

In Its Own Words

Why the Forest Service's own assessment, research, and past decisions support a strengthened Alternative 3 in the Blue Mountains Forest Plan Revision Draft EIS (Malheur, Umatilla, and Wallowa-Whitman National Forests). Comment period July 2 to September 30, 2026.

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Summary

- I support **Alternative 3**, strengthened by carrying forward the enforceable standards of the 1990 plans (Alternative 1): the 21-inch large-tree limit, open road density limits, and streamside buffers written as binding standards.
- Alternative 2, the preferred alternative, repeatedly conflicts with the Forest Service's own findings. Its 2024 assessment documents a decline in old trees; its own Starkey research, conducted inside these forests, shows elk avoid open roads; its own climate assessment calls for protecting streamside shade and disconnecting roads from streams; and its own 2018 plan recommended about 70,500 acres of wilderness where Alternative 2 recommends none.
- Alternative 2 also depends on things the agency has said it cannot deliver: a timber volume more than three times current levels and a road system the Umatilla's own analysis shows is funded at a small fraction of need.
- The 2018 version of this plan was withdrawn after more than 300 objections. Alternative 2 repeats and deepens the problems objectors raised.

1. The alternatives at a glance

	Alt 1: No Action (1990 plans)	Alt 2: Proposed / preferred	Alt 3
Timber, first decade (MMBF/yr)	106	377	161
Jobs supported	n/a	about 3,050	about 1,415
Large trees	21-inch limit (standard)	No size or species limit	21-inch guideline; 30-inch for grand fir
Inventoried roadless areas (~722,000 ac)	Retained	Managed as general forest	Retained
Recommended wilderness	None new	None	About 34,000 acres
Wild and Scenic river miles	267	n/a	375
Road density standards	Retained	Removed	See Section 9

Sources: East Oregonian (June 10 and July 1, 2026) reporting on the Draft EIS; BlueRibbon Coalition and Greater Hells Canyon Council summaries of the Draft EIS. Figures should be confirmed against the Draft EIS itself.

2. The contradiction ledger

Each row pairs something the Forest Service itself has found, written, or decided with what Alternative 2 would do.

What the Forest Service found or decided	What Alternative 2 does
2024 draft assessment: trees 150+ years old "decreased by approximately eight percent between 2001 and 2017"; old single-story dry forest is "the most departed from historical conditions on all three Blue Mountains national forests."	Removes size and species limits on which trees can be cut.
2024 draft assessment: "Open road density... as a basic measure is a way to identify potential high disturbance areas for elk and other wildlife species."	Removes road density standards.
Starkey Experimental Forest (Forest Service research inside these forests): elk "selection ratios increased with increasing distance from open roads" (Rowland et al. 2000).	Opens about 722,000 roadless acres to general-forest management, including road construction.
Umatilla Travel Analysis Report (2015): more than \$6.6 million per year needed for road maintenance; average road funding about \$450,000 per year; \$65 million to bring roads to standard.	Adds road access while removing the limits that keep the road system in check.
Blue Mountains climate assessment (PNW-GTR-939): "Maintain or restore riparian vegetation"; "Disconnect roads from streams"; manage grazing "to restore ecological function of riparian vegetation."	Replaces current riparian protections with an "active management" emphasis.
2018 preferred alternative: recommended about 70,500 acres of wilderness. 2010 inventory: 76 areas, about 705,000 acres, of potential wilderness.	Recommends zero acres of wilderness.
Wallowa-Whitman sale history: no year above 53 million board feet since fiscal 1992.	Projects 125 million board feet per year on the Wallowa-Whitman alone, 377 across the three forests.
2019 withdrawal: Acting Deputy Chief French said the plans were "difficult to understand" and would cause "ongoing confusion"; objectors cited too few enforceable standards.	Removes more binding standards than the withdrawn 2018 plan.

3. Large and old trees

The 21-inch limit came from the "Eastside Screens," interim direction adopted in 1994 for national forests east of the Cascades. It has shaped management of these forests for about 30 years. The case for keeping it rests largely on the Forest Service's own data.

