



Kettle Range

CONSERVATION GROUP

Protecting the forests and wildlife of the Columbia Highlands since 1976

August 11, 2026

Blue Mountain National Forests
Forest Plan Leadership Team

Submitted electronically <https://cara.fs2c.usda.gov/Public/CommentInput?Project=301397>

To Whom it May Concern:

On behalf of the members and Board of Directors of Kettle Range Conservation Group (KRCG), I submit the following comments, questions and concerns regarding the Blue Mountains Forest Plan DEIS. Formed in 1976, our mission to protect wilderness, protect biodiversity and restore ecosystems of the Columbia Highlands. The Forest Service's (FS) proposed Forest Plan (LRMP) revision will impact our members, the environment and therefore KRCG opposes FS preferred Alternative 2.

Old Growth Forest Protection

KRCG urges the FS to retain existing large tree / LOS protections to provide critical habitat for a variety of species. Please retain enforceable standards and guidelines to provide clear direction to maintain all trees over 21 inches DBH to decision makers now and for decades to come. Alternative 2 is merely a sieve providing maximum flexibility to log trees the FS deems "the wrong mix, inappropriate or a risk to other tree species." Given the FS penchant for assigning authority to the timber industry "designation by description (DxP) further underscores why clear and enforceable standards are necessary. Tree size matters to pileated woodpecker, goshawk, Vauxs swifts, American marten and many other species. Large trees harbor seed genetic traits proven by the test of time to survive through changes in weather, high winds, insects & disease, wildfire, etc. Large trees represent just 3% of Blue Mountain Forest but store 42% of its aboveground carbon.

Forest and Riparian Spatial and Temporal Linkages

Water is perhaps the most valuable natural resource provided by the Blue Mountain Forest. Surface and ground water that flow out of the Wallowa-Whitman, Umatilla, and Malheur don't just support salmon and steelhead; they supply drinking water to cities like Walla Walla, Baker City, and La Grande.

Plan revision should apply decadal spatial habitat linkages, broadly, that incorporate the needs of wide ranging species, salmonids and TES species. Following on NW Forest Plan, INFISH/PACFISH and existing LRMP, there is a need to maintain and/or establish specific

management areas for habitat connectivity and include standards for connectivity across all relevant plan areas.

The agency must maintain riparian protections quantitatively outlined in PACFISH and INFISH standards. Salmonids and associated aquatic species continue precipitous population declines. Alternative 2 uses vague language such as "when feasible" that history has shown is subordinate to mandatory standards for aquatic and riparian habitats to protect the systems that support over 80% of forest wildlife.

Elk / Wildlife

Reinstate open road density standards for elk that in turn provide habitat for sensitive species. Starkey research has clearly demonstrated the impacts of roads, off-road vehicle and mountain biking. I oppose the shift to a nutrition-based approach that lacks any enforceable limits on motorized access in sensitive habitats that has been shown to stress elk. You must restore quantitative road density standards (such as 1.5 miles per square mile) to provide the habitat security necessary to keep elk and deer on our public lands.

Roadless Areas

Roadless Area protection is as important now as it has ever been. forest-level protection for all roadless areas and a harder look at potential Wilderness quality lands. Please create a management area similar to 2A – Roadless Area in Alternative 3 that will provide permanent safeguards for our 722,000 acres of roadless lands. These plan components should mirror the 2001 Roadless Rule to ensure these landscapes are protected from logging and roadbuilding even if national regulations are rescinded.

Research suggest that building roads into roadless areas is likely to result in more fires. Both roads and roadless areas can contribute to strategic, landscape-scale fire management. (Aplet, et al, 2026)¹

Results From 1992 to 2024, in all 8 contiguous-US Forest Service regions combined, wildfire-ignition density was lowest in designated wilderness areas (1.75 fires/1000 hectares), followed closely by Inventoried Roadless Areas (1.97 fires/1000 ha). The highest wildfire-ignition density was in lands within 50 m of roads (7.99 fires/1000 ha), and the second highest wildfire-ignition density was in other national forest lands outside of the 50-m road buffers but not in wilderness or roadless areas (3.50 fires/1000 ha). (Ibid @ 1)

Conclusion

¹ Aplet et al. *Fire Ecology* (2026) 22:8 <https://doi.org/10.1186/s42408-026-00450-2>

The DSEIS, Alternative 2 and its supporting documents should be entirely revised. However, the potential risks of significant environmental impacts from the proposed action urge selection of a No Action alternative for this proposal.

Sincerely,

A handwritten signature in black ink, consisting of a large, stylized 'C' followed by a horizontal line extending to the right.

Timothy Coleman
Executive Director