

September 2, 2026

Umatilla National Forest
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Pendleton, OR 97801

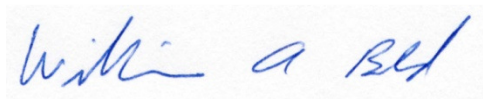
Subject: Comments on Blue Mountain Forest Plan Revisions, #301397

In the purpose and need section, page 2, you state that alternative 2 will employ "active management" to reduce fire risk (increase landscape resilience). What science is there to support the assertion that "active management" actually accomplishes what it is supposed to? The 2026 fire in the Mount Hood Forest referred to as the grasshopper fire burned an area that had undergone "treatment" (active management) in 2025. It does not look to me that "active management" is a silver bullet to our wildfire problem. Since that is the main reason used as justification for modifying the 1990 management plan, more effort should be expended in this DEIS to explain how active management employs the best available science and how the Forest Service is sure that this technique actually does the job it is supposed to. Section 219.3 of subpart A of the 2012 planning rule states that a discussion of the best available scientific information should be included in this document or at least made available. Is that information available? I did not see it in the DEIS.

Old growth is mentioned in several places of the DEIS except in Appendix B where the alternatives are discussed. Old growth is not mentioned in Tables 21 through 24 where the acreage for other designations are listed. There is old growth shown in figure 4, a map for alternative 1 for the Malheur management area but none appear in Figures 5 and 6 which show maps for alternatives 2 and 3. Ditto for the data presented for the Umatilla and Wallowa-Whitman management areas. Page 95 of the DEIS states "All three Land Management Plans designate management areas for old growth". How many acres of old growth forest are there in these 3 management areas? How many are preserved in alternatives 2 and 3? Given that old growth forests have a reduced fire risk compared to other types wouldn't retaining old growth be of particular importance to any plan to reduce fire risk? Why eliminate the old growth designation in alternatives 2 and 3 if the reason for modifying the 1990 management plan is to reduce fire risk? Shouldn't they be at the top of the list and shouldn't active management produce more old growth?

Given the lack of scientific data that proves active management - whatever that is - will actually reduce fire risk; I am of the opinion that the Forest Service lacks a strong case that changing the 1990 management plan will result in healthier forests. Given the Trump administration's goal of producing more timber from federal lands this whole effort sounds like an attempt to increase logging in the name of wildfire reduction. I therefore ask that the Forest service chose alternative 1. Thank you for considering my comments.

Sincerely,



Portland, Oregon