle AUMs (permitted)</i>					
	<i>Alt. A</i>	<i>Alt. B</i>	<i>Alt. C</i>	<i>Alt. D</i>	<i>Alt. E</i>	<i>Alt. F</i>
<i>MAL</i>	<i>117,000</i>	<i>120,000</i>	<i>61,000</i>	<i>119,000</i>	<i>117,000</i>	<i>117,000</i>
<i>UMA</i>	<i>30,000</i>	<i>31,000</i>	<i>3,000</i>	<i>30,000</i>	<i>30,000</i>	<i>30,000</i>
<i>WAW</i>	<i>77,000</i>	<i>74,000</i>	<i>26,000</i>	<i>80,000</i>	<i>77,000</i>	<i>77,000</i>

*Page 130 – Volume 1 (Paragraph 4)*

*In order to provide context, especially for the economic and well-being section of this document, the total animal unit months (AUMs) available for each alternative must be estimated. For a variety of reasons, AUMs can vary on an annual basis, as well as by forest. For this reason, the*

number of livestock permitted between 2007 and 2009 was averaged for each forest and then divided by the number of suitable acres within active allotments in 2010 to obtain an average AUM per suitable acre. This was then used to estimate the number of livestock AUMs for each alternative, including alternative A to allow unbiased comparison between alternatives.

Page 153 – Volume 1

**Alternative E and F**

Overall, the permitted cattle AUMs would remain approximately the same and any actual modifications to management and stocking would be dependent on the outcome of project-level planning and decisions.

**Comment:** This is inconsistent with many of the various numbers you have been throwing around from 77,000 to 119,000 for WWNF.

Page 270 – Volume 1

Animal unit months (AUMs) totaled about 290,000 for the three national forests in 2009, an average of about 34 acres per AUM. Some livestock grazing occurs within 455 of 552 subwatersheds within National Forest System lands in the Blue Mountains. In order to evaluate relative levels of livestock use within the national forests, available estimates of forage production by vegetation type from Countryman and Justice (2010) were compared to forage use based on stocking levels as of 2009. Use intensity was then compared to use categories by Holechek (2006) who suggested that good range conditions could be maintained with average forage use of 40 percent or less of forage production. Results indicate that average livestock forage use across all three national forests averages about 13 percent of forage production.

**Comment:** These AUM numbers keep changing. These numbers jump around so much that we need to have the real numbers in context. When the numbers are fixed, we will need to respond to the intended and unintended consequences.

**Comment:** This is less than what is currently being grazed in Wallowa County yet you keep saying that there is not an expected reduction in AUMs from this plan.

Page 141 – Volume 1

Table 87 displays the existing permitted AUMs by national forest. This numbers reflects how many head of livestock are permitted on the combined allotments.

**Comment:** These two statements contradict themselves. One is total cattle permitted and other includes the months and time they spend out there.

Page 125– Volume 1

**Table 78. Total jobs and income supported by national forest activities and programs by alternative for the Wallowa-Whitman socio-economic impact zone**  
*e 78. Total jobs and income supported by national forest activities and programs by alternative*

Activity	Estimated Employment Contribution (direct, indirect, and induced)					
	Alt. A	Alt. B	Alt. C	Alt. D	Alt. E	Alt. F

<i>Recreation</i>	397	397	397	397	397	397
<i>Range</i>	258	242	102	267	258	258

**Comment:** No decrease in Estimated Employment yet AUM's are being decreased by 1/3. Another example of not having any rational numbers in grazing to analyze.

## Range - Endangered Species Act

### SPAULDING'S CATCHFLY

*Page 120– Draft Plan*

***Plant Species (Federally Listed and Species at Risk)***

*Spalding's catch-fly (Silene spaldingii)*

*(standards apply only to the Umatilla and Wallowa-Whitman National Forests)*

*PL-TES-1 New*

***Standard***

*Livestock grazing shall not be authorized or allowed during the Silene spaldingii active growth period (generally between May 15 and August 30) in pastures that exhibit low departure from the desired condition, unless the grazing management history demonstrates that livestock avoid Silene spaldingii occupied habitat.*

*PL-TES-2 New*

***Standard***

*Livestock grazing shall not be authorized or allowed in pastures occupied by Silene Spaldingii that exhibit moderate or greater departure from desired condition.*

*Page 350 - Volume 2 (Paragraph 2)*

*These standards would ensure that Spalding's catchfly would not be grazed or trampled and that occupied habitat in moderate or greater departure from the upland grassland*

**Comments:**

1. *PL-TES-1* is a standard that allows no grazing in a whole pasture that has catchfly in it even though we have a guideline that says stay away from ESA plants if possible. This is way too strict of a standard for a plant that grows and thrives following disturbance. The whole pasture should not be protected and the standard should be that the core population should be monitored intensively and if showing a decline due to grazing that then the grazing needs to change.
2. *PL-TES-1/PL-TES-2* Timing restrictions severely limit the flexibility to responsibly manage the range resource as whole, this time period constitutes 5 out of the 7 months that is the grazing season on most general forest management areas. This is also in direct conflict with pastures that

have riparian areas that need special consideration and should be grazed earlier in the season before the weather is hot and they create conflict with being able to utilize pastures where there is Spalding's catchfly AND potential timing restrictions for TES fish spawning (steelhead no cattle entry prior to 7/15, and chinook/bull trout no entry after 8/15). This means if there is a pasture with catchfly, steelhead, and chinook or bull trout spawning – there is NO time in which that pasture can be used without extensive and costly fencing.

3. PL-TES-2 does not just limit grazing in occupied habitat, it bars grazing in that whole pasture, which is sometimes 1,000's of acres.
4. There is no proof, not backed by research, which demonstrates removing grazing during the growing season for Spalding's catchfly will increase the population of the plant, therefore these standards should not be considered an truly effective conservation measure.
5. "Pastures that exhibit low departure" is not defined. This opens it up to personal bias and interpretation and this document is a prime example that there is significant bias in this plan.
6. This is being done by whole pastures. No exceptions. At a minimum grazing should be allowed in these pastures unless it can be shown that livestock grazing is harming the plant.
7. These standards essentially close pastures with Spalding's catchfly and unsatisfactory range condition (even in part) to grazing. This is not acceptable, nor does it guarantee that no grazing would improve Spalding's catchfly population or habitat. Pastures can be large and complex, and combine areas of satisfactory and unsatisfactory range condition; this has potential to significantly reduce the amount of useable area within an allotment depending on the allotment. Or this would constitute significant fencing to separate areas with catchfly that have unsatisfactory range condition to be able to make the allotment workable. This can also alter/upset in place rotations aimed at improving range condition over time. There are rangelands in phase D that have crossed a threshold that having or removing grazing would have a neutral impact, and therefore removing grazing would not accelerate restoration of habitat for Spalding's. However, this suggests that if there are rangelands in phase D they would not be used. **A more reasonable solution would be to analyze the pasture on an allotment by allotment and pasture by pasture specific basis to determine what the best options are managing to conserve and protect Spalding's catchfly.** This topic should be addressed at the project level and through formal consultation, this is too prescriptive for the Forest Plan,
8. Given the characteristics of the plant that it does not express itself annually, a long term population study (10-20 years) would be the only appropriate way to determine if management changes are positive. A more reasonable approach while studying the plant population, depending on the pasture, would be to put up temporary fencing around the Spalding's catchfly occurrences, ensure that salting / trailing / new water developments / fences / gates and other features on the landscape that would concentrate livestock use be placed well away from known occurrences of the plant. Or practice grazing that does not graze the same pasture at the same time of year, particularly during the Spalding's catchfly active growing season. This can be decided on at the project level, where this type of prescription regarding grazing is the most appropriate given it would be site specific.

*Spalding's catchfly is endemic to the Palouse region of southeastern Washington and adjacent Oregon and Idaho, and is disjunct in northwestern Montana and British Columbia, Canada. Spalding's catchfly is found predominantly in the Pacific Northwest bunchgrass grasslands and sagebrush-steppe and occasionally in open-canopy pine stands. Occupied habitat is in five physiographic regions: (1) the Palouse Grasslands in west-central Idaho and southeastern Washington, (2) the Channeled Scablands in east-central Washington, (3) the Blue Mountains Basins in northeastern Oregon, (4) the Canyon Grasslands along major river systems in Idaho, Oregon, and Washington, and (5) the Intermontane Valleys of northwestern Montana and British Columbia, Canada. Spalding's catchfly was listed as a threatened species under the Endangered Species Act October 10, 2001.*

*I agree with the comment below however I don't know what numbers need to be updated??????*

**Comment:** Plant biologists should be consulted and utilized to write current conditions and the current numbers of findings. This should include the expanded locations and the expanded number of plants in the known locations. It seems that just a few locations will be affected and in reality many pastures in the county will be affected.

*Page 349 - Volume 2 (End of Paragraph 2)*

*Sufficient research has not been completed to discern what levels of grazing may allow the Spalding's catchfly to persist (USDI 2007).*

**Comment:** In Lower Imnaha Range Analysis the concern was for shearing of the plants due to trampling in deep soils. This seems to be much more general. Should get more specific for sites (north slopes, deep soil, etc.)

*Page 350 - Volume 2 (End of Paragraph 1)*

*Therefore, grazing utilization of 50 percent within Spalding's catchfly populations and surrounding habitat would not likely contribute toward maintaining bumblebee populations, Draft Environmental Impact Statement – Volume 2, Chapter 3 Proposed Revised Land Management Plans 350 for the Blue Mountains National Forests thereby limiting Spalding's catchfly reproduction. Kimoto (2010) found that even moderate grazing (22 to 40 percent utilization) led to bumblebee declines*

**Comment:** Where are these studies done, in forested lands or in pure grass lands. The pollinators in the forest should not be affected nearly as much as the pure grasslands.

*Page 351 - Volume 2 (Paragraph 1)*

*The forest plan would address this concern by incorporating standards from the 2005 Record of Decision for the Preventing and Managing Invasive Plants FEIS. The 2005 plan standard (number 20) directs invasive plant treatments to be designed to minimize or eliminate adverse effects to species or habitats proposed or listed under the Endangered Species Act.*

**Comment:** Why do the authors keep pointing out that illegal actions are detrimental to the plant and then insinuate that it shouldn't be done by rule. It is highly illegal to spray an endangered species with an herbicide. It shouldn't be a threat any more than identifying that if we dig them up and burn them it will be harmful.

## Range - Sheep

**Comment:** There is much science that offers many alternative discussions about domestic sheep grazing and bighorn sheep grazing available. Your selection of referencing Foreyt, an author that was a major supporter of the wildlife/bighorn issues and not supportive of the domestic sheep industry, is biased.

**Comment:** Using Gregory and Bisson from 1997 shows the intentional bias since so much better, more valid and extensive research has been conducted and published since 1999.

Page 16 – Draft Plan - Paragraph 1

### ***Grazing***

*Livestock grazing (cattle and sheep) within the national forests supports traditional lifestyles and local economies. It also has the potential to impact the condition of National Forest System resources, especially grasslands, shrublands, and riparian areas. This potential impact can affect habitat necessary for terrestrial and aquatic animal species. Contact between permitted domestic sheep and bighorn sheep has led to disease transmission, which has had a substantial impact on bighorn sheep populations in the area.*

**Comment:** “Is suspected to have caused”. It is not a scientific certainty that big horns contact the disease from the domestic sheep. There are as many scientists that are not convinced that the big horn die-offs are caused by the disease transmission from the domestic sheep.

Page 126–Draft Plan

RNG-13 New

### ***Guideline***

*Trailing of domestic sheep or goats should not be authorized or allowed within 7 miles of bighorn sheep home ranges.*

Page 152 – Volume 1 (Bottom of Page)

***Alternative B*** *Guideline of trailing of domestic sheep or goats should not be authorized or allowed within 7 miles of bighorn sheep home ranges.*

RNG-18 New

### ***Standard***

*Implement emergency actions when bighorn sheep presence is detected within 7 miles of active domestic sheep or goat grazing or trailing. Actions to be taken shall ensure separation between bighorn sheep and domestic sheep or goats.*

RNG-19 New

### ***Guideline***

*To maintain separation, when bighorn sheep are found within 7 miles of an active domestic sheep and goat allotment, implementation of emergency actions for domestic sheep and goat grazing could*

*include:*

*Reroute (move) domestic sheep or goats to a new routing path that will take them away from the likely bighorn movement; this may involve rerouting within the permitted allotment, movement to a different allotment, or, if the situation cannot otherwise be resolved, moving the permitted sheep off of the national forest until the situation can be resolved*

*Inform the appropriate state agency of the bighorn sheep location*

**Comment:** We should be able to graze domestic sheep long as there is separation and we monitor that separation. We should not have to change our grazing as long as that monitoring finds no contact (30 meters). You should eliminate the 7 miles away before trailing (guideline Rng 13), the implementation of emergency plan when within 7 miles (standard Rng 18) and maintaining separation guideline (guideline Rng 19). These statements should be consistent with allowing domestic sheep grazing as long as effective separation is occurring. Newer research\* has shown that with as little as 30 meters separation the big horn sheep do not acquire the disease and die. Seven miles is not needed and should be removed from the plan.

Lawrence, P., S. Shanthalingam, R Dassanayake, R. Subramaniam, C. Herndon, D. Knowles, F. Rurangirwa, W. Foreyt, G. Wayman, A. Marciel, S. Highlander, S. Srikumaran. 2010. Transmission of *Mannheimia Haemolytica* from Domestic sheep (*Ovis Aries*) to Bighorn Sheep (*ovis canadensis*): Unequivocal Demonstration with Green Fluorescent Protein-tagged Organisms.

**2010.** *Journal of Wildlife Diseases*, 46(3), 2010. pp. 706-717

*Page 127 – Draft Plan*

*RNG-14 New*

***Standard***

*When effective monitoring has not been conducted for bighorn sheep presence, domestic sheep or goat grazing shall not be authorized.*

**Comment:** Because the state fails to monitor for bighorns should not be reason to force the permittees to lose “authorized grazing” on his permit

*RNG-17 New*

***Standard***

*Authorized domestic sheep or goats shall be individually marked in a manner that allows immediate identification of ownership at a distance during the grazing season at all times while on NFS lands.*

**Comment:** Sheep producers use ear tags and paint branding in their normal management activities. These methods of identification should be acceptable for this standard.

**Table 91. Wallowa-Whitman National Forest livestock grazing indicators for each alternative**

<b>Indicator</b>	<b>Alt. A</b>	<b>Alt. B</b>	<b>Alt. C</b>	<b>Alt. D</b>	<b>Alt. E</b>	<b>Alt. F</b>
<i>Acres suitable for permitted cattle grazing in active allotments</i>	408,000	393,000	135,000	422,000	408,000	408,000
<i>Acres suitable for permitted sheep grazing in active allotments</i>	25,000	22,000	22,000	25,000	25,000	25,000
<i>Permitted animal unit months (cattle)</i>	77,000	74,000	26,000	80,000	77,000	77,000
<i>Permitted animal unit months (sheep)</i>	4,500	3,500	3,500	4,500	3,500	3,500

**Comment:** If no acres are eliminated from current levels then why the AUM reduction for sheep in alternative E and F?

**Issue 3: Livestock grazing and grazing land vegetation (Wallowa-Whitman NF)**

Permitted animal unit months (sheep) 4,500 3,500 3,500 4,500 3,500

**Comment:** You have reduced the AUMS’s in the plan with no reduction in acres grazed, this should not occur.

**Alternative E and F**

*Suitable acres for sheep would be slightly reduced to minimize the risk of potential disease transmission from domestic sheep to bighorn sheep.*

**Comment:** Where? Inconsistent with tables.

**Table 315. Crosswalk of bighorn sheep herd names from state agencies and the Payette National Forest analysis within the Blue Mountains forest plan revision analysis effort1**

Upper Joseph Canyon      Oregon      Black Butte/Red Bird      WAW

**Comment:** Does this exist? I have not heard of it. It should be removed from the plan.

**Range – Utilization**

## General Comment

In analyzing the proposed utilization standards it first should be noted that the proposed standards are not based on ecological needs, nor are they based on the phonological needs of the various plants. They are based on what fish swims in the waters of the various watersheds. This forest plan spends extensive amount of space discussing the need for “desired condition”, defines current condition and then attaches actions and limits to move the current condition to desired condition. By basing the utilization standards for grazing of perennial plants in the terraces and uplands to the type of fish in the stream makes no sense. The utilization standards for grazing should be tied to the desired condition which we can assume is a functioning watershed and riparian areas. If this is the desired condition then site specific goals and outcomes need to be identified within a very broad range of guidelines or standards in the forest plan. Those site specific targets should not be in a forest plan at all. The desired condition should be in the plan.

If assumptions are made that utilization standards will be part of the forest plan for alternative reasons other than to manage for fully functioning, healthy watersheds then the following information should guide the setting of those guidelines (should not be standards).

J. Wayne Burkhardt wrote in *Rangelands* 19(3), June 1997. As interest and concern about the environment and public lands has markedly increased in recent years, there has been an increasing effort to manage livestock grazing on the basis of utilization standards or limits.

This deceptively simple concept has become popular with environmental reformers opposed to public land grazing and with agency administrators caught up in the political crossfire of land use reform. Grazing use levels or "proper use factors" have long been part of the "tools" used by rangeland managers. Recently though, the tendency has been to base grazing management decisions solely on achieving predetermined use levels at "key sites" on pastures or allotments. This approach may provide simple and efficient "grazing administration" but it does not result in effective grazing management.

He ends this article by stating: The across-the-board application of conservative use standards to public land grazing is poor resource management and poor public policy. It puts the public land grazing permittees in an impossible position, reduces management agencies to policing operations and gives the radical environmentalists a wonderful tool to beat up the agencies and the ranchers. It is poor public policy that puts renewable resources off limits to the production of food and fiber and shifts that production to non-renewable resource based technology.

Bill Krueger wrote in *Stubble Height and Utilization Measurements: Uses and Misuses*, May 1998, “The most prominent area of agreement was that utilization is a land management tool, not a land management objective”.

In another part of the paper it states: “Another concern about the accuracy and use of utilization data is that often the personnel using the methods are inadequately trained.”

The University of Idaho Study on Stubble Height is states: “Clary and Leininger (2000) proposed a 10 cm (4 in) residual stubble height as a “starting point for improved riparian grazing management.” However, they acknowledged that in some instances, 7 cm ( 2.75 in) may provide adequate riparian protection and in others 15 to 20 cm (6 to 8 in) may be required to limit stream bank trampling or to reduce willow browsing. The criteria could vary depending upon local environmental variables, condition and trend of the stream, species composition on the greenline and the season, frequency and duration of livestock use. Thus, stubble height criteria not only can but should be adjusted through adaptive management, based on riparian conditions and trend (*see Process for Adaptive Management*).

This comes into the conversation as stubble heights are based on height weight curves and set on desired percent utilization.

McLean, A. & S. Wikeem in a JRM paper titled: "Influence of season and intensity of defoliation on bluebunch wheatgrass survival and vigor in southern British Columbia". (*Journal of Range Management*, 28 (1), 21-26.), they showed that with Bluebunch wheatgrass the most damage occurring with spring defoliation to a stubble height of 5 cm. Spring defoliation leaving 10-15 cm showed less damage. Fall defoliation to a stubble height of 5 cm and season-long grazing to a height of 20 cm showed no damage. Indicating that not all grazing intensities have the same effect and that basing utilization limits based on what fish was in the stream makes no sense.

Bluebunch wheatgrass is generally the most sensitive species to grazing intensity, therefore looking at these numbers even Bluebunch wheatgrass can be grazed at 10 cm successfully in most instances. Rotational grazing the management by range professionals need a place in this forest plan.