- **Old trees are still declining.** The agency's February 2024 draft assessment, *Wildlife Species and Habitats of Interest*, found trees 150 years and older decreased about 8 percent from 2001 to 2017, and that old single-story dry forest is the structural stage most departed from historical conditions on all three forests.

- **Large trees hold a disproportionate share of carbon.** Using 3,335 Forest Inventory and Analysis plots (2010 to 2018) on six eastside national forests including the Malheur, Umatilla, and Wallowa-Whitman, Mildrexler et al. (2020) found trees 21 inches and larger were 3 percent of 636,520 trees but stored 42 percent of aboveground carbon.
- **The last attempt to weaken the rule failed in court.** The Forest Service replaced the 21-inch standard with a guideline in January 2021. On August 31, 2023, Magistrate Judge Andrew Hallman (District of Oregon) found the amendment violated NEPA (no EIS), NFMA (no objection process), and the ESA (no consultation on listed fish), and recommended vacating it.
- **Guidelines are not guarantees.** Reviewing the 2025 preliminary draft plan, Oregon Wild reported that "all of the 'shalls' or 'must' language is gone" and that "there's no guarantees that the large old trees will be protected."

Request

- Retain the 21-inch limit as an enforceable standard in every action alternative, including Alternative 3. Any exception (for example, grand fir encroachment in dry forest) should be narrow, documented, and still bounded by a diameter or age ceiling.

4. Roads, elk, and a road system the agency cannot afford

The Starkey Experimental Forest and Range sits in the Blue Mountains of northeast Oregon. Much of what land managers nationwide know about elk and roads comes from Forest Service research done there, on the landscape this plan governs.

- **Elk avoid open roads.** Rowland et al. (2000, *Journal of Wildlife Management* 64:672-684) found female elk selection ratios "increased with increasing distance from open roads," most strongly in summer when traffic was higher, and concluded road management "should remain an important consideration for modeling and managing the elk resource."
- **Elk avoid motorized recreation most.** Controlled Starkey experiments found elk shifted away from trails during ATV riding, mountain biking, hiking, and horseback riding, with the strongest response to ATVs (Wisdom et al. 2018), and that elk travel time was highest and feeding time dropped during ATV exposure (Naylor et al. 2009).
- **Road closures work here.** In an April 2026 lawsuit over the Umatilla's Ellis project, conservation groups cited Starkey findings that "reducing road densities in the Blue Mountains of Eastern Oregon can be a very effective tool," and noted that the Oregon Department of Fish and Wildlife had objected to dropping the project's road closures.
- **The road system is already beyond the budget.** The Umatilla's 2015 Travel Analysis Report counts about 4,600 miles of road, states that Region 6 road funding "is now less than 20 percent of 1995 levels," and estimates more than \$6.6 million a year for maintenance against average road funding of about \$450,000 (2011 to 2015), of which about \$80,000 went to maintenance.
- **Density is already high.** Blue Mountains Biodiversity Project reports about 9,670 miles of road on the Malheur and 9,119 on the Wallowa-Whitman, with average open road density on the Malheur of about 3.56 miles per square mile.

Request

- Carry forward open road density and elk security standards, applied by season, and adopt the minimum road system findings of each forest's travel analysis. Do not open inventoried roadless areas to new road construction.

5. Streams, fish, and drinking water

The Forest Service's own climate vulnerability assessment for this region, *Climate Change Vulnerability and Adaptation in the Blue Mountains Region* (Halofsky and Peterson, eds., 2017, PNW-GTR-939), is direct about what is coming and what managers should do.

Finding (PNW-GTR-939, Chapter 5, Isaak et al.)	Value
Summer air temperature increase	+3.3 C by the 2040s; +5.4 C by the 2080s
Average summer stream temperature increase	+0.9 C by the 2040s; +1.9 C by the 2080s
Bull trout streams exceeding 11 C	38 percent mid-century; 58 percent late century
Spring Chinook streams exceeding 19 C (analysis area)	24 to 38 percent by the 2080s

Source: Isaak et al. 2017, Chapter 5 in PNW-GTR-939, pp. 105-120.

