

Data Submitted (UTC 11): 9/27/2026 2:31:26 AM

First name: Sarah

Last name: Cuddy

Organization:

Title:

Comments: Dear Blue Mountains Forest Plan Revision Team,

We are a family from Baker City, Oregon, and the owners of Wallowa Llamas, a small business that operates in and depends on the Eagle Cap Wilderness and Hells Canyon Wilderness. We recreate throughout the Wallowa-Whitman National Forest and the broader Blue Mountains region with our family, friends, guests, and pack llamas. We write to urge the Forest Service to revise the proposed alternative 2 for the Blue Mountains Forest Plan with clear, durable, and enforceable standards that protect clean water, large trees, roadless lands, wildlife habitat, and the outstanding recreation values of northeast Oregon.

For our family, these public lands are part of daily life. They are where we hike, fish, camp, observe wildlife, and spend time together. They are also the foundation of our small business. Visitors come to this region because the Eagle Cap, Hells Canyon, and the surrounding national forests offer something increasingly rare: clean streams, intact mountain landscapes, quiet trails, wildlife, dark skies, solitude, and a real sense of wildness.

The Blue Mountains Forest Plan will guide management across nearly 5 million acres of the Wallowa-Whitman, Umatilla, and Malheur National Forests for decades to come. Its decisions will shape the headwaters and forests that support communities such as Baker City, as well as the recreation economy and wildlife that make this region distinctive.

While these forests are essential to people and local businesses, we also believe wild places have intrinsic value. These places have value in and of themselves. We have an obligation to leave future generations, and the wildlife that depend on these lands, with functioning, connected, and genuinely wild landscapes.

We therefore urge the Forest Service not to adopt Alternative 2 as written. The preferred alternative would move in the wrong direction by providing excessive flexibility, increasing logging pressure, weakening protections for old and mature trees, and exposing roadless areas to additional roads and commercial logging. Instead, the Forest Service should revise the final plan to include the following enforceable safeguards.

Protect large, mature, and old trees. Please retain and strengthen mandatory protections for trees over 21 inches DBH. These large trees are an irreplaceable part of the Blue Mountains landscape: they provide complex habitat, store disproportionately large amounts of carbon, contribute to forest resilience, and are among the most fire-resistant trees in the forest. Trees over 21 inches represent only about 3 percent of the forest yet store approximately 42 percent of its aboveground carbon. Removing their protection would sacrifice values that cannot be restored within a meaningful human timeframe. Guidelines or discretionary language are not enough; the final plan must include binding standards that protect these trees.

Protect roadless lands and evaluate Wilderness-quality areas. Please establish a forest-level roadless management area comparable to Alternative 3's 2A Roadless Area, with standards that mirror the protections of the 2001 Roadless Rule. The plan should permanently protect the approximately 722,000 acres of roadless land in the planning area from commercial logging and new road construction, regardless of future changes in national policy. These lands are critical to clean water, wildlife security, backcountry recreation, and the unfragmented character that supports wilderness experiences and local recreation businesses.

For Wallowa Llamas, the integrity of the country surrounding designated Wilderness is especially important. The Eagle Cap and Hells Canyon Wilderness areas do not exist in isolation. Their ecological health and visitor experience depend on the broader network of roadless lands, quiet backcountry, connected habitat, and clean

headwaters around them. Guests do not travel to northeast Oregon simply to see a boundary line on a map; they come to experience a whole landscape that still feels intact, remote, and alive.

Make habitat connectivity a forest-wide commitment. The Blue Mountains sit at a major ecological crossroads connecting the Rockies, Cascades, Great Basin, and Columbia Plateau. The final plan should establish a specific management area for habitat connectivity and require meaningful standards across all relevant plan areas, not merely vague aspirations applied project by project. Connectivity is essential for elk, deer, salmon, steelhead, wolverines, American marten, and many other species to move between seasonal habitats, maintain genetic diversity, and adapt to wildfire, drought, and climate change.

Restore measurable road-density standards for elk and deer. We oppose replacing enforceable motorized-access limits with a nutrition-based approach that does not provide secure habitat. The region already contains nearly 26,000 miles of road, and additional roads fragment habitat, increase disturbance, create erosion risks, and make the Forest Service's maintenance burden worse. The plan should reinstate quantitative, science-based open-road density standards, such as 1.5 miles per square mile where appropriate, to provide elk and deer with the habitat security they need. These protections would also benefit hunters, hikers, pack-animal users, and others who seek quieter, less fragmented recreation settings.

Maintain mandatory riparian protections. Please retain quantitative PACFISH and INFISH standards rather than replacing them with flexible guidance such as "when feasible." The Wallowa-Whitman, Umatilla, and Malheur National Forests contain the headwaters of rivers and streams that supply drinking water to communities including Baker City, La Grande, and Walla Walla. Mature forests, intact riparian areas, and healthy streams naturally filter water, reduce erosion, support fish and wildlife, and sustain recreation. In a dry region where clean water is fundamental to communities, agriculture, wildlife, and local economies, these protections must be mandatory and enforceable.

Our family and business are deeply grateful for these public lands. We want the Forest Service to manage them with an eye toward the long term: for clean water, healthy wildlife populations, intact old forests, resilient ecosystems, meaningful recreation, and the inherent value of wild places. Please select or develop an alternative that genuinely improves on the 1992 plans rather than weakening existing safeguards.

We respectfully ask the Forest Service to adopt a final plan that:

Retains mandatory protections for trees over 21 inches DBH and strengthens protections for mature and old forests.

Creates durable, forest-level protection for all roadless areas and carefully evaluates additional Wilderness-quality lands.

Establishes an enforceable, cross-forest habitat-connectivity management strategy.

Restores quantitative road-density standards that provide secure habitat for elk, deer, and other wildlife.

Retains mandatory PACFISH and INFISH protections for streams, riparian areas, and aquatic habitat.

Prioritizes clean water, intact landscapes, and long-term ecosystem resilience over short-term extraction.

Please protect the lands that sustain our Baker City community, our family, our recreation-based business, and the wild character of northeast Oregon. Reject alternative 2 as it's currently written.

Sincerely,

Sarah Cuddy and Ethan Wolston

Baker City, Oregon

Owners/Operators, Wallowa Llamas