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Comments: October 5, 2026Citizens for Balanced UseKerry White4000 Blackwood RoadBozeman, Montana 59718 kerry@balanceduse.org 406-600-4228Via Email and Certified MailMike Boren, Under Secretary for Farm and Foreign Agricultural Services U.S. Department of Agriculture 1400 Independence Avenue, SW Washington, DC 20250 Email: Mike.Boren@usda.govKenneth Verheyen, Under Secretary for Natural Resources and Environment U.S. Department of Agriculture 1400 Independence Avenue, SW Washington, DC 20250 Email: Kenneth.Verheyen@usda.govThomas Schultz, Chief, U.S. Forest Service 1400 Independence Avenue, SW Washington, DC 20250 Email: Tom.Schultz@usda.govChris French, Deputy Chief, U.S. Forest Service 1400 Independence Avenue, SW Washington,DC 20250 Email: Chris.French@usda.govcc: sm.fs.webmaster@usda.govRe: Formal Request to Rescind the Draft Environmental Impact Statement for the Blue Mountains Forest Plan Revision and Request for MeetingDear Under Secretaries Boren and Verheyen, Chief Schultz, and Deputy Chief French:I write to formally request that the U.S. Forest Service pull and rescind the Draft Environmental Impact Statement (DEIS) for the Blue Mountains Forest Plan Revision (Malheur, Umatilla, and Wallowa-Whitman National Forests). The DEIS is fundamentally flawed, factually inaccurate, and procedurally improper. It relies on a deceptive narrative to advance a preferred alternative that misrepresents historical management, violates the National Environmental Policy Act (NEPA), and ignores the legal realities of the 2001 Roadless Area Conservation Rule (RACR).WHY THIS IS A NATIONAL AND GLOBAL CONCERNThe stakes extend far beyond northeastern Oregon and southeastern Washington. Massive catastrophic fires[mdash]exacerbated by decades of overgrown, under-managed forest conditions resulting from non-implementation of the 1990 Plans' authorized timber harvest and road access regimes[mdash]have destroyed human lives, displaced communities, and devastated wildlifeacross millions of acres. These fires have become one of the nation's most severe pollution crises, blanketing entire regions in hazardous smoke and releasing stored carbon on a scale that degrades air quality far beyond the forest boundary.The Blue Mountains landscape governs headwaters feeding the Columbia River Basin and holds significant old-growth carbon stocks; therefore, the impacts of mismanaging it are felt nationally and globally. When an agency truncates public comment and misstates the record in a plan governing such values, it suppresses meaningful scrutiny by every stakeholder downstream, downwind, and affected by the resulting neglect. This concern aligns with the access-to-information principles reflected in international environmental governance frameworks such as the Aarhus Convention.1. THE DEIS DECEPTIVELY MISCHARACTERIZES THE 1990 FOREST PLANS AS "PASSIVE"The DEIS describes the 1990 Plans as "outdated," "passive," and lacking "active management" (DEIS p. 24). This is factually incorrect. The 1990 Plans were aggressive, production-oriented frameworks designed for high-volume timber harvest (144 MMBF annually) and high road density (up to 2.5 miles per square mile in production areas, 1990 Plan p. 3-1).[bull] They explicitly opened roadless areas for development: 130,510 acres of inventoried roadless areas were designated "available for development" (1990 Plan p. 4-10).[bull] They utilized active silviculture: clearcutting and shelterwood systems to create "tree-farmed" mosaics of even-aged stands (1990 Plan pp. 4-14, 4-56).By framing this industrial model as "outdated science," the agency misleads the public about the options genuinely available for active forest management.2. THE DEIS FALSELY CLAIMS THE 1990 PLANS LACKED ECOLOGICAL SUSTAINABILITYThe DEIS asserts that Alternative 1 provides no direction for "terrestrial ecosystem integrity" and was "not designed to provide for ecological sustainability" (p. 24). The 1990 Plans expressly included goals for Soil Productivity, Water Quality and Quantity, Wildlife Habitat, and Fish Habitat (pp. 4-1 to 4-2). Dismissing these multi-resource goals because they predate modern terminology is not analysis[mdash]it is omission. In 1990, sustainability meant Sustained Yield of timber and wildlife, achieved through aggressive management, not passivity.3. THE DEIS MISREPRESENTS OLD-GROWTH PROTECTIONS AND THE EASTSIDE SCREENSThe DEIS implies the 1990 Plans rigidly protected large trees and frames replacement of the Eastside Screens as a benefit (p. 19). In reality, the Eastside Screens were a production constraint, not a conservation mandate. Only about 106,000 acres of non-wilderness old growth were protected (p. 2-17), and old-growth habitat was provided at levels the plan itself called "higher than necessary"