The same chapter's adaptation strategies read like a list of what Alternative 2 weakens:

- "Maintain or restore riparian vegetation to ensure channels are not exposed to increased solar radiation" (p. 131).
- "Disconnect roads from streams to reduce drainage efficiency" and use stream-simulation designs for culverts (p. 128).
- Manage "livestock grazing to restore ecological function of riparian vegetation" (p. 131).
- **The law requires riparian widths.** The 2012 Planning Rule requires plans to "establish width(s) for riparian management zones around all lakes, perennial and intermittent streams, and open water wetlands," with special attention to about 100 feet from perennial streams and lakes (36 CFR 219.8(a)(3)), and to include "standards or guidelines" that maintain or restore ecological integrity (219.8(a)(1)).
- **Listed fish depend on these forests.** The plan area holds ESA-listed steelhead, spring/summer Chinook salmon, and bull trout, managed for decades under the PACFISH and INFISH riparian strategies.
- **People drink this water.** The forests supply drinking water for about 40,000 people, including roughly 10,000 in Baker City.

Request

- Adopt riparian management zone widths and standards at least as protective as current PACFISH/INFISH direction, written as standards, not desired conditions or objectives. Address grazing in riparian areas, including permanently closing vacant allotments on salmon and steelhead streams.

6. Roadless areas and wilderness

- **The agency's own prior plan recommended wilderness.** The 2018 preferred alternative recommended about 70,500 acres (about 1.3 percent of the planning area). Alternative 2 recommends none. The August 2025 notice for this revision stated that no lands from the wilderness evaluation were carried forward as recommended wilderness in the preliminary plan.
- **The inventory is far larger.** A 2010 Forest Service inventory identified 76 areas totaling about 705,000 acres (about 13 percent of the forests) with potential wilderness character. Alternative 3's roughly 34,000 acres is under 5 percent of that.
- **Wilderness is multiple use.** The agency reportedly rejected some alternatives as not meeting the Multiple-Use Sustained-Yield Act. That Act says: "The establishment and maintenance of areas of wilderness are consistent with the purposes and provisions of" the Act (16 U.S.C. 529).
- **Roadless land starts fewer fires.** Using the Forest Service's InFORM fire occurrence records for 1992 to 2024, Aplet et al. (2026) found ignition density of 7.99 fires per 1,000 hectares within 50 meters of roads, versus 1.97 in Inventoried Roadless Areas and 1.75 in wilderness. The argument that roadless areas must be opened to reduce fire risk has to account for the ignitions roads bring.

Request

- Keep all ~722,000 inventoried roadless acres out of timber-emphasis and general-forest allocations. Recommend wilderness at no less than the 2018 level of about 70,500 acres, drawing on the 2010 inventory, including additions to the Wenaha-Tucannon, North Fork Umatilla, Eagle Cap, and Strawberry Mountain wildernesses.

7. The timber target does not match the record

Forest	Alt 1	Alt 2	Alt 3
Malheur	44	176	66
Wallowa-Whitman	38	125	61
Umatilla	24	76	34
Total (MMBF per year, first decade)	106	377	161

Source: East Oregonian, June 10, 2026, reporting Draft EIS projections.

- The Wallowa-Whitman sold an average of 203 million board feet a year from 1976 to 1990 but has not sold more than 53 million in any year since fiscal 1992. Alternative 2 assumes 125.
- The 2018 plan projected 205 million board feet a year across all three forests; Alternative 2 nearly doubles that.
- Recent reporting notes the plan is being finalized amid "dramatic staffing cuts." Output targets set far above capacity create pressure to meet volume by cutting the largest trees and the most productive streamside stands, exactly the resources the assessment shows are already departed.

8. The 2019 lesson

In March 2019 the Forest Service withdrew the 2018 plans after more than 300 organizations and individuals filed objections, including timber and grazing interests, counties, conservation groups, state wildlife agencies, and the Nez Perce Tribe and Confederated Tribes of the Umatilla Indian Reservation. Acting Deputy Chief Christopher French wrote that "the resulting plans are difficult to understand." Conservation objectors cited insufficient enforceable standards and weak protection for large trees and streams.

