Blue Mountains Forest Plan Revision

Scoping Comments

To: Blue Mountains National Forest Plan Revision Team
USDA Forest Service

From: Paul Hamilton-Pennell, Owner & Representative, Alembic Enterprises

Re: Scoping Comments on the Preliminary Draft Proposed Land Management Plans for the Malheur, Umatilla, and Wallowa-Whitman National Forests

Citations attached

Introduction

I submit these comments, on behalf of my organization, out of deep concern for the ecological integrity, climate resilience, and long-term sustainability of the Blue Mountains National Forests. The Forest Service's **Preliminary Draft Proposed Land Management Plans** and **Preliminary Need to Change** documents outline a vision that relies heavily on commercial logging, mechanical thinning, and "fuel treatments" under the rubric of active management. While the agency frames these measures as necessary for reducing wildfire risk, restoring ecosystems, and providing economic outputs, the scientific record and recent experience show that such approaches are ecologically harmful, climate-counterproductive, and socially shortsighted.

The revision process presents a rare opportunity to **strengthen—not weaken—forest protections**. To meet the requirements of the 2012 Planning Rule, the new forest plans must be guided by the best available science and must establish **enforceable standards, not discretionary guidelines**. Standards are critical to ensuring accountability and preventing the erosion of ecological integrity. Guidelines, by contrast, are too easily waived or reinterpreted in favor of short-term commercial objectives.

1. The Ecological and Legal Imperative for Strong Standards

The 2012 Planning Rule requires that revised forest plans maintain or restore **ecological integrity** across the plan area. Ecological integrity encompasses the composition, structure, and function of ecosystems within their natural range of variability. This requirement cannot be met if the revised plans authorize widespread commercial logging and thinning that degrade soils, remove large fire-resistant trees, fragment habitats, and disrupt natural disturbance regimes.

The **Preliminary Need to Change** document itself acknowledges that the 1990 plans were based on outdated science and failed to account for ecological stressors such as drought, insect outbreaks, and wildfire. Yet the draft proposed plans respond to this reality not by committing to strict protections but by institutionalizing broad-scale logging programs under the guise of “fuel reduction” and “resilience.” This is inconsistent with both the letter and spirit of the Planning Rule.

2. The False Promise of Logging as Fire Management

The Forest Service proposes extensive “fuel mitigation treatments”—20,000 to 30,000 acres annually per forest—to reduce wildfire risk. However, the scientific consensus is clear: logging-centered fire management is ineffective and often counterproductive.

DellaSala et al. (2022) demonstrate that the **MegaFire Active Management Approach**—which includes logging large trees, cutting snags, building roads, and conducting landscape-scale thinning—has failed to curb wildfire trends and instead contributes to biodiversity loss, carbon emissions, and long-term ecological degradation. Very few treatments ever intersect with a wildfire under burn conditions when they might influence fire behavior, meaning the vast majority of logged acres endure ecological harm without any fire-safety benefit.

Moreover, recent evidence shows that **heavily logged areas often burn more severely than protected areas**, undermining the central rationale for logging-based fuel treatments. In contrast, intact old forests, with their cooler microclimates and complex structure, frequently serve as **fire refugia**, buffering landscapes against extreme fire effects.

The new forest plans must recognize that fire is an **ecological process, not simply a threat**. Mixed-severity fire regimes are natural and necessary for long-term resilience. Efforts to homogenize forests through logging reduce pyrodiversity, erode habitat complexity, and diminish resilience to climate-driven stressors.

3. Protecting Large and Old Trees

One of the most troubling aspects of the draft plans is the erosion of protections for large and old trees. The **Eastside Screens**, adopted in the 1990s, prohibited the harvest of live trees greater than 21 inches in diameter—a critical safeguard for carbon storage, wildlife habitat, and long-term ecosystem stability. The **Preliminary Need to Change** document now frames these protections as outdated and suggests they will be “updated” with new science.

In fact, the best available science confirms that **large trees are irreplaceable ecological assets**. They store up to half of aboveground forest carbon, serve as keystone habitat structures, and regulate watershed hydrology. Once lost, they take centuries to recover, far beyond the time horizons of climate and biodiversity crises.

The final plans must **reaffirm and strengthen large tree protections**. Standards should explicitly prohibit the logging of old and mature forests and large-diameter trees, except for narrowly defined safety reasons near infrastructure. Guidelines allowing “flexibility” are insufficient and will invite abuse.