In a different papers by Richards and Caldwell (1985) and Busso et al (1990) point out "Synchronous tiller development increases the susceptibility of bunchgrasses to a greater loss of active shoot meristems when grazed after internode elongation. This also contributes to wide variations in grazing tolerance with the progression of phenological plan development. For example, the grazing sensitive bluebunch wheatgrass is quite tolerant of defoliation in the early spring when culmless, because active intercalary and apical meristems are located at or below ground level. However, defoliation tolerance decreases rapidly following internode elongation.

#### Bibliography:

J. Wayne Burkhardt. Grazing Utilization Limits: An Ineffective Management Tool. *Rangelands* 19(3), June 1997.

This paper in *Rangelands* describes the concerns of using Utilization as the basis for livestock grazing management on public lands.

SB 682-E

May 1998

Rod Heitschmidt, Kenneth D. Sanders, E. Lamar Smith, W.A. Laycock, G. Allen Rasmussen, Quentin D. Skinner, Federick C. Hall, Richard Lindenmuth, Larry W. Van Tassell, James W. Richardson, Robert R. Fletcher, George W. Borden, Thomas R. Harris, David T. Taylor, Brett R. Moline, and William C. Krueger. Stubble Height and Utilization Measurements: Uses and Misuses. Bulletin WCC-40, USDA Agricultural Research Service, Ft. Keogh Livestock and Range Research Laboratory, Miles City, MT 59301.

This bulletin contains the papers from a symposium in February 1997 at the 50th annual meeting of the Society for Range Management, in Rapid City, SD. The symposium provided a venue for discussing the pros and cons of using utilization estimates as the primary source of information for managing grazing lands, particularly indigenous rangelands. The impetus was the belief of the members of the two sponsoring Western Coordinating Committees, WCC-40 (Rangeland Ecological Research and Assessment) and WCC-55 (Rangeland Resource Economics and Policy), that utilization estimates often are used incorrectly in making rangeland management decisions. Although the committees believe that utilization estimates can serve as important information on which rangeland management strategies and tactics can be based, we believe such estimates often are either inaccurate or easily misconstrued and misused.

University of Idaho Stubble Height Study Report. By: University of Idaho Stubble Height Review Team. July 2004.

A team of scientists, land management agency specialists and ranchers was formed in the late summer of 2003 to review the use of stubble height and make recommendations on its use to the Bureau of Land Management and U.S. Forest Service. This is the final report of the study team to Mr. Bennett and Mr. Troyer.

Borman, M.M., Massingill, C.R. and Elmore, E.W. 1999. Riparian area responses to changes in management. *Rangelands*, 21(3): 3-7.

“Results from this study and from observations of numerous grazing management prescriptions evaluated at other locations in the west suggest that grazing can often be compatible with improving deteriorated riparian conditions and with maintaining those functioning properly (Ehrhart and Hansen 1997, 1998; Masters et al. 1996a, 1996b; Mosley et al. 1997). The key is an appropriate grazing prescription, which must be site and situation specific, and adherence to that prescription.”

Pieper, R.D. (1994). Ecological implications of livestock grazing. in: M. Vavra, W.A. Laycock, & R.D. Pieper (Eds.), *Ecological implications of livestock herbivory in the West* (pp. 177-211). Society for Range Management. \*\*

“It has been hypothesized that the highest levels of species richness occur in areas with intermediate levels of disturbance. Therefore, moderate livestock grazing may contribute to higher levels of species richness over no grazing or overgrazing. At what level of species richness or composition the rangeland is healthiest is in the eye of the beholder. Different beneficial uses are optimized with different characteristics or seral stages.”

McLean, A. & S. Wikeem. (1985). Influence of season and intensity of defoliation on bluebunch wheatgrass survival and vigor in southern British Columbia. *Journal of Range Management*, 28 (1), 21-26. \*\*\*

This study took place in southern British Columbia. It looked at the response of bluebunch wheatgrass to defoliation in two different land types: lower grasslands or big sagebrush bluebunch wheatgrass zone and the upper grassland or bluebunch wheatgrass rough fescue zone. The lower zone is approximately 970 feet in elevation, has 1-3% slope, average annual rainfall of 9.4 inches, and sandy loam soils. The upper zone is approximately 3,650 feet in elevation, has a 5% slope, average annual rainfall of 12 inches, and sandy loam soils. Both rangelands were in good-excellent condition.

The study recorded the response to different times, frequencies, and intensities of defoliation. Plant survival and vigor was recorded in the summer following defoliation. This study showed the most damage occurring with spring defoliation to a stubble height of 5 cm. Spring defoliation leaving 10-15 cm showed less damage. Fall defoliation to a stubble height of 5 cm and season-long grazing to a height of 20 cm showed no damage.

*With specific areas of concern remaining, many riparian areas and wetlands have improved relative to reference conditions (and relative to the early 1900s). It is believed that recovery is continuing at a relatively slow but steady rate.*

*Page 139 – Draft Environmental Impact Statement – Volume 1, Chapter 3*

*In general, with proper management as prescribed through the standards and guidelines of all alternatives, it is possible to ensure that across the landscape of an allotment, most sites will be in phases A or B with some in phase C. In some cases, there will be residual phase D sites that remain from historic impacts but it is highly unlikely that additional phase D sites will be created relative to and under proper livestock management. Overall, all alternatives are expected to result in a mosaic of phases A or B and phase C sites scattered across the allotment landscape.*

**Comment:** Acknowledgement that proper livestock management has improved and is continuing to improve range conditions.

*Page 152- Draft Environmental Impact Statement – Volume1, Chapter 3*

#### ***Alternative D***

*This alternative includes the vacant allotments in the suitable land base. Completing the Rescission Act schedule for range AMP NEPA would potentially alter acres and percent of suitable grazing land if vacant allotments or portions of the vacant allotments are determined to be unsuitable. This analysis and subsequent decision regarding actual suitable acres of the vacant allotments would be done at the project level*

**Comment:** To help reduce flash fuels and noxious weeds, the need is to maximize the acres grazed.

*Page 156- Draft Environmental Impact Statement – Volume1, Chapter 3*

#### ***Large Wild Ungulates***

*During the past century-and-a-half or so, there have been significant changes in both the species and the population of large wild ungulates, such as deer, elk, and wild horses. Some changes have been a result of human decisions designed to increase populations of deer and elk. At times these actions worked too well with the effect that the population exceeded grazing capacity with negative and lasting impacts to the vegetation (and sometimes to the soils) in certain geographic areas. This has been demonstrated through the use of upland exclosures.*

*Page 158- Draft Environmental Impact Statement – Volume1, Chapter 3*

*More recently, forested vegetation management has moved to a longer-term focus of healthy forestlands, but there is a huge backlog of overstocked stands with little or highly altered understory herbaceous and shrubby vegetation. At the same time, a continuation of fire suppression practices has exacerbated this situation. In the future, it is likely that political restrictions on forested vegetation management, combined with restrictions on the use of wildland fire, are likely to result in a continuation of overstocked and/or closed canopy stands. The exceptions will probably be limited to those areas where there is active forested vegetation management, including practices, such as periodic thinning. The long-term effect*

of this is a reduction in understory vegetation relative to what likely occurred prior to the 1900s with a continuing loss of forage production and wildlife habitat. In part this means that the true rangelands (e.g., grasslands, shrublands, etc.) carry more of the wildlife and permitted livestock forage harvest than should occur.

**Comment:** The above two excerpts tie together. With the lack of forage of any kind in USDA Forest Service timber lands, the large wild ungulates have moved to the managed private land and remove forage that the private landowner should have available for domestic livestock. Again, a more aggressive alternative is needed to increase forage on the public land.

Page 309 (second paragraph) - Draft Environmental Impact Statement - Volume 1

.....the exception that utilization limits would be lower in watersheds inhabited by bull trout, and alternative F would have slightly lower utilization limits in watersheds inhabited by anadromous fish. The stricter guidelines in alternatives E and F would apply in 53 subwatersheds containing bull trout (640,000 acres, 36 percent of forest area) and 88 subwatersheds inhabited by anadromous salmon or steelhead (905,000 acres, 50 percent of forest area).

**Comment:** These two restrictions are devastating to the cattle producers. They are also unnecessary. We are currently meeting the standards of riparian areas and conditions are improving in most areas. Where they are not improving site specific management can change that situation. There is no scientific support for these limitations.

Page 230 - Draft Environmental Impact Statement – Volume 2, Chapter 3

**Table 312. Percent maximum utilization levels proposed for upland habitats with moderate to low departure from HRV by alternative and national forest**

<b>National Forest</b>	<b>Alt. A</b>	<b>Alt. B</b>	<b>Alt. C</b>	<b>Alt. D</b>	<b>Alt. E</b>	<b>Alt. F</b>
Malheur	50-60	35-55	30	45-50	35-40	35-40
Umatilla	50-60	35-55	30	45-50	35-40	35-40
Wallowa-Whitman	50-60	35-55	30	45-50	35-40	35-40

Page 125 – Draft Plan – Paragraph 1

**Maximum Percent Utilization**

**Departure from Desired Condition (guideline)**

**Low to Moderate**

**Moderate or Greater**

Season long	35%	30%
Management systems that incorporate deferment, rest, rotation	40%	35%

Page 141 – Draft Plan

**Guideline**

The following displays the maximum utilization guidelines for riparian management areas.

**Measure**

**Maximum utilization within riparian management areas\***

Maximum percent utilization of woody vegetation (percent of mean annual vegetative production)

25% in bull trout spawning and rearing habitat (all three national forests)  
 35% in anadromous fish reaches (UMA and WAW)  
 40% outside bull trout spawning and rearing habitat (MAL)  
 40% outside anadromous fish reaches (UMA and WAW)

Maximum percent utilization of herbaceous vegetation (percent of mean annual vegetative production)

25% in bull trout spawning and rearing habitat (all three national forests)  
 35% in anadromous fish reaches (UMA and WAW)  
 40% outside bull trout spawning and rearing habitat (MAL)  
 40% outside anadromous fish reaches (UMA and WAW)

\* In addition, the minimum residual stubble height applies at the greenline (4 to 6 inches). The maximum bank alteration is 20 percent.

Page 133 – Volume 1 (Paragraph 6)

Although both E and F follow the guidelines of the Aquatic and Riparian Conservation Strategy alternative E incorporates a utilization guideline within riparian management areas of 25 percent on both herbaceous and woody vegetation within bull trout watersheds and 40 percent in all other watersheds.

Page 134 – Volume 1

**Table 83. Maximum utilization within riparian management areas\***

<b>Measure</b>	<b>Alt. B</b>	<b>Alt</b>	<b>Alt. D</b>	<b>Alt. E</b>	<b>Alt. F</b>
Maximum percent utilization of woody vegetation (percent of mean annual vegetative production)	40%	25%	40%	25% within bull trout spawning and rearing reaches 40% for all other watercourses including anadromous fish reaches	30% in bull trout spawning and rearing habitat (all three national forests) 35% in anadromous fish reaches (UMA and WAW) 40% outside bull trout spawning and rearing habitat (MAL) 40% outside anadromous fish reaches (UMA and WAW)

Maximum percent utilization of herbaceous vegetation (percent of mean annual vegetative production)	40%	10%	40%	25% within bull trout spawning and rearing reaches 40% for all other watercourses including anadromous fish reaches	30% in bull trout spawning and rearing habitat (all three national forests) 35% in anadromous fish reaches (UMA and WAW) 40% outside bull trout spawning and rearing habitat (MAL) 40% outside anadromous fish reaches (UMA and WAW)
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Page 146 – Volume 1 (Paragraph 4)

Holechek (2000) described conservative utilization as 31 to 40 percent and moderate as 41 to 50 percent and believed that managers should avoid heavy grazing (exceeding 50 percent). Holechek (2006) more recently concluded that in arid and semiarid areas, grazing can have positive impacts on forage plants compared to exclusion if average long-term use levels do not exceed 40 percent.

Page 273 - Volume 3, Appendix A

RNG-5

Alt. B Departure from Desired Condition (guideline)		Alt. C Departure from Desired Condition (standard)		Alt. D Departure from Desired Condition (guideline)		Alt. E and F Departure from Desired Condition (guideline)	
Low	Moderate or Greater	Low	Moderate or Greater	Low	Moderate or Greater	Low	Moderate or Greater
55%	35%	30%	30%	50%	45%	40%	35%

Page 273 - Volume 3, Appendix A

RNG-6 G-47

Alt B Guideline: Upland shrub utilization should not exceed 45 percent as determined by any science-based method.

Alt C Standard: Upland shrub utilization shall not exceed 25 percent as determined by any science-based method.

Alt D This alternative has no corresponding standard or guideline.

Alt EF Guideline: Upland shrub utilization should not exceed 40 percent as determined by any science-based method.

Range Management and Domestic Livestock Grazing within MA 4B34

<i>Measure</i>	<i>Alt. B</i>	<i>Alt. C**</i>	<i>Alt. D</i>	<i>Alt. E</i>	<i>Alt. F</i>
<i>Maximum percent utilization of woody vegetation (percent of mean annual vegetative production)</i>	40%	25%	40%	25% within bull trout spawning and rearing reaches 40% for all other watercourses including anadromous fish reaches	25% in bull trout spawning and rearing habitat (all three national forests) 35% in anadromous fish reaches (UMA and WAW) 40% outside bull trout spawning and rearing habitat (MAL) 40% outside anadromous fish reaches (UMA and WAW)
<i>Maximum percent utilization of herbaceous vegetation (percent of mean annual vegetative production)</i>	40%	10%	40%	25% within bull trout spawning and rearing reaches 40% for all other watercourses including anadromous fish reaches	25% in bull trout spawning and rearing habitat (all three national forests) 35% in anadromous fish reaches (UMA and WAW) 40% outside bull trout spawning and rearing habitat (MAL) 40% outside anadromous fish reaches (UMA and WAW)

**Comment:** There is no basis for any of these utilization numbers; it will end grazing on the three national forests. They are so onerous to monitor and so low that it will not be economical to even turn out on these sites.

**Comment:** As stated before, these guidelines are based on erroneous information. The Holecheck paper this is based on, is not peer reviewed and is not for the forested types of country. Not appropriate for a multiple use forest. Utilization standards should follow the WC plan. These are way too restrictive. They will devastate the grazing industry in Eastern Oregon, they are not based on science.

**Comment:** In other areas of the plan it has been stated that riparian areas and rangeland are on an upward trend. If this is the case why are the utilization standards being decreased?

Page 129 – Volume 1

**Analysis Assumptions**

*Excessive impacts for an extended period can cause the system to cross thresholds that permanently alter it beyond its ability to recover (Laycock 1994, Miller et al. 1994). It is assumed in this document that, in general utilization of 40 percent or less of the forage on the landscape would result in proper management (see discussion of utilization below).*

**Comment:** Where is this documented? We have been using 45% during all this recovery you just talked about and now you fall to 40%.

Page 131 – Volume 1 (Paragraph 1)

*All of the action alternatives vary in the percent utilization of woody and herbaceous vegetation within riparian management areas, but they have the same minimum residual stubble height (at the green line) of 4-6 inches and the maximum bank alteration of 20 percent.*

**Comment:** There is still no scientific basis for the 20% bank alteration and should not be put in the forest plan. This should just say that "stubble height for green line and bank alteration will be used to monitor these conditions".

Page 132– Volume 1

**Table 80. Management direction for maximum percent utilization of livestock grazing in riparian areas**

Management Level	Grass and Grass-like		Shrubs	
	Satisfactory	Unsatisfactory	Satisfactory	Unsatisfactory
Stewardship B	40%	0-30%	30%	0-25%
Extensive C	45%	0-35%	40%	0-30%
Stewardship B	40%	0-30%	30%	0-25%
Extensive C	45%	0-35%	40%	0-30%
Intensive D	50%	0-40%	50%	0-35%
Stewardship B	40%	0-30%	30%	0-25%
Extensive C	45%	0-35%	40%	0-30%
Intensive D	50%	0-40%	50%	0-35%
Stewardship B	40%	0-30%	30%	0-25%
Extensive C	45%	0-35%	40%	0-30%
Intensive D	50%	0-40%	50%	0-35%

**Comment:** What is meant when a maximum is a range?

Page 133 – Volume 1 (Paragraph 5)

*The desired upland utilization for both E and F for herbaceous vegetation is 35 percent or less in areas of season long use and of low departure from desired condition.*

**Comment:** These are desired, is this a standard, guide or what? It is totally unacceptable and must not be left in place or it will curtail grazing across the three forests. It is based on an ocular evaluation and bias will creep into this and cause problems. In an attempt to produce a stable forage base this pulls the rug out from under it. Also We do not believe that 35% or 40% is based on any scientific information.

Page 146 – Volume 1 (Paragraph 5)

*The lessons from these and other studies are that utilization levels that maintain long term health, recovery, and resilience to disturbance are highly variable and depend on site specific conditions; and the that stocking rates and grazing systems are important for improving rangeland conditions. The Blue Mountain Forests use forage utilization as a trigger for livestock management pasture moves for maintenance or improvement of resource conditions.*

**Comment:** Much of these three forests are not arid or even semi-arid lands, USFS need to use the research from our area.

Page 149 – Volume 1

**Alternative E and F**

*This would be a modest change with a limited effect since utilization in the uplands does not exceed 35 to 40 percent in most active allotments.*

Page 297 – Volume 1 (End of Paragraph 1)

*Average forage use intensity would be near 1 percent for alternative C and the greatest calculated forage use intensity in any single sub-watersheds would be near 2 percent*

**Comment:** There seems to be confusion between “average utilization” across the landscape and “utilization standards”. This is being displayed as if the 40% utilization will be implemented as an average use of sub-basins. This is not true. Utilization is done site by site. Average utilization may well be below, however, when it becomes a standard all the sites must come in below or the producer is out of compliance.

Page 317- Volume 2 (Paragraph 2)

*As such, it is anticipated that those alternatives with utilization levels of 40 percent or less (table 312) will continue to provide quality forage for elk and deer.*

**Comment:** Again, neither does 45 and 50%. Just being "safer" doesn't make it the appropriate thing to do.

**Comment:** Timber management would allow for more forage.

Page 318 - Volume 2 (Paragraph 6)

*Alternative C would have the least impact on suitable habitat for elk and deer because the least amount of suitable foraging habitat coincides with proposed domestic livestock grazing areas.*

**Comment:** Again this alternative analysis missed the reduction in vegetation because of continued overstocking of the forests and the devastating effects of the catastrophic fires that will continue at a higher rate under Alternatives C yet continues to blame the livestock grazing for making lands not suitable habitat for the elk and deer.

Page 331 - Volume 2 (End of Paragraph 5)

*The pressure for development of this land into smaller and smaller parcels will continue to reduce the quality and availability of big game winter habitat.*

**Comment:** This is real and should be included in the "risk" of not recognizing the economics of ranching and the need to keep these ranches viable.

Page 373 - Volume 2 (Last Paragraph)

*Residual stubble height and bank alteration standards remain the same between all alternatives.*

**Comment:** 25% utilization is not a reasonable guideline. It will cut usable AUM's on the forest significantly. It will also be very difficult to manage.

*However, for alternative C there would be a beneficial affect achieved through a combination of a reduction in AUMs by 75 to 80 percent and a reduction in the acres designated suitable for grazing by about 65 percent.*

**Comment:** This is not true and these types of statements are the reason that courts are full of suits to stop the USFS from managing their lands. AUM numbers do count. This statement also insinuates that you will reach these thresholds before reaching AUM limits, which means you, intend to reduce the grazing on the USFS lands.

<p>PL- 4 T New</p>	<p><b>Guideline</b> Maximum forage utilization of key species should not exceed 30 percent in occupied habitat of threatened,  endangered, and sensitive plant  species, except where an approved  conservation strategy, conservation  agreement, or recovery plan approves an alternate use level.</p>	<p><i>This alternative has no corresponding standard or guideline.</i></p>	<p>This alternative has no corresponding standard or guideline.</p>	<p>These alternatives retain the alternative B modified management direction.</p>
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**Comment:** If this is left in then grazing should be allowed during the time that strategies or agreements are developed. This is needed so that one side of an issue cannot stall to keep grazing from occurring by just not agreeing to any reasonable strategy.

