Data Submitted (UTC 11): 10/1/2025 5:26:01 PM

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Title:

Comments: Blue Mountains Forest Plan Revision

Scoping Comment Letter

To: Blue Mountains National Forest Plan Revision Team

USDA Forest Service

From: Randal Son, 54 year resident on Upper Mill Creek

Re: Scoping Comments on the Preliminary Draft Proposed Land Management Plans for the

Malheur, Umatilla, and Wallowa-Whitman National Forests

I write as a resident of the Blue Mountains region who is directly affected by the decisions made in this forest plan revision. These forests are not just trees on a map - they are the source of our drinking water, the buffer against floods, the foundation of our community's health, and a place of belonging for people and wildlife alike.

Because of this, I urge you to adopt a forest plan that sets strong, enforceable standards to protect soils, watersheds, and old and mature forests. The draft proposals rely too much on commercial logging and flexible "guidelines," which are not adequate to safeguard the long-term health of these ecosystems.

The draft plans call for tens of thousands of acres of logging and "fuel treatments" each year. But heavy logging has not made our communities safer. In fact, large-scale thinning often leaves forests drier, more fragmented, and more vulnerable to severe fires. We all saw the consequences when fires last year burned through areas that had already been logged. Instead of continuing this cycle, the Forest Service should recognize that intact, mature forests are the most resilient to wildfire. Big, old trees help create cooler, moister microclimates that slow fire spread, and they store immense amounts of carbon that buffer us against climate change. Once cut, they take centuries to replace. Logging them undercuts both fire safety and climate resilience.

Protect Water and Soil

Our communities depend on clean water from these forests. The draft plan allows up to 20% of soils in a project area to be degraded before restoration is required. That is unacceptable. Healthy soils filter our water, prevent landslides, and keep streams running clear. Every time heavy equipment compacts soil and builds new roads, we increase flood risk and send more sediment downstream, threatening both people and fish.

The Forest Service should adopt a zero-tolerance standard for soil degradation and commit to removing old roads, not building new ones. Maintain the protections built into the current Inventoried Roadless Area rules.

Stronger Riparian Protections Needed

The proposed Aquatic and Riparian Conservation Strategy (ARCS) is weaker than the protections we had under PACFISH and INFISH. Without strong, enforceable riparian buffers,

streams will be at risk from logging and road-building. Cold, clean water is the lifeblood of our salmon and steelhead, and it is also the foundation of our municipal water supplies.

Ecosystem Services Matter More Than Timber Targets

The Blue Mountains forests provide us with clean water, carbon storage, wildlife habitat, recreation, and resilience in the face of climate change. These are far more valuable to our communities than the short-term income from timber sales. Yet the draft plans read as though logging targets are the driving priority.

As a community member, I ask the Forest Service to flip this script: manage first and foremost for ecosystem services and public safety, not timber outputs. That means keeping large, old trees standing, protecting soils and watersheds, and prioritizing restoration over extraction.

To conclude, I respectfully request that the revised forest plans:

- 1. Prohibit the logging of old and mature forests and large trees.
- 2. Strengthen, not weaken, protections for soils, watersheds, and riparian areas by maintaining Roadless Area rules.
- 3. Reduce reliance on logging-centered "fuel treatments" and instead focus on community safety through home hardening and defensible space.
- 4. Commit to letting forests grow back into old growth (proforestation) as a cost-effective, science-based strategy for resilience.

The Blue Mountains are our shared natural heritage. Please ensure that the new plans truly protect them for future generations by adopting clear, enforceable standards that put water, climate, and community resilience ahead of commercial logging.

Sincerely, Randal Son Resident of Walla Walla, Washington