

Dear Blue Mountain Forest Plan Revision Team,

March 1, 2010

As organizations with a strong interest in the conservation of the Blue Mountains ecosystem, we write to you with serious concerns regarding the direction of the Blue Mountains plan revision has taken. A number of our organizations have directly or indirectly provided input and comments into the plan revision for the Wallowa Whitman, Umatilla and Malheur national forests. This letter is intended as a follow up to our recent meeting in Pendleton on January 14 and addresses some of our primary concerns.

We are very concerned with the draft plan and your decision to press forward with a flawed inventory for potential wilderness, recommended wilderness, and eligible wild and scenic rivers. At the recent meeting in Pendleton we collectively discussed further meetings to refine the various inventories and recommendations. Upon further discussions we believe that the minor refinements the USFS appears to be willing to entertain would not be adequate to address the enormous inventory and recommendation flaws. The inventories have not been completed objectively and need to be redone rather than moving forward. Below are some of our specific concerns.

Potential Wilderness

Conservation organizations presented to the revision team a detailed inventory of all potential wilderness areas in the Blue Mountains. The inventory criteria used was the same as the USFS handbook. The revision team decided, based on a heavily skewed interpretation of the criteria to disqualify 203 of the 205 areas (non-IRAs) that we had identified from inclusion in the inventory. Many of our inventoried areas were field-verified and developed using advanced GIS technology. While we may disagree on certain areas, the disqualification of virtually the entire inventory is unacceptable.

One of the primary flaws in the USFS inventory process is related to the definition of a road. Chapter 70 of the Forest Service handbook inventory criteria identifies roadless areas as areas of sufficient size that do not contain “forest roads . . . or other permanently authorized roads.” The definition of forest roads is: “A motor vehicle travelway over 50 inches wide, unless designated and managed as a trail. A road may be classified, unclassified, or temporary.” This definition is a dramatic departure from previous inventory criteria, which defined roadless areas as areas that “do not contain *improved roads maintained for travel by standard passenger vehicles.*” We believe this criteria best meets the intent of the Wilderness Act and should be retained.

Applying the Chapter 70 language will lead to the exclusion of areas that contain unmaintained routes, high-clearance routes, off-road vehicle routes, administrative routes, other vehicle ways, and vehicle routes that are managed as trails. While inclusion of these routes may not be appropriate in areas that the agency is recommending for wilderness, they do not, in and of themselves, exclude an area from consideration. Many roadless areas—and wilderness areas as well—contain such routes, and it is clear that Congress does not view areas that contain such routes as being de facto eliminated from wilderness consideration. We believe that the original inventory criteria should be retained, and the presence of unmaintained routes, high-clearance routes and the like should be addressed in the evaluation process, not the inventory process.

Not only has the Malheur national forest rejected our entire inventory outside of IRAs, it has gone a step further and dropped entire roadless areas, again based on a flawed criteria process. We strongly urge you to add the Flag Creek, North Fork Malheur, Silver Creek and Fox Creek areas back into the inventory.

We are also concerned that the USFS is misapplying wilderness evaluation and management criteria prematurely during the inventory stage. This shouldn't happen until the evaluation stage. There appear to be a number of areas/acres that have been eliminated or not inventoried because of management concerns in general if they were to be recommended as wilderness. These situations are the most prevalent in areas where setbacks or buffers from roads or previous disturbances have been employed or large contiguous areas have been eliminated from the roadless inventory because they were connected by an isthmus.

Applying this type of management criteria may be necessary in the evaluation and recommendation of areas for wilderness (Stage 2) but is wholly inappropriate at this initial inventory stage. In Chapter 70 (FSH 1909.12), the directives indicate that the inventory and wilderness evaluation parts of this process are indeed separate by listing the specific criteria for each in separate sections (i.e., 71.1 Inventory Criteria; 72 Evaluation of Potential Wilderness Areas). Applying the evaluation criteria during the inventory stage results in tens of thousands of acres consistent with the Forest Service's roadless criteria left uninventoried.

The Forest Service must view roadless areas not only as potential future wilderness but also as ecologically significant resources that have value wholly independent of their potential future value as wilderness. "[T]he Secretary of Agriculture shall develop and maintain on a continuing basis a comprehensive and appropriately detailed inventory of all National Forest System lands and renewable resources. This inventory shall be kept current so as to reflect changes in conditions and identify new and emerging resources and values." 16 U.S.C. 1603.

Recommended Wilderness

Of the 1.8 million acres conservationists identified as potential Wilderness, the USFS has found only 16,350 acres of recommended Wilderness. That means less than 1% of the potential wilderness areas are being recommended for Wilderness. There is no possible way to interpret this as an objective analysis.

For example, the Umatilla National Forest (UNF) has virtually no recommended wilderness and yet over 21% of the UNF is potential Wilderness. The UNF is surrounded by growing communities that are placing increasing demands on existing Wilderness Areas, as the visitor statistics support. Connectivity across the landscape is not being considered and critical species assemblages that need representation in the Wilderness System are being ignored. None of the seven designated wilderness areas in the Blue Mountains are immediately adjacent to one another, and some are separated by an interstate highway or valley. It is well known that species will greatly benefit from a more connected landscape in the face of climate change. Dry grand fir, dry ponderosa Pine, and moist forest are "under represented" in wilderness areas and 55,000 roadless acres of this type were identified. There are strong scientific reasons for evaluating these areas thoroughly.

Wild and Scenic Rivers

The Malheur National Forest hasn't found a river on the entire forest, over one million acres, that may have "outstandingly remarkable values" that would qualify to even be considered for potential Wild and Scenic. This is a blatantly extreme interpretation of the criteria of what qualifies as a wild and scenic river. As an example, many of our groups recommended the following rivers be inventoried as eligible Wild and Scenic Rivers on the Malheur National Forest. These are: Big Boulder, Big Creek (Blue Mtn. Road), Granite Boulder, Big Creek/Lake Creek, the Little Malheur River, Murderer's Creek, the Middle Fork John Day River, South Fork Long Creek, Silver Creek and Vinegar Creek. According to the U.S. Forest Service, zero of these rivers were found eligible. The Umatilla and Wallowa Whitman National Forest inventories are also severely lacking, but not to the extent of the Malheur.

In conclusion, we have previously engaged in what we thought was a collaborative effort to work together in development of the plan revision. Our inventories and suggestions have been largely ignored and not seriously addressed. With so many of our proposed Wilderness areas not being recommended for Wilderness and zero rivers being found eligible on the Malheur, the disparity is so large that minor efforts to simply mend the inventory of potential and recommended wilderness would be wholly inadequate. We ask that you reconsider your inventories and do them justice with a fair and objective analysis. We urge you to slow down your forest planning process and ensure your forests have a credible roadless area inventory before basing future planning decisions on inaccurate and/or incorrect information. We also urge you to revisit your evaluations of potential wilderness and what rivers qualify for Wild and Scenic River designation since there is such a dramatic difference in evaluations between the USFS and conservation groups. Let us make sure the stewardship of these forests is based on the best information available.

Sincerely,

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