*In order to provide context, especially for the economic and well-being section of this document, the total animal unit months (AUMs) available for each alternative must be estimated. For a variety of reasons, AUMs can vary on an annual basis, as well as by forest. For this reason, the*

*number of cattle permitted between 2007 and 2009 was averaged for each forest and then divided by the number of suitable acres within active cattle allotments in 2010 to obtain an average AUM per suitable acre. This was then used to estimate the number of cattle AUMs for each alternative, including alternative A to allow unbiased comparison between alternatives.*

**Comment:** This is an inappropriate method. The numbers don't add up and are so inconsistent that we cannot evaluate this plan.

## **Range - Weeds**

*Page 123 –Draft Plan*

*NOX-2 G-29 Changed to standard*

### **Standard**

*Materials used for construction or restoration projects on National Forest System lands shall be free of invasive specie*

**Comment:** Should require Oregon Certified Seeds. They are the gold standard and the only way of assurance of no noxious weeds.

*Page 143 – Volume 1 (Paragraph 6)*

*While much of the impact from introduced plants has come from noxious weeds that are commonly treated to the extent possible, there are infestations that have limited management options and therefore are not commonly treated. Annual invasive grasses, including cheatgrass (*Bromus tectorum*), are aggressive or harmful nonindigenous plant species. Cheatgrass has invaded the planning area and can be found in many grassland and shrubland habitats. It normally has minimal influence except where significant disturbances, such as fire and excessive or improper grazing or vegetation management practices, have allowed the species to spread and become common (Quigley et al. 1997).*

**Comment:** How narrow focused. Both Ventenata and Medusa head are much more significant invaders than cheat and are not even mentioned. Plan needs to add information on Ventenata and Medusa head.

## **Recreation**

*Page 401 – Draft Environmental Impact Statement – Volume 2, Chapter 3*

*All alternatives emphasize a mix of recreation opportunities providing today's recreationists with reasonable assurances of future motorized and nonmotorized recreational opportunities. Alternative D may provide more recreation opportunities toward the developed end of the recreation opportunity spectrum classes by accelerating development of the Blue Mountain national forests with a variety of management actions. Some values such as remoteness, solitude, and wildlife-related recreation opportunities may be reduced in alternative D.*

**Comment:** The population is ageing and the need for developed recreation and motorized recreation will naturally increase.

Page 50- Draft Plan - Paragraph 4

### 2.1 Scenery

**Background:** Scenic attributes, including identifiable patterns, distinct color, texture, and form, and elements, such as aspen stands and rock formations, are derived from specific geological features and functioning ecosystems. These features provide a scenic identity and image that is valued as a backdrop for the activities and experiences that create memories and meet expectations of national forest visitors (Bacon et al. 1974 and Ryan 2005). People value the scenery of the Blue Mountains national forests for the natural beauty, undeveloped or undisturbed scenes, and rural western setting while visiting or recreating. There are many opportunities to view historic structures and traditional uses, such as historic mining operations, ranching facilities, Civilian Conservation Corp structures, pole fences, and historic ditches. Mountainous environments and canyons that create scenes of dynamic vertical change combine with the plant communities that are present at differing elevations and with geological features, such as rock outcrops and peaks. Water features create strong visual images that are highly valued. All of these attributes and many more create patterns and mosaics that contribute to the scenery of the Blue Mountains.

**Comment:** But no one wants to see the beauty that is created by good logging practices, such as open pine forest settings. Most people's vision is of the open forest type; to get back to that we need to manage and should include these visions.

Page 417 – Draft Environmental Impact Statement – Volume 2, Chapter 3

*No significant issues related to scenic resources were identified during scoping or the need for change analysis process.*

Page 424 – Draft Environmental Impact Statement – Volume 2, Chapter 3

### *Effects from Vegetation Management on Scenery Resources for Alternative D*

*The level of vegetation management anticipated for alternative D may result in an improved scenic stability condition in the long term due to the emphasis on reducing fuels and treating vegetation to move it toward the historic range of variability. However, this alternative may create a more managed and less natural appearing landscape. Vegetation management would emphasize active management in the dry forest type, creating more open stands of trees with a park-like appearance. There would be more evidence of logging, including stumps visible from tree removal, skid trails, and debris piles.*

*Long-term effects may include landscapes that appear more as they might have at the turn of the century, reduced brush density, and vistas available because of reduction of vegetation density.*

**Comment:** The more aggressive alternative, based on Wallowa County Comprehensive Management Plan, would have long term scenic benefits by restoring the landscape to the turn of the century appearance.

Page 386 - Volume 2 (End of Table)

**Table 364. Recreation visitation by county for each national forest**

**Comment:** Wallowa County isn't even in the WWNF? You display ADA county Idaho. This often is par for the course.

## Restoration

*Page 98– Draft Plan -Paragraph 4*

### *Restoring and Maintaining Terrestrial Vegetation Conditions*

*The management approach includes creating more resilient and sustainable terrestrial ecosystems that maintain future management options by:*

- *Concentrating active restoration in areas with established road systems and previous treatments (plantations, past thinning areas, etc.)*

**Comment:** Really? You have a whole forest out there that is coming down around your ears ecologically and you want to concentrate active restoration only where previous treatments have occurred. This philosophy is wrong. You should manage the whole watershed, not just those areas that agreed upon by all parties such as the environmental community.

*Page 99– Draft Plan -Paragraph 2*

*To create a landscape that is more resilient and better able to respond to climate change, management activities will be designed to maintain specific conditions, such as:*

**Comment:** Wait, but only in areas previously entered, let the rest rot and burn! These statements are inconsistent with the previous statement that we will only work where there are roads, or use prescribed fire that will not be accomplished because the limited days you can burn safely.

*Page 99– Draft Plan -Paragraph 2*

- *Planting of tree species (includes genetic considerations) that are likely to be better adapted to the expected climate and changed species distribution*

*Page 99– Draft Plan -Paragraph 2*

- *Conditions that are less susceptible to invasive species*

**Comment:** It is OK to plant different tree species that are better adapted to climate change but where we have options to plant nonnative grasses that will work to slow and stop invasions of particularly annual grasses, we say no. You will only use native seeds that are at best very slow to establish, if they work at all (most are not effective), and we leave open ground to the invasive, all for purity of native only failed policy. This policy needs changed to allow and even encourage the best option of limiting the invasion of noxious weeds.

*Page 99 –Draft Plan -Paragraph 4*

### *Restoring and Maintaining Watershed Conditions*

*The overall strategy is to accelerate improvement of watershed and aquatic/riparian conditions across the landscape by: 1) conducting new and ongoing management activities in a manner that, across broad scales, protects areas in good condition and allows for passive recovery of those that are degraded; 2) actively restoring conditions at watershed scales in high-priority areas by implementing integrated, strategically-focused sets of restoration treatments that facilitate recovery of critical watershed processes.*

**Comment:** We agree with this, but it is inconsistent with previous statement that you will concentrate active restoration only where there are roads and previous activity. That is not a watershed approach.

*Page 99–Draft Plan -Paragraph 5*

*This strategy is an updated and enhanced version of the Forest Service’s existing aquatic strategy known as PACFISH (USDA and USDI 1995) and INFISH (USDA Forest Service 1995a). It consists of five essential elements: riparian management areas, key watersheds, mid-scale analysis of watersheds, watershed restoration, and monitoring. These elements work together to achieve a distribution of watershed conditions that are resilient to natural disturbance and that maintain, restore, and enhance habitat for resident and anadromous fish and other aquatic and riparian dependent organisms:*

**Comment:** These documents were never intended to be permanent. They were to last approximately 6 months. They are created by folks in a room. They took no data and used a very wide brush that has plagued us ever since. One thing they did was that if site specific information is available you could utilize that to justify not following the PACFISH/INFISH rules. At least that effort needs continued.

*Page 100–Draft Plan -Paragraph 6*

*Watershed conditions in the Blue Mountains have been altered by a series of human uses during the last 150 years, including mining, logging, agriculture, water diversions, flood control, wildfire suppression, grazing, road construction and maintenance, and hydro-electric development. The ability of watersheds to function has been affected by the alteration of vegetation conditions, increased erosion, and changes in the rates and magnitude of watershed runoff (McIntosh et al. 1994).*

**Comment:** Need to add Recreation to list of reasons for alterations.

*Page 101 – Draft Plan - Paragraph 1*

In the Blue Mountains, as elsewhere in the Pacific Northwest, remaining high-quality aquatic habitats are largely located on Federal lands but are often fragmented or disconnected from other high-quality habitats

**Comment:** This is not true and needs to be discontinued as an assumption with the regulatory agencies. Wallowa County’s watershed assessments have shown that private land, in general, is in as good or better ecological condition than public land. This premise should be removed from the document. Much of the USFS Lands are degraded and if it weren't for the private lands many species would be in trouble.

*Page 102– Draft Plan - Paragraph 5*

*Restoring and Maintaining Social and Economic Conditions*

*The management approach is designed to restore and maintain scenery, cultural resources, treaty resources, recreation resources, and the wildland urban interface, as well as contribute to economic opportunities for local communities by:*

**Comment:** These are nice statements; however, they seem to be second class statements. These need to have equal footing on the decision making process and the ecological issues.

Page 103– Draft Plan - Paragraph 2

*Integration of the Management Focus*

*The identification of focal points highlights those areas where immediate improvements to the resiliency of the system could be made or that are most sensitive from a social perspective. Considering the factors discussed previously, the drivers for active restoration priorities are:*

- *Priority watersheds*
- *Wildland-urban interface*
- *Dry upland forest potential vegetation groups*

**Comment:** The environmental communities threat to sue if the USFS manages in the cooler and moister sections of the forest has made us spend most of our time in the past 20 years here. We really need to get on with watershed management on all lands, not just those that are acceptable to one section of society.

Page 105- Draft Plan - Paragraph 1

Table 26. Objectives and associated desired conditions for each national forest

<i>Objective Statements</i>	<i>Malheur</i>	<i>Umatilla</i>	<i>Wallowa-Whitman</i>
	<i>12 sites</i>	<i>10 sites</i>	<i>12 sites</i>
• <i>Increasing the number and extent of beaver-created wetlands (sites)</i>			

**Comment:** Most beaver plants failed. Beaver cause both a negative and positive response to the watershed. The biggest problem is they like to eat our riparian vegetation. When they get that done they move on. That means that the sites created are not permanent. Also beavers like to build in the easiest places. Many times this is at the end of culverts or flooding roads or fields and then the beaver has to be moved. This is not a good viable option.

Page 106- Draft Plan - Paragraph 1

*1.4.1 Wildland Fire (Planned and Unplanned Ignitions)*

Table 26. Objectives and associated desired conditions for each national forest

<i>Objective Statements</i>	<i>Malheur</i>	<i>Umatilla</i>	<i>Wallowa-Whitman</i>
<i>Treat stands using silvicultural treatments and/or prescribed burning</i>	<i>220,000 acres</i>	<i>220,000 acres</i>	<i>220,000 acres</i>

*(planned ignitions) to move towards Fire Regime Condition Class 1 and 2 in the dry and moist upland forest PVGs or to protect values at risk from wildland fire.*

**Comment:** You have been trying to use prescribed fire for decades. It turns out to be of very limited use because of days able to burn due to weather, locations that are too high risk of fire getting away and the current fuel loads are so high it usually needs to follow mechanical entries. You should not get credit for double entry acres. If you log it or burn it in year one you don't count it again if you burn it in year five.

*Page 106- Draft Plan*

*Table 26. Objectives and associated desired conditions for each national forest*

<i>Objective Statements</i>	<i>Malheur</i>	<i>Umatilla</i>	<i>Wallowa-Whitman</i>
<i>1.5 Invasive Species</i>			
<i>Reduce current infestations of invasive plant species.</i>	<i>1,500 acres</i>	<i>7,000 acres</i>	<i>7,000 acres</i>

**Comment:** Seeding aggressive plants that will keep invasives out is a tool that should be used in conjunction with other options.

*Page 128–Draft Plan*

### ***Watershed Restoration***

*(guidelines apply to all three national forests)*

*WR-1 G-57*

#### ***Guideline***

*Watershed restoration projects should be designed to maximize the use of natural ecological processes as a tool in meeting and maintaining restoration objectives.*

**Comment:** maximize the use of natural ecological processes? Why are we dictating which tool to use when we don't know the question or the need.

*Page 33– Volume 1*

#### ***Issue 6: Ecological Resilience***

*Alternative C is designed to emphasize the role of natural processes in the restoration of ecological resilience. Forested vegetation mechanical restoration treatments and forage use intensity both would be less than all the other alternatives. With the exception of alternative D, roads treatments would be greater than the other alternatives. The greatest amount of sub-watersheds would be improved, but the dry forest fire regime condition class departure score would improve the least.*

**Comment:** You talk about current conditions and how at risk we are to catastrophic fire but here you reduce treatment and say that "the greatest amount of sub-watersheds would be improved". This is inconsistent. These statements need to be changed to be consistent with the level of activity you are proposing.

*Page 130 – Volume 1 (Paragraph 2)*

*The desired conditions are defined by layers of management direction. A desired condition is identified where HRV objectives with the Public LURs definitions of satisfactory condition (i.e., fair range forage condition with an upward trend or better) are met by attaining a mid-seral ecological status with an upward trend or higher condition based on the PNC, and recognizes that some communities have been altered, changing the PNC. Where ecological sites in state A are managed to maintain their current state, and ecological sites in states B and C are managed to transition toward state A (Stringham et al. 2003, Swanson and Johnson 2008, and Bestelmeyer et al. 2009). In situations where ecological sites have crossed a threshold (state D), restoration through livestock management is not possible. These lands are considered to be in unsatisfactory condition, and may have continued livestock use along as the rate of recovery of these sites is within 70 percent of the natural rate of recovery (HCNRA CMP FEIS 2003 pp C-38). Because of the time and expense to restore the condition of sites that have crossed a threshold, there are not any plans to do active restoration in the near future.*

**Comment:** This should not be included this way. It accepts defeat. Leave it with "until cost effective alternatives are found there are not any plans....."

*Page 136 – Volume 1 (Paragraph 4)*

*With specific areas of concern remaining, many riparian areas and wetlands have improved relative to reference conditions (and relative to the early 1900s). It is believed that recovery is continuing at a relatively slow but steady rate. In some instances, this recovery may be accomplished through improved management of the impacting activities while in other cases exclusion of specific uses or activities or active restoration activities may be needed. Efforts have been ongoing to reduce the amount of time livestock have access to streams and the potential for trampling causing stream-bank alteration or stepping on redds. In some cases, the most effective method of protection which set stream habitat improvement on an accelerated trajectory was construction of livestock exclusion fences in critical areas on all three Forests.*

**Comment:** And the most costly. There are also ecological costs to putting in riparian fences that need to be assessed before fencing.

*Page 214 – Volume 1 (End of Page)*

*Figure 14. Comparison of the approximate number of years required to complete forested vegetation active restoration activities within management area 4A and 4C under each alternative within each national forest*

**Comment:** What is the rotational interval needed to keep these lands in reasonable condition? If the rotation does not allow all the lands on the forest to be covered during a rotation then the plan is unsustainable.

*Page 255– Volume 1*

*Setting*

*The climate of the Blue Mountains is largely continental with cold winters and hot, dry summers. Annual precipitation for the period from 1971 to 2000 ranged from less than 10 inches in low elevation valleys to more than 100 inches.....*

**Comment:** This is too high. Maximum is closer to 65 inches.

*Page 280 – Volume 1 (Alternative C at The End of the Paragraph)*

*During the long term there would be an increased risk of disturbance associated with limited active vegetation treatment particularly in dry forest types, potentially reducing benefits to watershed condition*

**Comment:** Evidence on your own WWNF in the canyons refutes these statements and assumptions. The reality is that you reduce logging to little or no activity; you eliminate grazing in riparian areas which would stop much of the grazing in the three forests. This would increase fire risk, intensity and timing to the point that watershed would be devastated.

*Page 305 – Volume 1*

**Table 188. Forested vegetation condition classes and number of sub-watersheds in each class at year 20 for each alternative for the Wallowa-Whitman National Forest**

<b>Forested Vegetation Condition Class</b>	<b>Existing Condition</b>	<b>Alt. A Yr. 20</b>	<b>Alt. B Yr. 20</b>	<b>Alt. C Yr. 20</b>	<b>Alt. D Yr. 20</b>	<b>Alt. E Yr. 20</b>	<b>Alt. F Yr. 20</b>
1	108	116	116	114	121	121	116
2	40	48	48	47	49	43	48
3	75	59	59	62	53	59	59

*Page 305 – Volume 1 (Paragraph 1)*

*At year 10, more watersheds would have vegetation in the least departed condition (condition class 1), but there would be little difference in condition between alternatives.*

**Comment:** Alt D would be much more aggressive, but the results would be the same? Either the assumptions you use to detect change or the level of treatment must be so low you don't really change the condition class. Either way this analysis needs redone.

*Page 52 - Volume 2 (Paragraph 2)*

*Research has shown that effective vegetated filter strips need to be at least 200 to 300 feet wide to effectively capture sediment mobilized by overland flow from outside the riparian management area.*

**Comment:** This is site specific; you cannot make this general statement. What species soils and slopes are involved will dictate the value of these filter strips. It is inappropriate to make a blanket statement such as this without explaining the variables.

*Page 85 - Volume 2 (End of Paragraph 2)*

However, historical photography (Skovlin and Thomas 1992) and early accounts (Bright 1994) indicate that aspen forests were never as widespread in the Blue Mountains as in other parts of the West

**Comment:** You blame everything else on climate change. Why not this? The aspen is on the edge of its range. It could well be the first species affected if in fact there is a warming trend.

*Page 232 - Volume 2*

*Table 314. Relative ranking of alternatives (1-6 with 1 being the best) for habitat improvement and risk reduction for focal species identified with high or moderate-to-high level of concern for viability for each national forest*

**Comment:** Using a ranking instead of relative differences does not tell this story. It should be relative differences, especially after it is stated that all species would be viable under all alternatives. We need to see "how much difference" vs. ranking.

*Page 234 - Volume 2 (Paragraph 3)*

*There is a large degree of uncertainty however, especially for the three open habitat species, and therefore all action alternatives should require monitoring of both habitat and risk factors over time.*

**Comment:** Note: to get open habitat we need to enter these stands and open them up!

*Page 304 - Volume 2 (Paragraph 3)*

*Effects to Rocky Mountain Elk in the Wallowa-Whitman National Forest – At the end of the second decade, all alternatives except D and E maintain more than 30 percent of the landscape in security cover within the Wallowa-Whitman National Forest (see figure 53). Security cover begins to dip below the 30 percent level by the fourth decade.*

**Comment:** How can this be possible when less than 20% of the USFS lands can even be entered and each decade the hiding cover and escapement will be restored in the lands entered? This needs changed to really reflect the dynamics of the activity, the regrowth and the wildlife corridors.