Alternative 2 answers that history by removing more enforceable standards, not fewer. A plan built mostly on desired conditions and objectives is harder to understand and harder to hold to, which is the problem the agency itself identified in 2019.

9. Where Alternative 3 needs strengthening

Alternative 3 is the best starting point, but by several accounts it too relaxes some current protections. Greater Hells Canyon Council describes it as doubling current logging, loosening limits on old-growth logging and road building, and expanding logging in riparian areas, while keeping elements of roadless protection and recommending about 35,000 acres of wilderness. East Oregonian reports it would keep the 21-inch limit only as a guideline, with a 30-inch threshold for grand fir. The fix is to merge Alternative 3's allocations with Alternative 1's enforceable standards:

- 21-inch limit as a standard, with narrow documented exceptions.
- Open road density and elk security standards retained.
- Riparian buffers at PACFISH/INFISH levels, as standards.
- All inventoried roadless areas retained; wilderness recommended at or above the 2018 level.
- Timber objectives tied to actual capacity and restoration need.

10. Specific requests

- Select Alternative 3, modified to carry forward the enforceable standards of Alternative 1.
- Write large-tree, road density, and riparian protections as standards in the plan, not as desired conditions, objectives, or guidelines.
- Disclose in the Final EIS how Alternative 2 is reconciled with the 2024 assessment's findings on old-tree decline and open road density.
- Analyze the carbon consequences of removing large trees, using Forest Inventory and Analysis data for these forests.
- Base road decisions on each forest's travel analysis and a funded minimum road system.
- Honor the treaty-reserved rights of the Confederated Tribes of the Umatilla Indian Reservation and the Nez Perce Tribe, including fish, game, and first foods that depend on the protections above.
- Explain how the timber projections in each alternative relate to actual sale history and current staffing.

Conclusion

On old trees, roads, streams, and wilderness, the Forest Service's own record points the same direction. Its assessment shows old forest still declining. Its research in these forests shows elk avoid roads. Its climate scientists say to protect streamside shade and disconnect roads from streams. Its own 2018 plan recommended wilderness. Alternative 2 goes against all of it. I respectfully ask the Forest Service to select Alternative 3, strengthened with the enforceable standards of the 1990 plans.