merely to satisfy pileated woodpecker requirements (p. 4-12). The plans actively promoted cutting to create young, productive stands.4. THE DEIS MISSTATES THE "DESIRED FUTURE CONDITION" AND FIRE RISKThe DEIS implies the 1990 Plans were "inactive" and led to high-severity fire (p. 39). Their actual Desired Future Condition was an explicitly human-managed, "tree-farmed" mosaic of young, even-aged stands (pp. 4-14 to 4-15)[mdash]precisely the kind of actively managed landscape that reduces, rather than compounds, catastrophic fire risk.5. THE DEIS ILLEGALLY CONFLATES THE FOREST PLAN WITH THE PENDING ROADLESS RULE RESCISSIONThe DEIS presents Alternative 2 as offering increased access by assuming rescission of the 2001 RACR (pp. 58-61). This is a legal fiction:[bull] Separate legal processes: the Forest Plan Revision and the RACR rescission are distinct rulemakings; the agency cannot embed a pending outcome into the Forest Plan.[bull] Manipulated timeline: Forest Plan comment closed September 30, 2026, six days before the RACR rescission comment period ended October 6, 2026[mdash]pre-judging a separate proceeding.[bull] NEPA violation: presenting a contested, unsettled rule change as settled fact is a material misrepresentation.6. THE DEIS FAILS TO PROVIDE EQUAL TREATMENT OF ALTERNATIVES AND HARMS LANDOWNERSThe DEIS manufactures a false dichotomy[mdash]Alternative 2 = Access, Alternative 1 = Closed[mdash]by omitting any statement that Alternative 1 retains full 2001 RACR protections (pp. 58-61).Alternative 1 is constrained by the 2001 Rule, not the 1990 Plan. Many private inholders within Inventoried Roadless Areas have been harmed by the 2001 Rule's restrictions on access to inholdings, water systems, fences, and infrastructure. The DEIS steers them toward Alternative 2 as their only remedy, when its promised access depends entirely on a rescission that may never occur[mdash]leaving landowners worse off than a faithful return to the 1990 Plan's original access authorizations.7. REQUEST FOR CORRECTIVE ACTIONI request that the U.S. Forest Service:1. Rescind the current DEIS for its factual inaccuracies and procedural improprieties.2. Conduct a new analysis accurately representing the 1990 Plans as the robust, active management framework they were.3. Separate the Forest Plan Revision from the RACR rescission so the plan does not pre-judge that rulemaking.4. Provide equal treatment of alternatives, explicitly disclosing that Alternative 1 retains the 2001 RACR while Alternative 2 relies on an uncertain legal change.5. Correct all statements regarding the 1990 Plans' ecological goals, old-growth treatment,and Desired Future Condition.8. REQUEST FOR MEETINGThese issues require direct dialogue between Forest Service leadership and affected stakeholders. I request a meeting with Under Secretary Boren, Under Secretary Verheyen, Chief Schultz, or their designated senior representatives. Proposed agenda:[bull] Review of factual inaccuracies regarding the 1990 Forest Plans.[bull] Discussion of procedural improprieties concerning the Roadless Rule timeline.[bull] Strategies for rectifying the DEIS to comply with NEPA.[bull] Next steps for a transparent, scientifically sound planning process.Please contact Kerry White, kerry@balanceduse.org, 406-600-4228 within 10 business days to propose dates. We can meet via video conference or in person at a convenient location for both parties.Had the 1990 Plans been faithfully implemented over the past 35 years, our forests would be healthier, our local economies stronger, and our communities less exposed to the catastrophic fire and smoke crises now affecting the nation. We look forward to your prompt response.Sincerely,Kerry WhiteCitizens for Balanced UseCc: House Committee on Natural Resources; Senate Committee on Energy and NaturalResources; Government Accountability Office