*Page 184 - Volume 3, Appendix A*

#### ***1.1.4 Groundwater Dependent Ecosystem Function***

***Desired Condition:*** *Springs, peat-lands and groundwater fed wetlands in the Blue Mountains are maintaining or regaining their ecological structure and function. .... Livestock herbivory and trampling are not adversely affecting sites*

**Comment:** Should add function "not adversely affecting site function".

*Page 191 - Volume 3, Appendix A*

#### ***1.7 Plant Species Composition***

*The mix of species in the grass and shrub layer of forests as well as shrub and herb-land vegetation contain a diverse array of native species, distributed across the landscape reflecting*

*historical conditions. Perennial native bunchgrasses dominate many grass and shrub-lands. Native grasses, grass-like plants (sedges and rushes), forbs and various shrubs characterize the forest understory. Riparian zones consist of meadows with obligate wetland species including native grasses, sedges and rushes, riparian hardwoods, and structurally diverse shrub-lands.*

**Comment:** The rules of no non-native seeding of grasses are social engineering, not biological or ecologically appropriate. There are many sites that if you only use native seed it fails and you get open sites where weeds invade. Non-native seeds would have dominated the sites, kept invasive annuals out and offered great sources of forage for both wildlife and livestock. Biologically, economically and socially it makes no sense not to use nonnative species.

*Page 310 - Volume 3, Appendix A*

**Table A-57. Monitoring plan framework for the action alternatives for each national forest**  
*Proposed Monitoring Question? What is the status and trend of water quality? --- Miles of state-listed impaired waters*

*Proposed Monitoring Question? What is the status and trend of stream temperature?— Stream temperature*

**Comment:** Never had a river removed from the 303d list of streams. That makes this an inappropriate parameter and should be removed.

**Comment:** No way trend can be established in this plan's timeframe.

*Page 316 - Volume 3, Appendix A*

*8. The effects of each management system to determine that they do not substantially and permanently impact the productivity of the lands (16 U.S.C. 1604(g)(3)C). Focus on key ecosystem characteristics in the plan area related to soils and soil productivity identified in the assessment and planning process.*

*Are outputs of goods and services being produced consistent with the levels expected in the forest plan? --- Acres of fuels reduction treatments, CCF timber harvest, AUMs*

**Comment:** Typical monitoring program for USFS: 36 questions about environmental issues and one on economics. This just shows how much Service really cares about the surrounding people and communities. Bias is showing again.

## **Roads**

*Page 17 – Draft Land Management Plan*

*An additional challenge is managing public use and land management access to the road system at a level that will not render the surrounding habitat unusable to wildlife due to human disturbance and the loss of snags as a result of firewood collection and hazard tree removal.*

*Page 61 –Draft Plan-Paragraph 3*

*2.7 Roads and Trails Access*

*During the last 25 years, Forest Service project analyses have determined that many roads could be closed and decommissioned to improve resource conditions. Some benefits of these closures*

*include reducing disturbances to wildlife, improving water quality and reducing road maintenance costs. In the 1990s, advancements in OHV technology began to result in changes in use. Riders found that they could use OHVs to access rugged areas which had previously been accessible only by foot or horseback. This new type of use resulted in resource impacts, conflicts between user groups, and safety concerns.*

**Comment:** Why are you only pointing out the impacts and not the benefits of these roads? It should be pointed out that roads allow for access for many who can no longer walk great distances, it allows for access for hunting and gathering of berries, mushrooms, fire wood, timber harvest, sight-seeing etc. These benefits of roads need to be weighed against the impacts in deciding any road closures. Also, wildlife uses the roads. Many times it is an easier route than going through a dense forest.

*Page 61 –Draft Plan- Paragraph 6*

*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. Given the priority of maintaining passenger vehicle access roads, much of the deferred maintenance will fall on maintenance level 1 and 2 roads, which represent 93 percent of the road network. Many of these roads are decades old with aging infrastructure that may require complete reconstruction in order to meet standards, especially considering that they have had inadequate maintenance due to the increasing maintenance intervals and growing backlog issues.*

**Comment:** A forest plan should not be about budget. Emphasis in the EIS and the plan should look at existing conditions of the roads. To do this you must first inventory the roads, or accept the inventory made by the local communities, and then set priorities on what needs maintenance the most. A budget is generated from what actions need to be done not the other way around.

*Page 62 –Draft Plan- Paragraph 4*

**Desired Condition:** *Road systems are safe and responsive to public needs and desires, are affordable and efficiently managed, have minimal effect on aquatic and terrestrial systems, and are in balance with available funding. Road density is at a level appropriate to avoid causing resource concerns. Administrative use supports Forest Service management objectives. Conflicts between user groups are minimized, and users take on appropriate challenges and risks.*

**Comment:** The roads should be in balance with the needs of the users of the forest offering good access to the areas for the public's good and for administrative use. Remove the budget issue; that comes later. For desired conditions you should come up with a more obtainable desired condition not something that can be found in dream land.

*Page 63 – Draft Plan - Paragraph 1*

*The desired condition is to reduce road-related sedimentation by reducing road density and reducing hydrologic connectivity of the road system. The desired condition for open motor vehicle route density within watersheds in MA 3C is 1 mile per square mile or less. In addition, all cross-country over-the-snow vehicle travel is prohibited within MA3C, and over-the-snow vehicle travel permitted only on routes designated open to summer motor vehicle travel.*

**Comment:** Wildlife corridors should not have separate road density standards. These areas are all over the landscape causing almost all of the watersheds to have the one mile per square mile because you almost never will be able to find areas where the roads do not cross these corridors. Also, the forest plan

was to set up guidelines. These are standards. They should not exist; however, if they do they should at the very least be guidelines.

*Page 97– Draft Plan -Paragraph 1*

Table 25:. General suitability matrix for management areas

Trail Construction - 4B

**Comment:** Need to change box to “S” riparian management areas should not have separate road density standards. These areas are all over the landscape causing almost all of the watersheds to have the one mile per square mile because you almost never will be able to find areas where they roads do not cross these corridors. Also, the forest plan was to set up guidelines. These are standards. They should not exist; however, if they do they should at least be guidelines.

*Page 107- Draft Plan*

Table 26. Objectives and associated desired conditions for each national forest

<i>Objective Statements</i>	<i>Malheur</i>	<i>Umatilla</i>	<i>Wallowa-Whitman</i>
<b>2.7 Roads and Trails Access</b>			
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

**Comment:** YOU FORGOT THE PEOPLE. IT MUST STATE; " NEEDED FOR SAFE AND EFFICIENT TRAVEL SYSTEM THAT MEETS THE NEEDS OF THE PEOPLE, COMMUNITIES AND ADMINISTRATION OF THE FOREST AND FOR.....

**Comment:** These objectives and desired conditions will close access to the citizens of Wallowa County and, we are sure, across the three forests. Wallowa County alone had nearly 500 miles of ML 2 roads in our desired condition under TMP and the local Forest Management.

Page 118 – Draft Plan

*WLD-HAB-13 G-16 Guideline*

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

**Comment:** This is Draconian over kill. The elk are becoming a weed in Wallowa County. They are approaching twice their management objectives in several of our units. There is no reason that they should be considered a focus species. This should be tied to only if they are less than 50% of Management Objectives. Additionally the new research report “Habitat-nutrition Relations of Elk during Spring through Autumn in the Blue Mountains of Eastern Oregon” by Rachel C. Cook, John G. Cook, Robert Riggs, Larry L. Irwin 2014 identifies summer nutrition as the most critical habitat need, not road issues.

Page 107 – Draft Land Management Plan

*Objective Statements*

*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).*

Page 129 – Draft Management Plan

**Individual Old Trees**

*(guidelines apply to all three national forests)*

OF-2

**Guideline**

New

*New motor vehicle routes should not be constructed within old forest stands.*

Page 37 – Draft Environmental Impact Statement – Volume 1, Chapter 2

*Under Alternative E – Preferred alternative*

*This alternative takes a different approach by moving away from road densities in general forest (MA 4A) and instead focusing on the roads that are causing the biggest problems on the landscape to fish and aquatic ecosystems. In this alternative, the desired condition would focus on hydrologically disconnecting the roadbed from the stream system. This would involve replacing undersized culverts, out-sloping roads, hardening surfaces to reduce erosion, occasionally relocating or decommissioning roads to address the roads with a focus on watersheds with threatened and/or endangered aquatic fish species.*

Page 80 – Draft Environmental Impact Statement – Volume 1, Chapter 3

**Cumulative Effects – Access**

*Implementation of all alternatives, except for alternative A for the Umatilla National Forest,*

would affect access over time. In every other alternative, open motor vehicle route density would exceed desired conditions, which makes it likely that site-specific project level decisions would result in road closure or decommissioning as the Forest Service attempts to achieve or move toward the desired conditions.

All alternatives, except alternative A for the Umatilla National Forest, propose management direction that would result in the closure or decommissioning of open motor vehicle routes in order to meet desired conditions. Minimal new road construction would occur for all alternatives.

Page 300 – Draft Environmental Impact Statement – Volume 2, Chapter 3

Intrusion from sources other than hunting is increasingly a problem for elk managers (ODFW 2003a). This is particularly true on multiple-use public lands where access by motor vehicle and non-motorized traffic is largely unrestricted and increasing (ibid). Traditional elk habitat models recognized the impacts from access, and used road density in order to evaluate impacts of proposed land management actions. This approach was better suited to the 1980s when most proposed projects were timber sales and associated roads needed for implementation. Since the early 1990s, both road building and timber sales have decreased while recreational, non-motorized and motor vehicle cross-country activities and facilities have dramatically increased. While road density is still important, the impact from recreational access that doesn't use designated roads or trails is emerging as a pressing issue. Many federally administered public lands are open to cross-county travel by any means unless specifically closed (i.e., wilderness, seasonal area closures, etc.).

**Comments:** All five of the above excerpts insinuate that more roads will be closed and/or decommissioned in future projects. Without doing a transportation analysis by watershed to determine the transportation system that is needed for multiple use management of the watershed, the closing of roads (just to close roads) is very likely. This closing of roads (just to close roads) is not acceptable. Again, do transportation analysis by watershed to determine the road needs.

**Comment:** There are also more elk than there was in the past so their habitat is expanding close to roads.

**Comment:** Seasonal road closures and the elimination of cross country travel to calving areas, winter range, and hunting areas will provide the security needed.

Page 119 – Draft Plan

WLD-HAB-26 G-14 Guideline

Roads and trails should not be constructed within high elevation riparian areas.

Page 128–Draft Plan

### **Key Watersheds**

(standards apply to all three national forests)

KW-1 S-15

#### **Standard**

There shall be no net increase in the mileage of Forest Roads in any key watershed unless the increase results in a reduction in road-related risk to watershed condition. Priority should be given to roads that pose the

*greatest relative ecological risks to riparian and aquatic ecosystems.*

*Page 133 – Draft Plan*

*MA 2A WSR-6 G-76*

**Guideline**

*Timber harvest roads should not be constructed within wild and scenic river corridors.*

*Page 63– Volume 1 (Paragraph 3)*

*While the forest plan would not change designations of roads and trails for motor vehicle use, it would provide direction for future planning. Specifically, the forest plan would include determinations (generally suitable or unsuitable for motor vehicle use) that dictate whether or not motor vehicle routes can be constructed or reconstructed in an area. The areas that would be generally unsuitable for motor vehicle use would be dominated by non-motorized uses.*

*Page 34 - Volume 2 (Paragraph 3)*

*Under alternatives B through F, additional protections related to construction of new roads would be provided by additional desired conditions, goals, standards, and guidelines specific to key watersheds.*

*Page 50 - Volume 2 (Paragraph 2)*

*Increased protections related to roads are reflected in standards and guidelines for alternatives B, C, E, and F that prohibit construction of new roads and trails in high elevation riparian areas.*

*Page 198 - Volume 2 (Last Paragraph)*

*No new road construction is anticipated for any of the alternatives. The alternatives provide a range of desired open motor vehicle route densities within the management areas.*

*Page 285 - Volume 2 (Paragraph 3)*

**Open Motor Vehicle Route Density** – *In addition to snag densities, the model uses road density as a variable to account for the probable reduced snag densities along roads. Bate et al. (2007), found that snag numbers were lower adjacent to roads due to safety considerations, firewood cutters, and other management activities.*

**Comments:** All nine of the above excerpts insinuate that more roads will be closed and/or decommissioned in future projects. Without doing a transportation analysis by watershed to determine the transportation system that is needed for multiple use management of the watershed, the closing of

roads without balancing the economic and environmental impacts and benefits is very likely. This is not acceptable. Again, do transportation analysis by watershed to determine the road needs.

Road availability, need, use etc. should be evaluated for each road – putting a so many miles of roads per square miles is management by numbers, not resources.

*Page 10 – Volume 1*

*Key Indicators:*

- *Road maintenance funds projected to be available to maintain the transportation system*
  - ◆ *Projected road maintenance for each road maintenance level (miles)*

*Page 63– Volume 1*

*Issue 1: Access*

*Access to the national forests, including access for recreation, administrative use, permitted activities, valid existing rights, and firefighting, was identified as a significant issue during scoping. The issue involves road and trail access for motor vehicles, road access for managing resources, the cost of maintaining the transportation system, and the desire to reduce motor vehicle route density (and therefore access) to improve fish and wildlife habitat and to protect streams. Access is best analyzed and discussed as whether an area is generally suitable or unsuitable for motor vehicle and non-motorized uses.*

*Page 67– Volume 1*

*Key Indicators for Analyzing Access*

- *Road maintenance funds projected to be available to maintain the transportation system*
  - ◆ *Projected road maintenance for each road maintenance level (miles)*

*Page 68 – Volume 1*

*figures are calculated using past maintenance and management costs, which fluctuated from year to year. When high clearance and closed roads receive maintenance on such an infrequent interval, deferred maintenance issues can become exacerbated. With the maintenance focus on maintenance levels (MLs) 3 through 5 roads, the deferred maintenance backlog for the remainder of the road system continues to grow. The cost of road maintenance and the budget trend make it likely that future road closures will be necessary.*

*Page 68 – Volume 1*

*The average allocated road maintenance budget from 2008 to 2010 is approximately \$1.3 million for the three national forests. The annual shortfall is approximately 200,000 dollars, which adds to an already substantial deferred maintenance backlog. Given the priority of maintaining passenger vehicle roads, much of the deferred maintenance will fall on maintenance level 1 and 2 roads, which represent 93 percent of the road network.*

**Comment:** Cost of maintenance should not be a factor in a forest plan. You have no idea what congress will do in the next 20 years and there are many ways to maintain roads, and they are evolving every day. Again, budgets are based on proposed actions not the other way around. Partners, volunteers and grant money are just some examples. You have the product (the forest), it is in demand from the public; however, since you won't pay the maintenance of a road you are going to shut out the public. Take the budget issue out of the forest plan.

Page 306 – Volume 1

**Key indicator: Roads**

*The objectives for road related restoration and the percentage of hydrologically connected roads in priority watersheds that this represents are displayed in table 191.*

**Comment:** If they don't even know what roads exist on the forest (other than our analysis) how do they know right down to the mile how many are connected?

Page 141 – Draft Plan

**Roads Management within MA 4B**

*(standards and guidelines apply to all three national forests)*

MA 4B RMA-RD-1 S-49

**Standard**

*Side-casting (placement of unconsolidated earthen waste materials resulting from road construction or maintenance) in riparian management areas shall be avoided.*

Page 300 - Volume 3, Appendix A

*Roads Management within MA 4B35*

MA 4B RMA-RD-1 S-49

*Side-casting (placement of unconsolidated earthen waste materials resulting from road construction or maintenance) in riparian management areas shall be avoided.*

**Comment:** This standard cannot be met in all situations and they are critical roads that must be left onsite. Some sort of exception needs to be in place. The Dry Creek road in Wallowa County is an example.

## **Social & Economics**

Page 15 – Draft Plan - Paragraph 3

**Social and Economic Expectations**

*Public land management inevitably involves conflicting public desires, values, and preferences. The public expects a diversity of uses from National Forest System lands. People frequently disagree about how the national forests should be managed. Interests and opinions are often held*

*strongly, which can lead to a decision-making process characterized by conflict and controversy. This increases the complexity of national forest management.*

**Comment:** This is as weak of a statement as known. Social and Economic Expectations of the National forest lands needs to point out that these lands were set aside to provide goods to surrounding communities for our economic health and these local communities expect and demand that management include their needs.

*Page 15 – Draft Plan - Paragraph 4*

***Diverse Experiences***

*An increasing number of visitors (local, regional, and national) rely on the national forests for recreational opportunities and resource uses in ways that are not always compatible. Technological advances have changed the day-to-day activities of visitors and the way people recreate within the national forests. The increased popularity of motorized recreation has generated user conflicts between those seeking motorized experiences and those seeking solitude in their recreation experiences. New capabilities in other recreational equipment, such as mountain bikes and global positioning systems (GPS), allow people to experience the national forests in new and different ways.*

**Comment:** Additional diverse experiences should include opportunities to see economic activity and have the sense of knowing that our National forests are contributing to our local economy and social wellbeing.

*Page 20 – Draft Plan -Paragraph 6*

*Goals and Desired Conditions*

*Goal 3 – Promote Economic Well-being*

**Comment:** List of goods that promote economic well-being will also promote social well-being.

*Page 39- Draft Plan - Paragraph 3*

***Desired Condition:*** *The distribution and abundance of herb-land and shrub-land structural stages create conditions that are ecologically resilient, sustainable, and compatible with maintaining disturbance processes within the desired conditions. The structural diversity of herb-lands and shrub-lands are characteristic of the settings in which they occur and the disturbance regimes in which they developed. These conditions support the capacity of the plants to reproduce and persist on the landscape. Variations in the mix of structural stage combinations across the landscape allow herb-lands and shrub-lands to respond to potential changes in climate. The desired conditions for structural stages include shrub-land and herb-land potential vegetation groups, as well as grass and shrub layers in forested environments.*

**Comment:** The desired condition should include the production of product. This should not just be an ecological discussion. These forests were established to support the surrounding communities.

*Page 50- Draft Plan - Paragraph 3*

***Goal 2: Promote Social Well-being***

*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. This work allows people to live in communities that are adjacent to the national forests. 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.*

**Comment:** But no timber harvest? Timber harvest should be added to that list.

**Comment:** Should say supporting wildlife, not just fish populations.

*Page 65– Draft Plan - Paragraph 3*

*Resiliency refers to the ability of communities and cultures to adapt to changing ecological, social, and economic conditions. The resiliency of local communities and tribes in the Blue Mountains is important to the national forests because managers benefit from community infrastructure, which includes local knowledge, skilled workers, and social networks/relationships that provide the basis for accomplishing work within the national forests. Communities also provide and maintain roads and facilities that are needed for access to the national forests and services for the public, such as food, beverages, and lodging*

**Comment:** What? Because managers benefit from.....This is not about what managers want, this is about the communities!

*Page 66– Draft Plan - Paragraph 2*

*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.*

**Comment:** The decline of most of our economies was based on the lack of access to timber from the USFS, causing the closure of mills. This was a direct effect of USFS management. These actions were or are not beyond the USFS control. You have chosen to cater to the environmental community and reduce your timber cut to near nothing. It is the USFS that has chosen to support "zero risk management" and promote folks who do nothing, therefore make no mistakes and become the leaders. It is you, the USFS, who have become a custodial form of government when you were supposed to be a management form. Even Washington DC office is looking for ways to do larger projects faster as in the Blue Mountain ID team efforts. This plan should support this larger/faster effort.

*Page 68– Draft Plan - Paragraph 1*

### *3.1 Facilities and Infrastructure*

**Desired Condition:** *Administrative facilities are safe, efficient, cost-effective, and are maintained at a function and use level that meets management needs. Facilities meet all applicable health and safety standards. Impacts to natural resources are minimal. Administrative facilities complement and harmonize with natural settings. The form of structures is derived by the function and from the landscape setting. For example, structures in mountainous, timbered landscapes have steep rooflines and broad eaves and use durable indigenous materials, such as stone and heavy timbers, with the appearance derived from the local environment. Structures,*

signage, and other built environment elements reflect the style and character inherent in the local environment (USDA Forest Service 2001).