Respectfully submitted,

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References

- USDA Forest Service. 2026. Blue Mountains Forest Plan Revision, Draft Environmental Impact Statement. Comment period July 2 to September 30, 2026.
<https://www.fs.usda.gov/r06/umatilla/planning/blue-mountains-forest-plan-revision>
- USDA Forest Service. 2024. Draft Assessment, Forest Plan Revision: Wildlife Species and Habitats of Interest (Feb. 6, 2024).
https://www.fs.usda.gov/sites/nfs/files/legacy-media/umatilla/Draft_WildlifeSpeciesHabitatsOfInterestReport.pdf
- USDA Forest Service. 2025. Malheur, Umatilla, and Wallowa-Whitman National Forests; Revision of the Land Management Plans. Federal Register, Aug. 5, 2025.
<https://www.federalregister.gov/documents/2025/08/05/2025-14846>
- USDA Forest Service, Umatilla National Forest. 2015. Travel Analysis Report, Travel Management Rule, Subpart A.
<https://www.fs.usda.gov/sites/nfs/files/legacy-media/umatilla/FINAL-TAR1066.pdf>
- Halofsky, J.E.; Peterson, D.L., eds. 2017. Climate change vulnerability and adaptation in the Blue Mountains region. Gen. Tech. Rep. PNW-GTR-939. USDA Forest Service, Pacific Northwest Research Station.
<https://research.fs.usda.gov/treearch/53937>
- Isaak, D.J.; et al. 2017. Climate change, fish, and aquatic habitat in the Blue Mountains. Chapter 5 in PNW-GTR-939.
https://www.fs.usda.gov/rm/pubs_journals/2017/rmrs_2017_isaak_d002.pdf
- Rowland, M.M.; Wisdom, M.J.; Johnson, B.K.; Kie, J.G. 2000. Elk distribution and modeling in relation to roads. *Journal of Wildlife Management* 64(3): 672-684.
<https://www.dfw.state.or.us/wildlife/research/docs/ELKElkdistributionandmodellinginrelationtoroads.pdf>
- Wisdom, M.J.; Preisler, H.K.; Naylor, L.M.; Anthony, R.G.; Johnson, B.K.; Rowland, M.M. 2018. Elk responses to trail-based recreation on public forests. *Forest Ecology and Management* 411: 223-233.
<https://research.fs.usda.gov/treearch/56220>
- Naylor, L.M.; Wisdom, M.J.; Anthony, R.G. 2009. Behavioral responses of North American elk to recreational activity. *Journal of Wildlife Management* 73: 328-338.
- USDA Forest Service. The Starkey Project. Pacific Northwest Research Station.
<https://research.fs.usda.gov/pnw/projects/starkeyproject>
- Mildrexler, D.J.; Berner, L.T.; Law, B.E.; Birdsey, R.A.; Moomaw, W.R. 2020. Large trees dominate carbon storage in forests east of the Cascade Crest in the United States Pacific Northwest. *Frontiers in Forests and Global Change* 3: 594274. <https://www.frontiersin.org/journals/forests-and-global-change/articles/10.3389/ffgc.2020.594274/full>
- Aplet, G.H.; Hartger, P.; Dietz, M.S. 2026. Three-decade record of contiguous-U.S. national forest wildfires indicates increased density of ignitions near roads. *Fire Ecology*.
<https://link.springer.com/article/10.1186/s42408-026-00450-2>
- 36 CFR 219.8, Sustainability (2012 Planning Rule).
<https://www.ecfr.gov/current/title-36/chapter-II/part-219/subpart-A/section-219.8>
- 16 U.S.C. 529, Multiple-Use Sustained-Yield Act (wilderness consistent with the Act's purposes).
- Wallowa County Chieftain. 2023. Judge sides with environmental groups in 'Eastside Screens' case (Aug. 31, 2023 findings of Magistrate Judge Andrew Hallman).
<https://wallowa.com/2023/09/01/judge-sides-with-environmental-groups-in-eastside-screens-case/>
- East Oregonian. 2026. Logging could triple in Blue Mountains national forests under plan (June 10, 2026).
<https://eastoregonian.com/2026/06/10/logging-could-triple-in-blue-mountains-national-forests-under-plan/>
- East Oregonian. 2026. Blue Mountain Forest Plan revision draft study coming July 2 (July 1, 2026).
<https://eastoregonian.com/2026/07/01/blue-mountain-forest-plan-revision-draft-study-coming-july-2/>
- Capital Press. 2018. Forest Service to reveal final draft of revised Blue Mountains plan (June 26, 2018).
<https://capitalpress.com/2018/06/26/forest-service-to-reveal-final-draft-of-revised-blue-mountains-plan/>
- Spokesman-Review. 2019. Blue Mountains forest plans rejected, called 'difficult to understand' (Mar. 20, 2019).
<https://www.spokesman.com/stories/2019/mar/20/blue-mountains-forest-plans-rejected-called-diffic/>

- OPB. 2025. Eastern Oregon's Blue Mountains have big changes on the horizon (Oct. 4, 2025).
<https://www.opb.org/article/2025/10/04/blue-mountains-big-changes/>
- Oregon Wild. 2026. Conservation groups challenge Forest Service over elimination of elk habitat protections.
<https://oregonwild.org/conservation-groups-challenge-forest-service-over-elimination-of-elk-habitat-protections/>
- Greater Hells Canyon Council. 2026. The most important comment period for Blues forest planning is live.
<https://www.hellscanyon.org/single-post/the-blue-mountains-forest-plan-revision-is-upon-us>
- Blue Mountains Biodiversity Project. 2026. Blue Mountains Forest Plan Revision Action Alert.
<https://bluemountainsbiodiversityproject.org/2026/07/13/blue-mountains-biodiversity-project/>
- BlueRibbon Coalition. 2026. Blue Mountains Forest Plan Revision to Shape Access on 5 Million Acres.
<https://blueribboncoalition.org/blue-mountains-forest-plan-revision-to-shape-access-on-5-million-acres-add-your-voice/>