4. Soil Ecology, Watersheds, and Flood Risk

The draft plans set a disturbing threshold of up to **20% detrimental soil condition** before restoration is required. This tolerance level risks chronic degradation of soil structure, nutrient cycling, and mycorrhizal networks that underpin forest regeneration. Industrial logging, yarding, and road-building compact soils, increase erosion, and exacerbate downstream flood risks.

Healthy soils are the foundation of resilient forests. They regulate water infiltration, aquifer recharge, and stream stability. Allowing one-fifth of a project area to be degraded before intervention is ecologically indefensible. The revised plans must adopt **zero-tolerance standards for soil degradation** and require restoration before conditions approach detrimental thresholds.

This is especially critical given the flood history of the Blue Mountains region. Logging-induced sedimentation and altered hydrology compound risks to downstream communities, municipal water supplies, and aquatic ecosystems.

5. Aquatic Protections and ARCS Weaknesses

The new **Aquatic and Riparian Conservation Strategy (ARCS)** replaces the stronger standards of PACFISH and INFISH. While ARCS promotes “integration,” it lacks the binding clarity of the older standards. By relying on guidelines rather than enforceable standards, ARCS risks opening riparian zones to discretionary management that could degrade streams and fisheries.

Given the global biodiversity crisis and the importance of cold-water refugia for salmonids, the revised plans must adopt **mandatory no-logging buffers on all streams, wetlands, and riparian corridors**. These standards must be enforceable, measurable, and not subject to case-by-case waivers.

6. Forest Degradation and Global Obligations

As DellaSala et al. (2025) argue, **forest degradation—through commercial logging, road-building, and structural simplification—is a major source of carbon emissions and biodiversity loss**, often underappreciated in domestic policy. The United States has pledged under the **Kunming-Montreal Global Biodiversity Framework** and the **Paris Agreement** to halt and reverse degradation by 2030. Weakening protections for old forests and promoting large-scale logging in the Blue Mountains moves us in the opposite direction.

The revised plans should align with these international obligations by:

- Protecting all remaining primary, old, and mature forests.
- Ending large-scale industrial logging on public lands.
- Committing to **proforestation**—the practice of letting existing forests grow to their full ecological potential as a low-cost, high-impact climate and biodiversity solution.

7. Ecosystem Services: Water and Climate Resilience

The Blue Mountains forests provide indispensable ecosystem services: carbon sequestration, watershed regulation, biodiversity refugia, and climate buffering. These services far outweigh the short-term economic value of timber extraction.

Old and mature forests **cool local microclimates**, regulate stream flows, and provide critical drought resilience. Intact forests store carbon for centuries, whereas logging releases carbon immediately while diminishing future sequestration capacity. By prioritizing commercial logging, the draft plans sacrifice these essential public goods in favor of narrow economic interests.

The revised plans must explicitly recognize ecosystem services as primary management outcomes, supported by enforceable standards that protect carbon-rich, water-regulating, and biodiversity-supporting landscapes.

8. Cumulative Impacts and Long-Term Stability

The draft plans adopt a project-by-project framing of management impacts, ignoring cumulative effects across landscapes and decades. Industrial-scale logging, combined with road networks, fuel treatments, grazing, and climate stressors, produces **synergistic degradation** that is far greater than the sum of individual actions.

DellaSala et al. (2025) provide a framework of ecological integrity indicators—large trees, soil health, hydrology, connectivity—that should be incorporated into the monitoring and accountability provisions of the forest plans. Standards must require cumulative impact analysis and mandate corrective action when ecological thresholds are approached.

Conclusion and Requests

For the Blue Mountains forest plan revisions to succeed, the Forest Service must abandon its reliance on discretionary guidelines and adopt **clear, enforceable standards** that:

1. **Prohibit logging of old and mature forests and large trees**, except for narrowly defined safety reasons.

2. **Establish mandatory soil protection standards** that prevent detrimental conditions before they occur.

3. **Strengthen aquatic protections** with no-logging riparian buffers and enforceable safeguards for cold-water species.

4. **Limit road-building and decommission unnecessary roads** to restore watershed function.

5. **Prioritize proforestation and passive restoration** as primary management strategies, consistent with global biodiversity and climate goals.

6. **Fully evaluate cumulative impacts** and require corrective actions when ecological thresholds are exceeded.

The Blue Mountains forests are invaluable reservoirs of biodiversity, carbon, and water. Weakening protections in the name of “flexibility” or “resilience” will only accelerate degradation and undermine the very values the Forest Service is charged with protecting. Now is the moment to adopt bold, science-based standards that secure the future of these forests for generations to come.

Respectfully submitted,
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