**Scale:** Forest wide.

Page 203 - Volume 3, Appendix A (last paragraph)

**3.1 Facilities and Infrastructure**

**Desired Condition:** Administrative facilities are safe, efficient, cost-effective, and are maintained at a function and use level that meets management needs. Facilities meet all applicable health and safety standards. Impacts to natural resources are minimal. Administrative facilities complement and harmonize with natural settings. The form of structures is derived by the function and from the landscape setting. For example, structures in mountainous, timbered landscapes have steep rooflines and broad eaves and use durable indigenous materials, such as stone and heavy timbers, with the appearance derived from the local environment. Structures, signage, and other built.....

**Comment:** Why are the safe, efficient, cost-effective, and maintained at a function and use level that meets management needs of administrative and storage facilities first on the list or even discussed? This plan is supposed to be about managing the forest, not the USFS facilities. What is most important (by reading this piece) is yourselves; and least important is the people and communities that you are supposed to be serving. We must maintain administrative buildings but don't have the budget to maintain the roads the communities' desire and need. The perspective and the focus are wrong here.

Page 70– Draft Plan - Paragraph 5

**3.3.1 Forest Products**

**Desired Condition:** Land classified as suitable for timber production has a regularly scheduled timber harvest program that provides social and economic benefits while contributing to ecosystem health and sustainability. Land classified as unsuitable for timber production, but where timber harvesting can occur for other multiple-use purposes, has an irregular timber harvest program that contributes to ecosystem health and sustainability while providing benefits to people.

*A predictable supply of timber outputs, known as the allowable sale quantity, contributes to a local forest products industry.*

**Comment:** Desired conditions should include a desire to balance cut or "fuels reduction" with known production so that fire risk can be moving toward a lower risk.

Page 107- Draft Plan

Table 26. Objectives and associated desired conditions for each national forest

Objective Statements	Malheur	Umatilla	Wallowa-Whitman
3.3 Goods and Services			
Contribute to local economies by harvesting sawlogs and timber volume	56 MMBF	56 MMBF	50 MMBF

other than sawlogs  
(TSPQ annually).

**Comment:** Missing a 0, 50 MMBF will not help the economies of the rural areas.

*Page 102 and 103 – Draft Land Management Plan*

*The management approach is designed to restore and maintain scenery, cultural resources, treaty resources, recreation resources, and the wildland urban interface, as well as contribute to economic opportunities for local communities by:*

*Improving the integration of land and resource management with local community and tribal economic development strategies and capabilities  
Improving the quality, diversity, and sustainability of natural resource related jobs and businesses*

*Supporting actions to help achieve the goals of greater economic diversity, resilience, and vitality for rural and tribal communities*

*Developing the utilization of community capacity and infrastructure to the extent practicable to accomplish ecosystem restoration objectives*

*Page 147 and 148 – Draft Land Management Plan*

***Projections of Demand for Goods and Services***

***Timber***

*According to Adams and Latta (2007), regarding future prospects for the timber industry, “The base case projection envisions a substantial near-term decline in eastern Oregon harvest and lumber processing capacity as private harvest falls. In this outlook, industrial lands are unable to sustain recent harvest levels and nonindustrial private forests ownerships do not increase harvest enough to compensate for the loss. Mill numbers decline by roughly one-third, with the largest losses in the Blue Mountains region. Impacts of the harvest decline on log prices are limited because demand contraction (mill closure) closely parallels the shift in supply.”*

*The timber industry surrounding the Blue Mountains National Forests has undergone significant declines in the past few decades. Solid-wood product prices will slightly raise, whereas, prices for paper and paperboard is expected to decline in real terms. These national level reports point to relatively stable supply-demand conditions. While this may be true nationally, it creates a problem locally. The stable end-product or output prices may mean that without advancements in wood processing technology, log prices may remain low and not induce investments for local log supply or increased imports. Without a sufficient and reliable supply of logs, it is likely there will be continued reductions in wood product processing capacity.*

*Page 181 – Draft Environmental Impact Statement – Volume 1, Chapter 3*

***Timber Product Manufacturing Infrastructure and Economics***

*The ability of the Forest Service to positively manage forest vegetation is partially dependent upon the ability to sell forest products to manufacturing companies and to use the harvesting processes, including residual slash disposal activities. If the forest products industry continues to decline in areas surrounding the Blue Mountains to the extent that it is more difficult to sell forest*

*products, or if “stumpage prices” decrease significantly, it would affect the number of acres that could be treated during the planning period.*

**Comment:** As the discussion in the three excerpts above show: without a viable timber industry the northeast Oregon infrastructure and economy will be further adversely impacted. Additionally, without a viable timber industry the public lands cannot be restored without the loggers to do the restoration work and the mills to utilize the raw material (logs).

*Page viii – Volume 1*

***Economic and social well-being.** Annual timber harvest would be about 162 million board feet, resulting in about 1,220 jobs associated with timber harvest and primary wood products manufacturing. There would be an estimated 266,600 cattle and sheep AUMs, supporting about 170 jobs. Forest Service ecosystem restoration expenditures would be about \$25 million, supporting about 470 jobs. Forest Service budget expenditures would be about \$61.4 million, supporting about 1,150 jobs. The total number of jobs expected would be 4,496 jobs.*

**Comment:** This isn't even close to the amount of wood that is being grown each year.

*Page ix – Volume 1*

*Economic well-being is a condition that enables people to work, provide income for their families, and support the economies of local communities, American Indian tribes, the region, and the Nation. The contributions of the national forests to economic well-being are described for capital and wealth and for the economic production of goods and services. However, there are many other values, benefits, and costs not addressed in discussions of economic well-being because they are not traded in the marketplace. These values are difficult to express in monetary terms or other quantitative measures, but are an important part of social and economic sustainability*

**Comment:** It needs to be recognized that Wallowa County has an adopted Custom and Culture that needs to be addressed legally in this document. The Wallowa County Natural Resource plan has been adopted and approved. This plan needs changed to be compatible with the counties plan.

*Page 107– Volume 1*

*Table 54. Current contribution of the Forest Service to the Wallowa-Whitman socio-economic impact zone excluding fire suppression dollars. (Bottom of the page)*

*National Forest Percent of Total Employment (jobs) = 4.6%*

**Comment:** It is a sad state of affairs when the USFS owns 57% of the land in the county and only contribute 5% of the jobs and labor income. Especially when there is so much that needs to be done to make the forests fire resistant, resilient and healthy. This plan falls way short of the needed and available actions on the national forest lands.

*Page 109– Volume 1 (Last Paragraph)*

*The people in the Blue Mountains SRU are extremely outdoor oriented in work and play, linked to the core with grazing, agriculture and timber management. They have created communities*

*which are relatively safe and family-oriented, and which comfortably absorb newcomers who make an effort to fit in. Residents pride themselves on self-sufficiency and interdependence and want government influence to be practical, effective, and minimal. (James Kent and Associates 2006)*

*Although the statement was specific to residents in a subset of all the counties addressed in the socio-economic impact zones, it generally fits throughout.*

**Comment:** good statement.

*Page 181 - Volume 3, Appendix A*

***Table A-10. A list of primary goals and corresponding desired conditions identified to meet the goals***

***Goal 3: Promote Economic Well-Being***

**Comment:** Livestock grazing and timber harvest are also a social well-being issue. These industries are as much a social/cultural piece of the fabric of our rural communities and most of the above topics.

*Page 196 - Volume 3, Appendix A (third paragraph)*

***Goal 2: Promote Social Well-being***

*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.*

**Comment:** Add logging to the list.

*Page 204 - Volume 3, Appendix A (last paragraph)*

***3.3.2 Livestock Grazing***

***Desired Condition:*** *Grazing allotments contribute to a predictable supply of livestock forage that contributes to local ranching operation sustainability and local community growth while maintaining or achieving ecological desired conditions.*

**Comment:** Note, it says sustainability is important. For these permits to be sustainable they need not have so many rules that they cost more than they are worth.

## **Soils**

*Page 228 – Draft Environmental Impact Statement – Volume 1, Chapter 3*

*In the late 1900s, timber managers throughout the Blue Mountains were also faced with increased forest health issues and wildfire concerns (Everett et al. 1994). The resultant management of large acreages of overstocked stands required the use of efficient, less costly, low ground pressure mechanized harvest and yarding equipment to thin overstocked stands, harvest timber and the use of prescribed fire to reduce fuel loads and fire hazard. Research and local soil monitoring summarized in the following pages indicate a corresponding overall reduction in adverse soil impacts to the soils during the second era (USDA Forest Service 2001).*

**Comment:** Good comment on the changes.

*Wildland fires or prescribed fires characteristic of the historic fire regime with low or moderate burn severities can improve soil fertility by facilitating periodic release of nutrients (USDA Forest Service 2006). However, high intensity, long duration fires that result in high burn severity can have significant impacts on ecosystem processes due to the total consumption of the forest floor and the loss of coarse woody debris that serve as nutrient reserves for long term storage of forest nutrients necessary for sustaining plant growth, biological activity (Harvey et al. 1987), and soil erosion, especially on steep slopes. Loss of the forest floor effective ground cover and coarse woody debris has been related to an increase in sheet, rill, and gully erosion and reduced infiltration rates leading to increased rates of erosion, sedimentation and flooding*

**Comment:** The above excerpt from the DEIS shows that without a more aggressive alternative than is presented in the DEIS that catastrophic wildfire will result in soil loss, change in soil chemical composition, vegetative habitat loss and possible mass failure (i.e. Tanner Gulch) into fish bearing streams.

Page 241– Volume 1

*The process for assigning risk classes for grazing included determining the overlap of land type associations with grazing suitability maps for each alternative. Each grazing suitability class was assigned a rating of low, moderate, or high (pers. comm. Steve Howes 2011). Rating of low risk to soils from grazing was given to land type associations rated with high suitability. A rating of moderate risk to soils from grazing was given to land type associations rated with low to moderate suitability. A rating of high risk to soils from grazing was given to land type associations rated unsuitable for grazing. Unsuitable grazing lands generally included land type associations associated with steep slopes, very shallow and rocky soils, and/or sites producing less than 200 pounds of forage annually.*

**Comment:** This process doesn't address risk of soil impacts. Highly rocky soil should have a low risk. Why does a very unproductive location pose a high risk to soil damage (these soils usually have very high rock content and thus protect the soils).

Page 242 – Volume 1 (End of Paragraph 2)

*Assessment of the areal extent of detrimental soil conditions for the plan area and even high use areas is difficult due to the scale of grazing lands and the dynamic nature of management strategies. Livestock grazing effects on soils will generally be concentrated in areas most heavily used by livestock, including corrals, trails, around salting sites, and at water developments and other water sources.*

**Comment:** Where is the discussion of recovery from compaction with freezing and thawing over time? Impacts of grazing systems on soil compaction and pasture production in Alberta, N. T. Donkor, J. V. Gedir, R. J. Hudson, E. W. Bork, D. S. Chanasyk, and M. A. Naeth. Department of Agricultural, Food and Nutritional Science, University of Alberta, Edmonton, Alberta, Canada. T6G 2P5. Received 9 March 2001, accepted 12 September 2001.

Freeze-Thaw Cycles Effects on soil  
Compaction in a Clay Loam

**Authors:** Jabro, J.; Evans, R.; Iversen, W.

**Affiliation:** AA(NPARL USDA-ARS, Sidney, MT 59270, United States bill.iversen@ars.usda.gov), AB(), AC()

**Publication:** EGU General Assembly 2012, held 22-27 April, 2012 in Vienna, Austria., p.1688

The general consensus in these articles is that freeze-thaw cycles can reduce compaction in the surface horizons, but is much less effective at reducing compaction in deeper horizons that are compacted by large equipment.

Compaction by livestock is generally mostly an issue near the soil surface, so freeze-thaw cycles should be effective at reducing compaction on grazing lands. Most of the research is from northern States (Minnesota, Wisconsin) and Canada. The degree to which freeze-thaw will reduce compaction will depend on the intensity and duration of cold temperatures, and snow depths. (Referenced from NRCS soil scientist in Portland OR. (Steve Campbell).

*Page 242– Volume 1 (End of Paragraph 4)*

*use, access to dispersed campsites, and concentrated use near water can impact soils (Eckert et al. 1979 and Lei 2007).*

**Comment:** Many riparian areas are heavily impacted by campsites and fishermen. These need expanded and vetted just like grazing and timber activities.

*Page 242 – Volume 1*

#### *Soil Restoration*

*There are numerous soil restoration opportunities available as mitigations to offset impacts of management activities, in addition to restoration to reduce existing detrimental soil conditions. Examples include subsoiling to reduce soil compaction associated with roadbeds, skid trails, and landings; road decommissioning and obliteration; biochar; biosolids and other organic matter additions; seeding with native vegetation; use of biological organisms and nitrogen fixing shrubs and trees to help restore nutrient cycling processes on degraded sites; and implementation of soil erosion control measures. Restoration effectiveness in reducing detrimental soil conditions and improving soil function is highly variable. Selection of restoration treatment depends on the purpose and objective selected for the site-specific area. The purpose of soil restoration often is to improve dynamic properties to aid natural soil functions in the restoration process over time (e.g., improved infiltration and water holding capacity of soils, vegetation and root growth, organic matter accumulation, and fertility).*

**Comment:** This causes more damage to the watershed than any other activity on the land. It uses heavy equipment, soil disturbance and movement and leaves a huge open wound on the landscape ripe for weed invasions and erosion.

**Comment:** Non-native works much better when seeding following disturbance to reduce weed invasion and to supply forage. History says if you use non-persistent species natives come in fine.

*Page 243 – Draft Environmental Impact Statement – Volume 1, Chapter 3*

*Depending on location, freeze/thaw cycles may also serve to rehabilitate soil compaction if the depth of freezing is consistent with the depth of compaction.*

**Comment:** This is the observed situation that has occurred on private timber lands in Wallowa County.

*Page 244 – Volume 1 (End of Paragraph 2)*

*An example of this is subsoiling of road beds, which reduces compaction and increases infiltration, but soils remain detrimentally disturbed because the original topsoil is still displaced (Bliss 2006 and Powell 2005).*

**Comment:** Not sure if the authors are just in love with sub-soiling or if they also sell and operate the equipment for the effort. We see very little sub-soiling anymore and it leaves the landscape open for erosion and weeds.

## **SPECIES DIVERSITY**

*Page 118 – Draft Plan*

*Species Diversity*

*WLD-HAB-6 S-1 Standard*

*Activities that have potential to cause abandonment or destruction of known denning, nesting, or roosting sites of threatened, endangered, or sensitive species shall not be authorized or allowed within 1,200 feet of those sites.*

**Comment:** Nearly a quarter of a mile, regardless of situation? What if cliffs etc. are present? If they are, then the standard is to extreme. This is not just when critters are in nest etc. but all the time.

*Page 156 – Volume 1*

*Large Wild Ungulates*

*It is expected that this situation will continue with relatively stable large wild ungulate populations (with natural fluctuations) and a slow decline in permitted livestock (or in the case of some of the alternatives, a rapid and significant decrease in permitted livestock).*

**Comment:** Elk above MO's should be included in this plan to move the USFS to action requesting ODFW to manage these herds appropriately.

## **WOLVES**

*Page 245 - Volume 2 (Last Paragraph)*

*Wisdom et al. (2000) suggested four major challenges to wolf conservation within the Interior Columbia Basin: excessive mortality from humans, mortality related to roads, displacement from habitat by human activities, and population isolation.*

**Comment:** The last two of these challenges are not needed. The evidence from Wallowa County is that wolves frequent places of human presence as much as other places. Until we begin to make them fear us this is not a true statement and not backed up by any evidence. As to population isolation, with the scale

that wolves roam, isolation has to be discussed in hundreds of miles not watersheds or ridges. These wolves are traveling back and forth between Oregon, Idaho and Washington with ease, isolation is not a problem.

*Page 247 - Volume 2 (Paragraph 2)*

*However, most of the known wolf mortality that has occurred within the DPS has been in response to livestock depredations.*

**Comment:** Again, this is a false statement. A small number of those killed are due to livestock depredation. Most of the wolf mortality is either natural deaths, parvo, fighting among selves, pup mortality or hunting in Idaho and Montana. In Oregon very, very few wolves have been killed due to depredation (no more than 5, two in Keating and three in Wallowa County)

*Page 248 - Volume 2*

*of human disturbance. Of the action alternatives, alternative C would have the most acres allocated to such management areas followed by alternatives E, F, and B. Alternative D would have the least.*

**Comment:** It is not the USFS job or responsibility to manage the wolf. These writings are based on documents that must have been written before we experienced the wolf because these assumptions made by the author are not being followed by the wolf. The wolves have every opportunity to den and rendezvous in the wilderness with no roads and low densities. They didn't. They could stay up in the wilderness. They don't. They could stay out of the valley and the Zumwalt, they don't. They go where there is food. Since the food feels safer close to us, they come closer to us. This section needs shortened to "Wolves are habitat generalists". We don't need to manage for this species, they are doing just fine on their own. Again the USFS should not be involved in managing the wolf in Oregon!

*Page 250 - Volume 2*

*Wallowa-Whitman National Forest – The Wallowa-Whitman National Forest is occupied by at least one pack and the entire national forest is within the area where the wolf was delisted; as such, the wolf is considered a sensitive species for the national forest.*

**Comment:** As of July 11, 2014, ODFW identifies 9 packs on their website and eight of them are in this three forest area!

*Page 269 - Volume 2 (Paragraph 4)*

*Gray wolf populations are increasing in eastern Oregon and this trend is likely to continue during the short term due to high prey populations, decreasing open motor vehicle route density across the Blue Mountains and management direction to protect denning wolves.*

**Comment:** Nearly all of these statements are false and should be removed from the USFS document. It is true that the wolf populations are increasing, but not due to decreasing open motor vehicle route densities or from management direction to protect denning wolves. It is due to the fact that no one can manage them, they are habitat generalists and they have no natural predators that are allowed to harm them. Additionally wolves prefer to use roads to travel on. Earlier you indicated that one of the major threats to wolves was vehicular deaths. Those happened on roads.

*Over the long term, human social pressures will likely restrict the distribution of wolves to areas of limited human occupation and away from concentrated domestic livestock production. In the end, the cumulative effect of human tolerance and persecution will have to change to achieve long-term successful recovery.*

**Comment:** These bias statements do not have validity and lead the reader to believe that the authors want to use social engineering to "save the wolf and close roads on the forest lands. This kind of "guess" stated as cumulative effect is inappropriate. This paragraph should be removed.

## **Timber**

### **Timber - Harvest & Silviculture**

Page 36/37- Draft Plan - Last Paragraph

#### *1.6 Structural Stages*

**Existing Condition:** In the Blue Mountains many changes to forest stand structure have occurred due to disturbances, such as wildfire, timber harvest, and insects and disease disturbances. There has been a loss of large (20 inches d.b.h. and larger) and medium (15 to 20 inches d.b.h.) trees across the landscape. The old forest single-story stage within the dry upland forest PVG has been greatly reduced from pre-1900 levels. The amount of old forest within the moist and cold upland forest potential vegetation groups is believed to be within the range of what occurred historically on the landscape, although there have been shifts from single-storied to multi-storied conditions in many areas.

**Comment:** Is there a loss of 15-20 in. trees? My understanding of Lower Joseph Creek was that we had too many of these?

Page 49 - Draft Plan –Table 8

#### *1.14 Snags and Down Wood*

Page 91– Draft Plan - Paragraph 4

#### *MA 4A General Forest*

**Desired Condition:** *General forest contributes to the variety of native plant communities and the composition, structure, and patterns defined in the desired conditions. While the landscape is predominantly natural in appearance, there are some locations where the vegetation composition, structure, density and/or pattern is altered to meet short- or long-term management objectives that move the landscape towards the desired conditions. The area is maintained through ecological processes, as well as management activities. This management area contributes important habitat for aquatic, plant and wildlife species that benefit from functional habitat. Additionally, the area supplies a variety of dispersed or developed summer and winter recreational activities. Recreational use is generally dispersed and/or located at recreation developments, such as campgrounds with higher use levels. Facilities (whether Forest Service or permitted) are those necessary to provide public or resource benefit, or provide for safety. This*

*area has Forest Service system and other authorized routes. A wide spectrum of travelway types are present, ranging from maintenance level 1 through 5 roads (closed roads to highways) to trails that serve as recreational features themselves. The recreation opportunity spectrum in MA4A is roaded natural.*

**Comment:** Again, this lead with " it contributes to the variety of native plants....." this is general forest. Leave something that is not so restrictive that you can be sued if you sneeze.

Page 104-Draft Plan-Paragraph 1

*Table 26. Objectives and associated desired conditions for each national forest*

<i>Objective Statements</i>	<i>Malheur</i>	<i>Umatilla</i>	<i>Wallowa-Whitman</i>
<i>hydrologic function by:</i>	<i>7,800 acres (annually)</i>	<i>6,600 acres (annually)</i>	<i>7,300 acres (annually)</i>
<i>• Improving forest vegetative conditions (acres) (WHI)</i>			

**Comment:** Even in Wallowa County there are 150 to 200 thousand acres we are allowed to enter. At this rate, assuming a third to our county, it would take 90 years to get there. Way too small.

Page 129 –Draft Plan

**Individual Old Trees**

*(guidelines apply to all three national forests)  
OF-1 G-59*

**Guideline**

*Management activities within and outside old forest stands should generally emphasize retaining live trees with certain old tree characteristics. For most tree species, old trees are generally considered to be greater than 150 years in age. However, tree characteristics and old age may vary by species and site. A description of these characteristics and*

**Comment:** Inside and outside means everywhere? Is that what they meant? Maybe so.

Page 25 – Volume 1

**Timber and Wildland Fire**

- The majority of forest vegetation restoration treatments would be scheduled in dry forest groups*
- No harvest would be scheduled within areas determined to be unsuitable for timber production due to concerns about sensitive soils or difficulty regenerating sites within five years*

**Comment:** Narrow minded, short sighted plan. In no way is this ecosystem management nor is it forest wide. You are sentencing the rest of the forest to disaster.

**Comment:** Why do you keep giving away the farm before even starting? Why not let watershed assessments tell us where to manage.

Page 97– Volume 1 (Last Paragraph)

*Annual timber volume harvested from the three national forests, excluding fuelwood, has declined dramatically, from a high of almost 600 million board feet during the early 1990s to about 50 million board feet in 2010. Harvest on all other ownerships has also declined during the same period. The recent three-year average timber harvest by national forest is displayed in table 40. Non-sawtimber includes pulpwood and biomass, such as clean chips. Fuelwood includes both personal and commercial use.*

**Comment:** This is a false statement for our county. Commercial timberland in Wallowa County has been up or stable in production.

**Comment:** This states that timber harvest has declined and in 2010 was 50 mbf, this is what the USFS says they will harvest each year in table 26, page 107 of the draft plan. Does not look like the USFS wants to improve this harvest?

Page 120 – Volume 1

**Table 72. Acres of timber harvest annually by national forest**

<i>National Forest</i>	<i>Alt. A</i>	<i>Alt. B</i>	<i>Alt. C</i>	<i>Alt. D</i>	<i>Alt. E</i>	<i>Alt. F</i>
<i>MAL</i>	<i>7,100</i>	<i>7,100</i>	<i>3,400</i>	<i>20,500</i>	<i>12,500</i>	<i>8,300</i>
<i>UMA</i>	<i>5,200</i>	<i>5,100</i>	<i>2,300</i>	<i>15,600</i>	<i>10,600</i>	<i>6,400</i>
<i>WAW</i>	<i>4,500</i>	<i>4,550</i>	<i>2,050</i>	<i>16,250</i>	<i>9,350</i>	<i>6,050</i>

**Comment:** This is so low it will stop any meaningful restoration efforts. If Lower Joseph Creek proposes 20,000 acres in 4 years then that would leave only 5,000 acres for the rest of the whole forest? This is a continuation of the refusal to accept the need to manage the forests.

**Timber Harvest and Silviculture**

*(standards and guidelines apply to all three national forests)*

Page 123 and 124 – Draft Land Management Plan

*FOR-1  
S-11*

**Standard**

*Clearcutting, shelterwood, and other even-aged regeneration harvest methods shall be used only when an interdisciplinary team/line officer has determined that protection can be assured for resources, such as soil, watershed, fish, wildlife, recreation, aesthetics, and the regeneration of the timber resource. It shall also be determined as the optimal harvest method.*

*FOR-2  
S-12*

**Standard**

*Forest openings created by the application of even-aged regeneration harvest methods shall be limited to a maximum size of 40 acres. Exceptions are permitted on an individual basis after a 60-day public notice period and review by the regional forester. This maximum size opening limitation does not apply to areas harvested after large scale disturbances resulting from wildfire, insects, disease, windthrow, or other catastrophic events.*

FOR-3  
S-13

**Standard**

*Cut blocks, patches, or strips created by the application of even-aged regeneration harvest methods shall be shaped and blended with the natural terrain.*

FOR -5  
G-37

**Standard**

*Stands shall generally have reached the culmination of mean annual increment of growth as per NFMA sec.6 (m) prior to harvest. This does not preclude the use of thinning or other stand improvement measures or salvage or sanitation harvesting of timber stands that are substantially damaged by fire, windthrow, or other catastrophic event or that are in imminent danger of insect or disease outbreaks. Exceptions: after consideration of multiple uses, include other activities, such as cutting for experimental and research purposes, removing particular species of trees, improving wildlife habitat, range, or recreation resources.*

**Comment:** All of the above Standards (FOR-1, FOR-2, FOR-3, FOR-5) might be acceptable in forested stands that are not in such high risk of catastrophic destruction (*Page 4 – Draft Environmental Impact Statement – Volume 1, Chapter1: To address management of fuels and fire risk. Changing vegetative conditions have made forests more susceptible to disturbances, such as uncharacteristically severe fires, insects and disease*). Change these standards to guidelines until the forested stands can respond to disturbances that fall within the Historic Range of Variability.

FOR-6  
G-38

**Guideline**

*Silvicultural treatments should include provisions to avoid detrimental changes in water temperatures, blockages of water courses, and deposits of sediment.*

FOR-7  
G-39

**Guideline**

*Timber harvest projects should include provisions for the maintenance or restoration of soil and water resources, including protection for streams, stream banks, shorelines, lakes, wetlands, and other bodies of water.*

FOR-8  
G-40

**Guideline**

*Silvicultural treatments should be developed through interdisciplinary review that considers multiple use of the general area and ensures that the harvest systems used are not selected primarily because they give the greatest dollar return or the greatest unit output of timber.*

FOR-9  
G-41

**Guideline**

*Timber harvest should not cause irreversible damage to soil, slope, or other watershed conditions.*

FOR-10 **Guideline**  
G-42

*Timber harvest on lands not suitable for timber production should occur only to meet multiple-use purposes other than timber production.*

**Comment:** We agree with these guidelines.

Page 234 – Volume 1 (Table 120)

**Table 120. Acres of ground-disturbing activities associated with timber harvest and fuels reduction treatments projected annually for each alternative for each national forest**

<b>Wallowa-Whitman</b>						
<i>Even-aged regeneration harvest*</i>	90	1,000	500	2,500	2,000	1,400
<i>Uneven-aged and intermediate harvest</i>	4,410	3,550	1,550	13,750	7,350	4,650
<b>Timber harvest totals</b>	<b>4,500</b>	<b>4,550</b>	<b>2,050</b>	<b>16,250</b>	<b>9,350</b>	<b>6,050</b>
<i>Planting</i>	50	500	200	1,200	1,000	700
<i>Precommercial thinning</i>	2,600	2,600	1,700	5,200	2,600	2,600
<i>Burning and mechanical treatment of fuels**</i>	15,000	15,000	12,550	17,000	19,850	16,550

**Comment:** There are about 130,000 acres available for harvest in Wallowa County. Even though that number is pathetic, it alone would require over 6,000 acres a year to accomplish those needs in a twenty year rotation. Just in Wallowa County.

Page 104 – Volume 2

**Table 251. Annual acres of harvest for each alternative for the Wallowa-Whitman National Forest**

Alternative B is the proposed action, as modified based on public scoping.

**Comment:** In no way do these acres support moving the forest ground toward a more resilient and safer forest. The forest will continue to burn, burn, burn.

Page 185- Volume 2 ( first bullet)

- *Changes in forest structure and composition that may contribute to uncharacteristic wildfire behavior in lower elevation forest types*

**Comment:** Not just lower elevation forest types. These types exist all the way to the top of the mountain.

Page 278 - Volume 2 (Last Paragraph)

*It is unlikely that a large area of the landscape was devoid of snags due to the various disturbance regimes (fire and insects and disease) that historically were at work. It follows then that where 75 percent of the landscape is identified as being in the range of zero to 2 snags per acre in Mason and Countryman (2010), this should not be interpreted as 75 percent of the landscape had zero snags, but rather that snags existed in low numbers.*

**Comment:** It is our understanding that the survey was conducted from the window of a vehicle most of the time. It was not a random method or covered non-roaded area and if so, this should not be the source of the current conditions.

*Page146 – Draft Environmental Impact Statement – Volume 2, Chapter 3*

*Alternative D would result in the closest achievement of the desired conditions for stand densities. Under alternative D, the projected percent of the dry upland forest potential vegetation group in open and closed forest would vary from the desired condition ranges by a summed total of approximately 6 percent at year 50.*

**Comment:** Even this most aggressive alternative (D) takes 50 years. The question remains: Do we have 50 years with the condition of the existing forest or will we be starting over????

*Page157 – Draft Environmental Impact Statement – Volume 2, Chapter 3*

*Lower stand densities and a more open forest structure would result in decreased competition between trees for moisture, nutrients, and sunlight, which would increase tree health, growth, and vigor, decrease susceptibility to insects and diseases, decrease the risk of insect attack and mortality, decrease continuity of preferred tree species and age and size classes, and improve overall forest health.*

**Comment:** We agree with this paragraph. The only question is “why don’t you manage the forest to get to this?” The pace and scale of this restoration in the plan does not allow for large acres to be like this.

*Page161 – Draft Environmental Impact Statement – Volume 3, Appendix A*

*PACFISH and INFISH Timber Management in RHCAs*

**Standard TM-1.** *Prohibit timber harvest, including fuelwood cutting, in Riparian Habitat Conservation Areas (RHCAs), except as described below. Do not include RHCAs in the land base used to determine the Allowable Sale Quantity; however, any volume harvested can contribute to the timber sale program.*

- a) *Where catastrophic events such as fire, flooding, volcano, wind, or insects cause damage that results in degraded riparian conditions, allow salvage and fuel cutting in RHCAs only where present and future woody debris needs are met, where cutting would not retard or prevent attainment of other riparian management objectives (RMOs), and where adverse effects can be avoided to aquatic resources. Ecosystem Analysis at the Watershed Scale shall be completed prior to harvest, including salvage and fuel wood cutting, in RHCAs.*
- b) *Apply silvicultural practices for RHCAs to acquire desired vegetation characteristics where needed to attain RMOs. Apply silvicultural practices in a manner that does not retard attainment of RMOs and that avoids adverse effects on aquatic resources.*

**Comment:** We agree with everything stated above in regards to PACFISH and INFISH Timber Management in RHCAs except that these areas should be in the land base as Lands Suitable for Timber Production and be used to determine Allowable Sale Quantity. Without the push by the Washington

Office and Regional Office to manage these lands, they will stay untreated and move to higher and higher risk of catastrophic destruction.

## **Timber - Suitable Acres & Allowable Sale Quantity**

*Page 12 – Draft Land Management Plan*

*Located on the eastern edge of the Blue Mountains, the Wallowa-Whitman National Forest consists of more than 2.4 million acres, which includes the Hells Canyon National Recreation Area in Idaho.*

**Comment:** Information used in other comments.

*Page 32 – Draft Land Management Plan*

*Productive Capacity*

*Gross growth was estimated to be 1.7 billion board feet per year. Mortality was estimated to be 774 million board feet per year. Net growth for eastern Oregon was estimated at 791 million board feet of timber. High net growth rates can contribute to problems with overstocking and increased fire hazard. The current removal rate for timber volume in the Blue Mountains is far less than net growth.*

**Comment:** The Allowable Sale Quantity (ASQ) in alternative D (most aggressive presented) is 236 million board feet per year (*Page 169 – Draft Environmental Impact Statement – Volume 2, Chapter 3, Tables 294, 295, and 296*). That removal rate is less than 30% of the net growth per year. Again, the pace and scale of restoration is in reverse. Long-term sustained yield is not being approached (*Page 170 – Draft Environmental Impact Statement – Volume 2, Chapter 3.... In plain language, once desired conditions are achieved, harvest would not exceed growth so that desired conditions would be maintained over time*).

*Page 41 – Stand Density*

*Within the dry upland forest potential vegetation group, the percent of the potential vegetation group in closed stand densities ranges from approximately 40 to 70 percent in the Blue Mountains, compared to a desired condition of 5 to 20 percent. The major changes during the last 100 years across the Blue Mountains may have reduced biodiversity and created a landscape condition dominated by dense and multi-storied stands, creating a visual composition that lacks diversity and is atypical of historic mosaic conditions. These changes are most apparent in the dry upland forest types. This contributes to the potential for uncharacteristically severe and large disturbances due to wildfire, insects, and disease. These conditions could create an unsustainable system.*

**Comment:** We agree. However, the conditions will create an unsustainable system, not could.

*Page 51 – Draft Land Management Plan*

*Scenic Stability*

**Existing Condition:** *In many areas the long-term stability of scenery resources is at risk of large scale impacts due to conditions exacerbated by past wildfire suppression and harvest practices. The resultant conditions of homogenous, overly dense forests of nonfire-resistant species heavily laden*

*with fuels put scenery resources at risk from uncharacteristically large, stand-replacing wildfires and insects and disease disturbances.*

**Comment:** To reduce the risk of losing long-term stability of scenery resources, a much more aggressive approach is needed than is shown in these alternatives or documents.

*Page 63 – Draft Land Management Plan*

#### *Wildland-urban Interface*

*Vegetation treatments within the wildland-urban interface areas are based on wildfire protection objectives, which may over-ride ecological desired conditions. Vegetative structure would result in fire intensity that allows for safe and effective suppression actions within wildland-urban interface areas. In general, vegetation density would be more open, with lighter fuel loadings, in comparison to areas outside wildland-urban interface. Fire risk within wildland-urban interface areas would be managed so as not to limit the ability to use fire for resource restoration in areas adjacent to wildland-urban interface areas.*

**Comment:** This type of management (that is proposed in the wildland-urban interface) is needed throughout the three national forests to increase the pace and scale of restoration.

*Page 98 – Draft Land Management Plan*

#### ***Restoring and Maintaining Terrestrial Vegetation Conditions***

*Implementing appropriate invasive plant prevention practices to help reduce the introduction, establishment, and spread of invasive plants associated with management actions and land use activities*

*Modifying stand conditions to reduce the likelihood of uncharacteristically severe disturbances from wildfires and insects and disease*

*Improving the geographic extent, connectivity, and stand structure of plant and animal habitat*

*Creating a landscape better able to respond in a positive way to climate change*

*Concentrating active restoration activities (timber harvest, fire, and thinning) primarily, but not exclusively, in the dry environment, as the dry vegetation type is generally the most departed from the desired condition*

*Concentrating active restoration in areas with established road systems and previous treatments (plantations, past thinning areas, etc.)*

*Emphasizing treatments in wildland-urban interface, municipal watersheds, other areas of high social values*

*Using planned and unplanned fire to accomplish restoration objectives*

**Comment:** Again, a more aggressive alternative is needed to achieve the above results than is presented in these alternatives and documents.

To create a landscape that is more resilient and better able to respond to climate change, management activities will be designed to maintain specific conditions, such as:

*A larger portion of the landscape that contains larger diameter overstory trees with reduced amounts of smaller diameter understory trees*

*Longer forest stand rotations*

*Greater abundance of early seral tree species (ponderosa pine and larch)*

*Fewer multi-storied stands*

*Lower stand densities, especially in areas that are uncharacteristically dense.*

*Planting of tree species (includes genetic considerations) that are likely to be better adapted to the expected climate and changed species distribution*

*The increased use of biomass for alternative uses as demand increases and technology becomes available*

*Conditions that are less susceptible to invasive species*

**Comment:** Again, a more aggressive alternative is needed to achieve the above results than is presented in these alternatives and documents.

**Allowable Sale Quantity**

*One key decision of the forest plan is the identification of the allowable sale quantity of timber. The allowable sale quantity is the average annual amount of commercial timber that can be harvested from National Forest System lands that are suitable for timber production. Although the allowable sale quantity is identified as an average annual quantity, the amount produced in any one year may surpass the identified allowable sale quantity so long as the totals per decade are not exceeded. The allowable sale quantity is measured in million board feet (MMBF).*

*Table 28. Allowable sale quantity for each national forest*

<b>National Forest</b>	<b>MMBF</b>
Malheur National Forest	55
Umatilla National Forest	51
Wallowa-Whitman National Forest	46

**Comment:** ASQ presented here for the preferred alternate (E) is less than 20% of the annual net growth. Increased pace and scale of restoration in reverse. Long-term sustained yield is not being approached (Page170 – Draft Environmental Impact Statement – Volume 2, Chapter 3 *In plain language, once desired conditions are achieved, harvest would not exceed growth so that desired conditions would be maintained over time.*)

**Table 291. Lands tentatively suitable for timber production (step A of 36CFR 219.14)**

<b>Category</b>	<b>MAL</b>	<b>UMA</b>	<b>WAW</b>
<b>1. NFS lands total (acres)</b>	<b>1,700,000</b>	<b>1,400,000</b>	<b>1,800,000</b>
<i>a. Non-forest land</i>	215,000	199,000	250,000
<i>b. Potential for irreversible damage</i>	0	0	0
<i>c. No assurance of adequate</i>	139,000	37,000	150,000
<i>d. Forest land withdrawn from</i>	101,000	347,000	390,000
<b>2. Total unsuitable land (acres)</b>	<b>455,000</b>	<b>583,000</b>	<b>790,000</b>
<b>3. Tentatively suitable forest land</b>	<b>1,245,000</b>	<b>817,000</b>	<b>1,010,000</b>

**Table 292. Acres suitable for timber production**

<b>National Forest</b>	<b>Tentatively Suitable</b>	<b>Alt. A</b>	<b>Alt. B</b>	<b>Alt. C</b>	<b>Alt. D</b>	<b>Alt. E</b>	<b>Alt. F</b>
<i>MAL</i>	1,245,000	780,000	770,000	530,000	1,080,000	770,000	770,000
<i>UMA</i>	817,000	380,000	420,000	260,000	610,000	420,000	420,000
<i>WAW</i>	1,010,000	590,000	530,000	310,000	770,000	530,000	530,000

**Table 293. Lands suitable for timber production as a percentage of National Forest System lands (forested)**

<b>National Forest</b>	<b>Alt. A</b>	<b>Alt. B</b>	<b>Alt. C</b>	<b>Alt. D</b>	<b>Alt. E</b>	<b>Alt. F</b>
<i>MAL</i>	52	52	35	72	52	52
<i>UMA</i>	35	38	24	55	38	38
<i>WAW</i>	37	33	19	48	33	33

**Comment:** Comparing Tables 291 to Table 292 and 293 shows that under the most aggressive alternative (D) that 52% of the Wallowa – Whitman National Forests is open and available for catastrophic wildfire.

**Table 294. Malheur National Forest timber sale program quantity (TSPQ), allowable sale quantity (ASQ), and long term sustained yield capacity (LTSYC) (million board feet per year)**

<b>Activity</b>	<b>1990 Forest</b>	<b>Alt. A</b>	<b>Alt. B</b>	<b>Alt. C</b>	<b>Alt. D</b>	<b>Alt. E</b>	<b>Alt. F</b>
<i>TSPQ</i>	234-plus	30	31	16	87	56	37
<i>ASQ</i>	234	55	55	34	88	55	55
<i>LTSYC</i>	234-plus	86	86	59	125	86	86

**Table 295. Umatilla National Forest timber sale program quantity (TSPQ), allowable sale quantity (ASQ), and long term sustained yield capacity (LTSYC) (million board feet per year)**

<i>Activity</i>	<i>1990 Forest</i>	<i>Alt. A</i>	<i>Alt. B</i>	<i>Alt. C</i>	<i>Alt. D</i>	<i>Alt. E</i>	<i>Alt. F</i>
TSPQ	159	27	29	16	76	56	36
ASQ	124	51	51	31	73	51	51
LTSYC	184	53	53	32	79	53	53

**Table 296. Wallowa-Whitman National Forest timber sale program quantity (TSPQ), allowable sale quantity (ASQ), and long term sustained yield capacity (LTSYC) (million board feet per year)**

<i>Activity</i>	<i>1990 Forest</i>	<i>Alt. A</i>	<i>Alt. B</i>	<i>Alt. C</i>	<i>Alt. D</i>	<i>Alt. E</i>	<i>Alt. F</i>
TSPQ	206	24	27	15	80	50	34
ASQ	141	46	46	22	75	46	46
LTSYC	215	66	66	38	100	66	66

**Comment:** Tables 294, 295, and 296 used as information in comments.

Page 170 – Draft Environmental Impact Statement – Volume 2, Chapter 3

*Long-term Sustained Yield Capacity Effects*

Long-term sustained yield capacity (LTSYC) is the maximum amount of timber volume that can be sustainably harvested on lands suitable for timber production once the desired future conditions have been achieved. Long-term sustained yield capacity was summarized for the future time period of year 200 to 300. Generally, long-term sustained yield capacity is equivalent to annual increment. In order for yield or timber harvest to be sustainable in the long-term, annual yield or harvest would be equivalent to annual growth. In plain language, once desired conditions are achieved, harvest would not exceed growth so that desired conditions would be maintained over time. Long-term sustained yield capacity is calculated based on the determination of yield by prescription from regenerated stands, including, where appropriate, intermediate yields selected in the solution for a specific alternative. Calculations of long-term sustained yield capacity were not constrained by budget. The decadal allowable sale quantity cannot exceed long-term sustained yield capacity.

**Comment:** Used as information in other comments.

Page 172 – Draft Environmental Impact Statement – Volume 2, Chapter 3

**Table 297. Annual harvest as a percentage of annual net growth**

<i>National Forest</i>	<i>Alt. A</i>	<i>Alt. B</i>	<i>Alt. C</i>	<i>Alt. D</i>	<i>Alt. E</i>	<i>Alt. F</i>
MAL	23%	24%	18%	48%	43%	29%
UMA	39%	38%	34%	69%	74%	47%
WAW	18%	22%	21%	45%	41%	28%

Page 349 and 350 – Draft Environmental Impact Statement – Volume 3, Appendix B

*The allowable sale quantity (ASQ) is the upper limit of the amount of timber volume potentially available for harvest on forestlands suitable for timber production during a specified time period, usually a decade, while moving the landscape towards the desired conditions and while meeting other planning rule requirements. This volume is not a guaranteed harvest volume. Allowable sale quantity is the maximum amount of volume potentially available on timber suitable lands unconstrained by budget. The actual volume offered would be the aggregate of individual project proposals and would be dependent upon a number of factors, including annual budget and organizational capabilities. Actual volumes offered may also include volumes harvested from lands unsuitable for timber production but available for timber harvest, such as riparian management areas and old forest. Allowable sale quantity volume is also described as chargeable volume because it would be applied toward the decadal allowable sale quantity.*

**Comment:** Used as information in other comments.

*Page 350 – Draft Environmental Impact Statement – Volume 3, Appendix B*

*The base schedule is a timber sale schedule formulated on the basis that the quantity of timber planned for sale and harvest for any future decade is equal to or greater than the planned sale and harvest for the preceding decade, and that this planned sale and harvest for any decade is not greater than the long-term sustained yield capacity (see following section). This definition expresses the principle of nondeclining flow. In addition to the long-term sustained yield capacity requirements, the first decade allowable sale quantity must meet the nondeclining flow requirements unless departure from the base schedule is determined to be warranted. The need for considering departures has not been identified at this time, so all of the alternatives would be consistent with the nondeclining flow requirements.*

*Page 351 – Draft Environmental Impact Statement – Volume 3, Appendix B*

*In order for yield or timber harvest to be sustainable in the long term, annual yield or harvest would be equivalent to annual growth. In plain language, once desired conditions are achieved, harvest would not exceed growth so that desired conditions would be maintained over time.*

**Comment:** The above two statements on non-declining flow and long term sustained yield are needed elements to increase the pace and scale of restoration. Harvest too little or too much and these requirements cannot be maintained or met.

## **Timber - Old Forest**

### **Old Forest (suitable for timber production)**

*Page 18 – Draft Land Management Plan*

*Open canopy old forest within the dry vegetation type has declined substantially from historic levels, and the species that rely on this structural stage are declining (Wisdom et al. 2000). Although the status of some species associated with dense old forest multi-story may be increasing, the ecological processes are not sustainable. It will be a challenge to restore old forest and balance the needs of species that rely on dense forests, especially with the moisture stress that climate change may cause on some sites and the associated increase in severity of fires.*

*Page 160- Draft Environmental Impact Statement – Volume1, Chapter 3*

*Old forest positioning on the landscape was not static historically. Rather, old forest*

*probably shifted spatially over time. As some old forest stands succumbed to high severity disturbances, other areas were progressing from mid-aged and mature forest into old forest.*

**Comment:** The above two excerpts show the need to preserve old trees on the landscape, but remove the Old Growth Management Areas (MA-15). Manage the landscape for old forest attributes with a flow of those attributes across the landscape over time.

## **Wilderness/Scenic Waterways & Other Special Places**

### ***MA 1A Congressionally Designated Wilderness Areas***

*(standards and guidelines apply to all three national forests)*

*MA 1A WIL-1 S-19*

#### ***Standard***

*With the exception of permitted livestock, animals other than pack stock and pets (see glossary) shall not be authorized or allowed in wilderness areas.*

**Comment:** No riding horses? All types of livestock are discussed except riding horses. They should be included.

*Page 131 – Draft Plan*

### **MA 1A Congressionally Designated Wilderness Areas within the Wallowa-Whitman National Forest**

*MA 1A WAW-WIL-1 S-20*

#### ***Standard***

*Eagle Cap Wilderness Area visitors shall not be authorized unless they obtain and possess an entry permit.*

**Comment:** So every time someone steps into the wilderness to hunt they are supposed to come to town or go to a trail head and get a permit? This is intrusive and unpractical. The line is so close to the towns that this happens daily and usually without prior thinking or planning. This standard is not even workable.

*Page 132 – Draft Plan*

*WIL-FIRE-4 G-68*

#### ***Guideline***

*Camps should be restored by replacing logs and rocks, recontouring terrain, scarifying soil, and scattering twigs, rocks, and dead branches to discourage use and camouflage entrance points.*

**Comment:** So we want to do more digging and scraping and cutting just to make it look like we were not there. These camp sites are usually used over and over. They are many times around points of interest and others will camp in the same vicinity. If a camp site is a good one let it heal and be used as such. Quit hiding what is known to be occurring.

*The need for additional wilderness designation in the Blue Mountain national forests was assessed in “Wilderness Need Evaluation for the Malheur, Umatilla, and Wallowa-Whitman National Forests” (USDA Forest Service 2010) and is included in the project record. The report findings, based on the above criterion, reveal that additional wilderness designation is not necessary within the Blue Mountain national forests.*

***Wallowa-Whitman National Forest  
Review of Areas with Wilderness Potential  
March 2010***

***Huckleberry Roadless Area (#6289)  
10,770 Acres***

***Capability***

***Naturalness and Undeveloped Character:*** *There are opportunities for solitude and for primitive and challenging recreation activities although not of the caliber that exists in the present wilderness. There are no known threatened or endangered species nor are there opportunities for historic or scientific study.*

*There are no known cultural resources of special significance.*

*There are opportunities for solitude and for primitive and challenging recreation activities although not of the caliber that exists in the present wilderness.*

***Primitive Recreational Opportunities and Challenges:*** *There are opportunities for solitude and for primitive and challenging recreation activities although not of the caliber that exists in the present wilderness.*

***Special features:*** *There are no ecosystems or features of interest found in the area that are not found more abundantly within the Eagle Cap Wilderness.*

***Manageability and boundaries:*** *Open roads have been removed from the area, and the area can be feasibly managed as a wilderness.*

***Timber/Vegetation:*** *Historically, periodic disturbance events functioned to maintain horizontally diverse stand structures within the cool/dry biophysical environment dominating the Huckleberry Roadless Area. However, the existing horizontal distribution of age/size classes and species diversity does not reflect historic patterns. Natural disturbance events operating within the environment were cyclic, variable in intensity, and gave rise to a mosaic pattern of stand structures. As a result, age and size classes and species diversity were high given the varied disturbance regimes. Fire was a relatively frequent visitor to a large extent of this environment as evidenced by residual overstory ponderosa pine, western larch, and Douglas-fir. Frequent low-intensity surface fires favored canopy dominance by these species. The probability of a stand-replacing fire event within areas dominated by fire resistant species was low because of the light fuel loadings and lack of vertical fuel. Common cyclic events such as group bark beetle mortality, localized wind-throw, and enlarged root rot centers provided sufficient fuel to sustain discrete crown fire events. Locations of such past episodes are evidenced by even-aged groups of mixed conifers included within the multi-layered matrix.*

*In contrast, the existing homogenous vertically layered late seral structures are very susceptible and vulnerable to sustained, widespread damage due to insects, pathogens, and catastrophic fire.*

***Insects and Disease:** Over the past two decades, many conifer trees within the area have been killed by insect and disease outbreaks. The spruce budworm, Douglas-fir tussock moth, scolytus fir engraver beetle, and the Douglas-fir bark beetle continue to cause severe losses.*

**Comment:** The area has had timber harvest activity 30 years ago and the roads were closed following those entries but are still visible on the landscape. As shown by the 2010 Review and stated above this is not a unique or special area that would provide wilderness benefits. Remove this area from its potential wilderness classification and put it back into general forest status for active management.

Page 204 – Volume 1

***Wallowa-Whitman National Forest***

*The majority of potential wilderness areas identified in the Wallowa-Whitman National Forest would be allocated to MA 3A – Backcountry (nonmotorized use) (81,200 acres) and to MA 3B – Backcountry (limited motor vehicle use) (119,500). These management area designations are characterized by primitive qualities and provide opportunities to protect the five qualities of wilderness character.*

**Comment:** Where is the backcountry? We need a detailed map of the backcountry both 3A and 3B. In no way should we be adding these designations of backcountry, which is defacto wilderness, to the existing acres of wilderness in Wallowa County. We already have more Wilderness than most other states. We need land that can be managed. Wilderness is a detriment to the acres and the surrounding acres in being able to manage fire and noxious weeds.

Page 206 – Volume 1 (End of Page)

*Additional qualities including ecological, geological, or other features of scientific, educational, scenic, or historical value would be conserved. Enhancing these qualities would have a beneficial effect on wilderness characteristics and values.*

**Comment:** This is the Standley Basin area, we assume, that is the proposed Wilderness area. This is an area that has been of special interest to a few people that fought hard in TMP to keep those roads/trails available for motorized use. Wallowa County has enough wildernesses. It is also historical grazing lands. The historical grazing of this area should be kept out of the wilderness and made available as an example of sheep grazing in this setting with public access and being to tell the story.

Page 211 - Volume 3, Appendix A

***Table A-27. Miles of eligible wild and scenic rivers for each national forest\*  
Wallowa-Whitman National Forest***

*Wild                      Scenic                      Recreational*

<i>Big Sheep Cr</i>	<i>10</i>		<i>39.1</i>	<i>Recreation, fisheries, cultural</i>
<i>Dutch Flat Creek/Van Patton Creek*</i>	<i>5.3</i>	<i>0</i>	<i>0</i>	<i>Scenery, recreation, geological, hydrological, botanical</i>
<i>East Eagle Creek*</i>	<i>9</i>	<i>2.1</i>	<i>4.5</i>	<i>Scenery, recreation, fisheries, hydrological, geological, cultural</i>
<i>Five Points Creek*</i>	<i>0</i>	<i>12.1</i>	<i>0</i>	<i>Scenery, fisheries, wildlife</i>
<i>Killamacue/Rock Creek</i>	<i>10.2</i>	<i>8.6</i>	<i>0</i>	<i>Scenery, recreation, geologic, botanical</i>
<i>North Fork Catherine Creek</i>	<i>11.1</i>	<i>0</i>	<i>2.6</i>	<i>Scenery, recreation, fisheries, wildlife</i>
<i>Swamp Creek</i>	<i>7.6</i>	<i>0</i>	<i>9.2</i>	<i>Fisheries, wildlife, cultural</i>
<i>Upper Grande Ronde River</i>	<i>11.7</i>	<i>0</i>	<i>18</i>	<i>Recreation, fisheries, wildlife, cultural</i>
<b><i>Totals</i></b>	<b><i>64.9</i></b>	<b><i>22.8</i></b>	<b><i>73.4</i></b>	

**Comment:** Neither Big Sheep Creek or Swamp Creek are accessible. There are private land issues. Neither of these sites offers any unique opportunities that are not available elsewhere in the forest. USFS cannot manage those they have, they should not add more.

Page 213 - Volume 3, Appendix A

**Table A-29. Acres, status and change to research natural areas for each national forest with each alternative**

<b>Wallowa-Whitman National Forest*</b>				
<i>Clear Creek Ridge</i>	<i>0</i>	<i>63</i>	<i>Proposed</i>	<i>Ne</i>
<i>Craig Mountain Lake</i>	<i>172</i>	<i>17</i>	<i>Proposed</i>	<i>N</i>
<i>Glacier Lake</i>	<i>102</i>	<i>10</i>	<i>Proposed</i>	<i>N</i>
<i>Haystack Rock</i>	<i>425</i>	<i>42</i>	<i>Proposed</i>	<i>N</i>
<i>Horse Pasture Ridge</i>	<i>338</i>	<i>33</i>	<i>Proposed</i>	<i>N</i>
<i>Indian Creek</i>	<i>1,00</i>	<i>1,003</i>	<i>Established</i>	<i>N</i>
<i>Johnson (formerly Cougar Meadow)</i>	<i>131</i>	<i>13 1</i>	<i>Proposed</i>	<i>Name change</i>
<i>Lake Fork<sup>1</sup></i>	<i>224</i>	<i>22 4</i>	<i>Proposed</i>	<i>Boundary update</i>
<i>Mount Joseph</i>	<i>705</i>	<i>70</i>	<i>Proposed</i>	<i>N</i>
<i>Nebo<sup>1</sup></i>	<i>0</i>	<i>1,695</i>	<i>Proposed</i>	<i>Ne</i>

<i>Point Prominence</i>	365	36	<i>Proposed</i>	<i>N</i>
<i>Standley</i>	0	74	<i>Proposed</i>	<i>Ne</i>
<i>Gerald S. Strickler (formerly Government Meadow)</i>	195	19 5	<i>Established</i>	<i>Name change</i>
<i>Sturgill</i>	0	13	<i>Proposed</i>	<i>Ne</i>
<i>Tenderfoot Basin</i>	0	89	<i>Proposed</i>	<i>Ne</i>
<i>Vance Knoll</i>	190	19	<i>Established</i>	<i>N</i>
<i>West Razz Lake</i>	47	47	<i>Proposed</i>	<i>N</i>

**Comment:** This doesn't establish these, just leave them as proposed. If so, same input as before. We need to change the boundaries of these to make them acceptable.

Page 282 - Volume 3, Appendix A

**MA 1A Congressionally Designated Wilderness Areas within the Wallowa-Whitman National Forest**

*MA 1A*

*WAW-WIL-1 S-20*

*Standard*

*Eagle Cap Wilderness Area visitors shall not be authorized unless they unless they obtain and possess an entry permit.*

**Comment:** This is just wrong! Many of us go in and out of the wilderness areas from non-trailhead sites, this standard makes us illegal. This is just spending money to spend money and will not be near worth the cost.

Page 287 - Volume 3, Appendix A

**MA 2A WSR-8 G-78**

*Guideline The construction of roads and river crossings that are visible from the river corridor of wild and scenic sections should not be authorized or allowed except when necessary to meet recreation purposes.*

**Comment:** As stated this could affect a road miles from the river. This needs limited to roads within the corridor.

Page 408 - Volume 3, Appendix E

**Big Sheep Creek**

*From the headwaters (and including) the North Fork, Middle Fork and South Fork to the Imnaha WSR boundary.*

*Wild – 9.5 Recreation – 38.5*

*RECREATION - The quality, variety, and year-round recreation opportunities available along middle and upper Big Sheep Creek make it a popular area with local and regional visitors. The stream corridor is an excellent area for viewing wildlife. Conditions of the river-related setting make recreation an outstandingly remarkable value upstream from Carrol Creek.*

*FISHERIES – Populations of Chinook salmon; steelhead; native rainbow trout; and established bull trout are present. Big Sheep Creek supports populations of fish species that are regionally and nationally important, and has a great potential for high- quality fisheries habitat for*

*indigenous stocks. The populations along with the habitat comprise an outstandingly remarkable value fisheries value.*

*CULTURAL/PREHISTORIC – There are known sites that are either named to the National Register of Historic Places or are eligible and the stream corridor contains a unique concentration of prehistoric sites. The presence of old structures and historical human interest make the historic resource an outstandingly remarkable value.*

**Comment:** Recreation section: Access is nearly 0 except for the Loop road open for the summer months only.

**Comment:** CULTURAL/PREHISTORIC: A stretch at best.

*Page 415 - Volume 3, Appendix E*

### **Swamp Creek**

*From the National Forest boundary to the WSR boundary.*

*Wild – 8.5*

*Recreation – 9.5*

*FISHERIES - In addition, Swamp Creek supports a wild summer steelhead population that is regionally important, and has potential for high-quality fisheries habitat for indigenous stocks including native rainbow trout populations. The populations along with the habitat comprise an outstandingly remarkable value for fisheries*

*WILDLIFE - The inaccessibility, diversity, and significance of the wildlife populations in Swamp Creek along with the presence of bald eagles and the large stretch of riparian habitat make the area important. The quality, variety, and importance of existing wildlife habitat, comprise outstandingly remarkable value for wildlife.*

*CULTURAL/HISTORIC - The Swamp Creek stream corridor plays a vital role in Nez Perce tribal history. Most important is the proximity to the gathering place for Chief Joseph and his band at the confluence of the Grande Ronde River and Joseph Creek. In addition, the old homesteads and evidence of railroad logging add to the interpretive potential of the area. Important cultural resources along with the presence of old historical human interest make the cultural and historic resource an outstandingly remarkable value.*

**Comment:** There was no railroad logging in Swamp Creek. Swamp Creek has the same wildlife diversity as the rest of Wallowa County. The bald eagle population is no more than anyplace else in this area. This is not unique and outstanding compared too much of Wallowa County. The cultural/historical value is overstated. The confluence of the Grande Ronde and Joseph Creek is miles downriver and in a completely different setting. This is a real stretch to even consider this stream.

## **Wildfire**

*Page 119 – Draft Land Management Plan*

### **Post-fire Habitat**

*(standards and guidelines apply to all three national forests)*

#### **WLD-HAB-19 Guideline**

*G-4*

*Greater than 50 percent of post-fire source habitat should be retained and should not be salvage logged, except in the wild land urban interface.*

#### **WLD-HAD-20 Standard**

*G-5*

*Changed to Salvage logging shall not occur within burned source habitat areas less than 100 acres,*

*Standard*        *except for the removal of danger/hazard trees*

**WLD-HAB-23**   **Guideline**  
G-6

*Where salvage logging occurs, all snags 21 inches d.b.h. and greater and 50 percent on the snags from 12 to 21 inches d.b.h. should be retained except for the removal of danger/hazard trees. Snags should be retained in patches.*

**Comment:** To avoid major insect build-up on fire stressed trees and the resulting increase in mortality in green timber stands, aggressive salvage is needed. Modify these guidelines to allow 100% salvage logging after all fires.

*Page 121 - Draft Plan*

**FIRE-3** G-28

**Guideline**

*Mechanical fireline should not be constructed in areas with greater than 35 percent slope or on highly erodible soils unless potential adverse effects can be mitigated*

**Comment:** Where is the balance? If the cat can stop the fire it reduces the damage and what cat fire line cannot be mitigated? These types of actions need to be looked at on a risk assessment instead of the “ESA trumps all” look. This is perpetuating the zero risk management that needs to change in the USFS.

*Page 139 – Draft Plan*

**MA 4B RMA-FIRE-2** G-105

**Guideline**

*Chemicals and retardant should not be used for suppression and mop-up within riparian area*

**Comment:** This is so short sighted. Let it burn to a crisp but by god we didn't kill any fish with retardant. Maybe it's because the fish were going to be eaten by the administrators after they were cooked to death, because we didn't take the necessary steps to stop the fire.

*Page 179 – Volume 1 (End of Paragraph 3)*

*The majority of fuels treatments within harvest units would be accomplished by removal or crushing instead of burning. The lack of fire under alternative D could inhibit other ecological processes such as nutrient cycling, resulting in decreased understory productivity, diversity, and seedling establishment.*

**Comment:** Fire is debatable in many instances; however, the practicality of burning vast acres has not shown to work yet. The number of days per year that balances effective burn conditions with potential risk of it turning into a wildfire. These days, as in many years, there are very few and in most years, less than 10. Therefore prescribed fire at the level you propose is not feasible. This will mean that much of the forest you plan to fix with prescribed fire will not be touched.

*Page 219 – Volume 1 (Paragraph 3)*

*Fire has a fertilizer effect on the soil by increasing ammonium levels and microbial nitrogen mineralization, resulting in increased nutrient levels in both understory and overstory vegetation. Fire rejuvenates desirable grasses, depending on the species response*

**Comment:** Only if it is low intensity fires in areas that we do not have invasive annual grasses. If annual grasses are present using fire is very dangerous toward increased invasive plants. This statement needs changed to include the qualification where much of the three national forests area is in such a state that fire would not be wise. When forests were in their native states wildfire had a vastly different impact on the range conditions. The Great Basin Wildlife Forum, a search for solutions (2008), a forum that gathered 17 prominent scientists with over 500 years of combined work experience in the Great basin participated.

Dr. Paul Tueller is professor of range ecology emeritus at the University of Nevada, Reno stated “There are five important areas for consideration in addressing wildfire issues.” Those pertinent here are: “A second important consideration is the need to use grazing management to help solve the fire problem. The extreme fire years in the recent past must be due, in part, to the noted reduction in grazing the forage base, resulting in significant fuel buildup.” A third area is seeding with species that are known to be effective. It is important to highlight the scientific evidence that the most adapted and useful species have heretofore been non-native species. The argument about native versus non-native species is not useful and must be resolved based on available scientific findings. There is no good reason why the best and most useful species should not be used independent of origin.

Dr. Kenneth Sanders has been a professor of rangeland ecology and management at the University of Idaho for 32 years stated in the same report: “The third biggest threat is the reduction in grazing on public rangelands. If the proposed sage grouse habitat management guideline that recommends leaving a grass stubble height of 18 centimeters is applied, it will not only result in an adverse economic impact on livestock producers, but it also will result in increased, higher intensity wildfire due to a larger fuel load. Any adverse economic impact on livestock operators will lead to private ground being sold to developers, resulting in less open space, increased recreational use on rangelands and the resulting negative impacts mentioned above.”

Other comments included: “The first priority in rangeland restoration following wildfire should be to stabilize the soil, which means seeding species with the best chance of establishment. The same applies in trying to convert cheatgrass-infested rangelands to perennial grasses. The native species, which are more difficult to establish, should be seeded only after the soil is stabilized and cheatgrass competition is reduced.”

And: “Millions of dollars of taxpayer money have been wasted on high priced native seed mixes with very little success.

Dr. J. Wayne Burkhardt is professor emeritus of range management from the University of Nevada, Reno stated “For the past 40 years, the management strategy, at least on public lands, has been to reduce or modify livestock grazing on these annual grasses, presumably to allow the re-establishment of native bunchgrasses. This has proven to be disastrous. Pre-adapted annual grasses can out-compete native bunchgrasses for early spring moisture on arid range sites. Reductions in grazing on these rangelands have not promoted the establishment of native flora, but rather have allowed flammable fuel build-up and increased fire frequency, intensity and spread. These unnatural fires remove the sagebrush overstory, prevent shrub re-establishment and create the conditions for the establishment of monotypic annual grasslands on what should be a shrub/grassland vegetation community.

*AND* “Public land grazers have an important role in protecting the resource by reducing fire danger, by managing fuels and improving the health and productivity of the range. Grazing should be firmly established as a necessary tool in reducing fire danger. The public needs to understand that fine fuel reduction and weed control are positive aspects of grazing and that properly managed grazing is good for the land.

**Table 115. Number of subwatersheds in improved condition class in 10 years for each alternative for each national forest**

<i>National Forest</i>	<i>Alternative A</i>	<i>Alternative B</i>	<i>Alternative C</i>	<i>Alternative D</i>	<i>Alternative E</i>	<i>Alternative F</i>
<i>MAL</i>	16	16	42	18	21	21
<i>UMA</i>	23	23	25	25	23	23
<i>WAW</i>	4	4	14	2	5	4

**Comment:** This needs changed. With the current fire conditions, if we don't address this, many more sub-watershed will be in horrible shape after catastrophic fire.

*High severity burns lead to higher rates of soil loss from erosion, greater duff reduction, loss in soil nutrients, and soil heating (McNabb and Swanson 1990 and Hungerford et al. 1991).*

*The trend and existing conditions of vegetation in the Blue Mountains is similar to those described by Quigley (1996) and Macdonald et al. (2005). Data show that the Blue Mountains are dominated by ecosystems that evolved with frequent, low and mixed severity fire. Approximately 88 percent of the Blue Mountains are classified as historical Fire Regime 1, 2, or 3, which are the short to mixed return interval systems. Much of this landscape is currently moderately to highly departed from historical/reference conditions for vegetation and fuel conditions. The total percent of fire regime condition class 2 and 3 (moderate to high departure) ranges from 28 percent in the moist upland forest potential vegetation group to 100 percent in the dry upland forest potential vegetation group. Most of the condition class 1 (low departure) occur in the cold or moist upland forest types. The dry upland forest potential vegetation group exhibits the greatest departure from historical/reference conditions. The departure is caused by an abundance of stands classified as mid seral (understory reinitiation and stem exclusion) closed canopy and a deficit of stands in the late seral (old forest) open condition.*

*Alternatives vary in the tradeoffs of fire risk to vegetation. Potential effects to wildlife habitat and species from fire management will vary by alternative theme and management area assignments. Alternative C would rely greatly on both natural and management ignited fires as the agent of change for achieving desired conditions. The likelihood of natural fires would be greatest for alternative C, whereas implementing alternative D would make little use of management ignited fires and, due to the amount of anticipated vegetation treatment, would have the lowest probability of natural fire occurring.*

**Comment:** The above three excerpts from the DEIS shows that without a more aggressive alternative than is presented in the DEIS that catastrophic wildfire will result in soil loss, change in soil chemical composition, vegetative habitat loss and possible mass failure (i.e. Tanner Gulch) into fish bearing streams.

PL-TES-8 *New*      **Guideline** Wildland fire (planned and unplanned) suppression lines should not be constructed within occupied habitat of threatened, endangered, and sensitive plant species

**Comment:** Exception: when human health and safety is at risk or the loss of private property or historically significant sites.

## Wildlife

### ELK

*Page 58- Draft Plan - Paragraph 8*

#### *2.5 Rocky Mountain Elk*

**Existing Condition:** *Elk and the management of elk habitat continue to be important issues within the planning area. The number of elk hunters is declining slightly and the number of bulls and antlerless elk harvested appears to be declining more sharply (ODFW 2003).*

**Comment:** Need to use more current information, 2003 information is 11 years old and mostly has changed. Antlerless elk harvest in Wallowa County has been increasing. Elk hunters are declining due to the vast increase in license and tag fees and the decreased chance of being able to hunt where you have traditionally hunted. Reduced access to the national forests due to road closures may increase the “quality of hunt” for some but it reduces the opportunity to hunt for many more.

Also, many of the elk herds are on private lands and this is a hindrance for hunters.

*Page 58/59- Draft Plan - Paragraph 9*

*Elk use of forage areas often depends on proximity to cover areas and the distance to roads and trails open to motor vehicles. Much of the open road density in the planning area outside of wilderness and roadless areas exceeds 2.4 miles per square mile. Many of the forage areas are associated with roads, and therefore the value of these areas to elk is minimized or totally lost. To provide for elk security during hunting season, there is a greater need for motor vehicle road and trail network closures on landscapes dominated by flat, open terrain. The need for vegetative cover is reduced in areas of steep, convex topography. This topography can limit human access during hunting season. Historically, elk summered in the higher elevations and moved to the adjacent valleys during the winter. A large portion of the historic elk winter habitat has been converted to agricultural lands, residential use, or rural residences. As a result, elk no longer*

*have access to their traditional winter ranges in the Blue Mountains. Damage to crops and pastures on private land by wintering elk has increased markedly during the past 40 years. This has led to the development of several elk winter feeding areas.*

Page 59 –Draft Plan-Paragraph 3

*Maintaining a mosaic of elk forage and cover areas for a given season and landscape varies based on the biophysical potential of each landscape to sustain cover areas and based on the capability to maintain or enhance adequate forage areas that provide higher nutritional resources far from motor vehicle access. In areas where elk have the potential to damage adjacent private lands or there is a need to meet other goals of management across mixed land ownerships, the quantity of forage and cover areas may be reduced, such as in the wildland urban interface (WUI) where the goal may be to reduce the risk of wildfire, in these locations, forage and cover may not be optimal for elk.*

**Comment:** Again, site specific makes this statement wrong most of the time. Too much is put on roads and elk and how they cause so much damage to elk dispersal. The effect of roads on elks is mitigated by season, line of site, terrain and many other factors. Additionally newer and better research shows that summer nutrition has more to do with elk than cover or roads. There are a lot of value judgments or personal opinions in this statement it needs removed and/or written. Just because the forage area is near a road (many is an overstatement here) the value is not reduced or “totally lost” elk are seen regularly near Hwy 82 in the Wallowa Valley, they are seen regularly in the Zumwalt Prairie near roads. Elk do eat at night also. This is seen on private lands next to roads. They are adaptable and they won’t starve. These false statements need removed from the document.

**Comment:** If elk are causing so much damage in agricultural fields, and they are eating our haystacks, our pastures and tearing up our fences, why do you keep focusing on areas with good cover and no roads which are abundant in and around agriculture fields. They go there because of what’s growing to eat, regardless of cover and roads use.

Page 59 –Draft Plan- Paragraph 2

***Desired Condition:** In landscapes where elk use is promoted, as identified in coordination with state wildlife agencies, there is a mosaic of forage and cover areas, with minimal or no motor vehicle access through forage areas. There is an emphasis on maintaining existing cover areas in most winter range, which often compose smaller portions of the landscape, motor vehicle access and uses on winter range is minimized or eliminated during winter. Maintaining adequate forage areas close to cover and far from roads and trails open to motor vehicle uses is emphasized for most spring, summer, and fall range. For landscapes where hunting occurs, motor vehicle access is restricted so that elk can effectively use cover and topography as security. During hunting seasons, emphasis is placed on closing roads and trails to motor vehicles within landscapes that are flat and open; however, less emphasis is placed on closing roads and trails to motor vehicles within landscapes that are steep and have more cover, as identified in coordination with state wildlife agencies.*

**Comment:** With all the roads on the landscape over the past 35 years the elk population has exploded to the point that we are holding landowner meetings to deal with all the elk on their private property. It's nutrition much more than access or cover. If it were cover why is it so hard to move the elk off the Zumwalt Prairie?

*Climate change effects are discussed in detail in the individual resource sections in this chapter. Relative comparisons of the degree of climate change adaptation between alternatives are based on evaluation of one or more of the following indicators:*

- *Acres available for planting (even-aged harvest) and providing opportunities to adapt tree species composition to changing climates*
- *Acres of designated wildlife corridors, which can reduce barriers to movement*

**Comment:** Corridors are not the only way connectivity happens. This is narrow minded and short sighted.

*MA 3C Wildlife Corridor*

**Description:** *Wildlife corridors are areas designed to maintain habitat linkages between wilderness areas. Although disagreement exists regarding the utility of corridors, this management area emphasizes management for landscape connectivity, which is “the degree to which the landscape facilitates or impedes movement among resource patches,” (Taylor et al. 1993) or “the functional relationship among habitat patches, owing to the spatial contagion of habitat and the movement responses of organisms to landscape structure,” (With et al. 1997). A wide variety of vegetation structure and composition is present, with some showing evidence of past human disturbance and others showing affects primarily from natural disturbances, such as wildfires. Both summer and winter motor vehicle travel is restricted to designated routes. Recreation users can expect to find evidence of human activity in the form of vegetation management, mining, and road building. However, many of the roads that are closed to motor vehicle travel occur in these areas.*

**Desired Condition:** *Wildlife species using these areas experience minimal human disturbance. Thinning forested vegetation results in variable densities, with greater than 40 percent canopy cover, over greater than 75 percent of the area, during the life of the plan.*

**Comment:** These corridors do not need to be so restrictive. They are threaded all over the forest and elevating them to such special status causes too much emphasis to be put on one use. Remember, we are still a multiple use forest system. These conditions are very restrictive and do not need to be in a given place on the landscape. These corridor needs can be met on a rotating basis as we move vegetation entries around.

**Table 324. Management indicator species selected for each national forest by alternative**  
*Rocky Mountain elk were selected to be an indicator species on the Umatilla and the Wallowa Whitman*

**Comment:** In the northern section of the WWNF the rocky Mountain Elk is over populated (nearly double MO in many units) yet we worry about the elk as if it is something that could go away if we don't "save" it. Elk should not be an indicator species on these forests.

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*Thomas et al. (1979) indicated that optimum habitat for elk requires cover, which was defined as two types: thermal and hiding. Thomas et al. (1988) defined cover as either satisfactory or marginal and stated that if a stand was neither satisfactory nor marginal cover then it was a forage stand.*

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*Damiran (2006) indicated that moderate grazing by livestock and elk has little effect on the subsequent nutrient intake rate of cattle, deer, and elk in mixed-conifer rangelands during the late-summer in northeast Oregon. It is important to keep in mind that it is the plant community and the health of the plants themselves that must be the ultimate measure of use by herbivores (Vavra 1992).*

**Comment:** The new research report “Habitat-nutrition Relations of Elk During Spring through Autumn in the Blue Mountains of Eastern Oregon” by Rachel C. Cook, John G. Cook, Robert Riggs, Larry L. Irwin,(in process, under review) 2014 identifies summer nutrition as the most critical habitat need, not road issues.

Habitat of thermal and hiding cover is another management reach.

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*According to CFR 219.19(a)(6), “Populations trends of the management indicator species will be monitored and relationships to habitat determined. This monitoring will be done with State fish and wildlife agencies, to the extent practicable.” All three national forests rely on survey data collected by state fish and wildlife agencies [Oregon Department of Fish and Wildlife (ODFW) and the Washington Department of Fish and Wildlife (WDFW)] for population numbers and trend analysis of all game species. Additionally CFR 219.19(a)(1) states, “These species shall be selected because their population changes are believed to indicate the effects of management activities.*

**Comment:** Mostly hunting pressure and the over dense forest on federal lands that are forcing the elk onto private lands..... oh by the way they are open prairies and they don't care.

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*Intrusion from sources other than hunting is increasingly a problem for elk managers (ODFW 2003a). This is particularly true on multiple-use public lands where access by motor vehicle and nonmotorized traffic is largely unrestricted and increasing (ibid). Traditional elk habitat models recognized the impacts from access, and used road density in order to evaluate impacts of proposed land management actions. This approach was better suited to the 1980s when most proposed projects were timber sales and associated roads needed for implementation. Since the early 1990s, both road building and timber sales have decreased while recreational, nonmotorized and motor vehicle cross-country activities and facilities have dramatically increased. While road density is still important, the impact from recreational access that doesn't use designated roads or trails is emerging as a pressing issue. Many federally administered public lands are open to cross-country travel by any means unless specifically closed (i.e., wilderness, seasonal area closures, etc.).*

**Comment:** Seasonal road closures and the elimination of cross country travel to calving areas, winter range, and hunting areas will provide the security needed.

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**Table 335. Percent of Rocky Mountain elk population objective achieved by management zone, game management unit, and year for the last decade for units containing National Forest System lands in the Blue Mountains**

Totals Chesnimnus only showing 100 to 106%

**Comment:** These numbers are very, very wrong! Chesnimnus unit is showing 5500 elk with an MO of only 3,000.

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*It has also been suggested that early spring or late fall use by wild ungulates, such as elk or deer, are known to impact bunchgrass communities by heavy and improperly timed grazing such that the more palatable, and early growing (e.g., cool-season or C-3) species have been negatively impacted (Briske and Richards 1994).*

**Comment:** Therefore USFS should request the ODFW to bring their elk populations within MO's for those units that exceed them.

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**Table A-11. Terrestrial and aquatic focal and management indicator species for the action alternatives**

Human disturbance	Habitat generalist	Peregrine falcon	X	
		Wolverine	X	
		Rocky Mountain Elk		WAW/UMA only

**Comment:** Elk in Wallowa County are everywhere. They are in our hay fields, pastures and on the roads. I drove by an elk yesterday that I stopped and took a picture of. She was less than 100 ft. from the road. She put her head down and began grazing as I took a picture. Elk are adaptable. (John Williams)

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**2.5 Rocky Mountain Elk**

**Desired Condition:** *In landscapes where elk use is promoted, as identified in coordination with state wildlife agencies, there is a mosaic of forage and cover areas, with minimal or no motor vehicle access through forage areas. There is an emphasis on maintaining existing cover areas in most winter range, which often compose smaller portions of the landscape, motor vehicle access and uses on winter range is minimized or eliminated during winter. Maintaining adequate forage areas close to cover and far from roads and trails open to motor vehicle uses is emphasized for most spring, summer, and fall range.*

**Comment:** If roads and cover are such an issue, then why do we have 3,500 elk living year around on the Zumwalt prairie when all these great landscapes with hiding cover are in the lands next door on the National forests. The massive emphasis on roads and hiding cover are over stated and need to be deemphasized. Elk are at double MO's in much of our county at least it should state that if the elk population is over MO's then these restrictions should not be used.

## **Conclusion**

The Blue Mountains National Forests need to be restored at a more aggressive pace and scale than is presented in any of the fully developed alternatives. We feel that a plan to move forward in a more aggressive manner can and should be based on the Wallowa County Comprehensive Management Plan.