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Comments: I am a lifelong Oregonian and I love to spend my time on public national forest lands. I frequently volunteer my time to get involved in the NEPA process for proposed USDA-FS projects. I have provided valuable input on plans and timber projects for our national forests and public lands.

I submit these comments on scoping for the Blue Mountains Forest Plan revision and summarily oppose the agencies' proposal to weaken forest and streamside protections for the region by removing enforceable standards that will otherwise cumulatively degrade ecological integrity, increase fire and insect outbreak risks, and amplify regional climate change impacts from logging-related greenhouse gas emissions, livestock grazing, and road building.

The revised Forest Plan must contain strong, enforceable standards with measurable objectives that protect mature and old forests, streams and water quality, wildlife, connectivity, unroaded areas, and carbon storage. Very few standards are included in the Forest Service's current draft plan. Rather, the Forest Service is relying heavily on voluntary, subjective, and largely unenforceable guidelines in the new proposal. The lack of standards gives the Forest Service broad discretion for logging and other actions, as long as they claim they are generally moving towards very subjective "desired conditions" overall. Strong standards are needed to protect, and enhance old-growth forests.

The Blue Mountains contain unique and irreplaceable habitat for numerous imperiled species such as wolverine, lynx, wolves, moose, and more. The large habitat being less fragmented will benefit everyone on a planetary scale, as the corridor is important on that kind of scale.

Focus on ecosystem integrity and old-growth forest qualities, not timber board-feet for near clearcut logging. Our oldest trees provide the most benefit for wildlife and the forest as a whole. Logging implementation needs more accountability, transparency, and environmental safeguards, not less!

Do away with loopholes, such as "site-specific amendments" that circumvent Forest Plan protections. The proposed Forest Plan would allow the agency to exempt individual timber sales and other projects from the agency's own Forest Plan rules- with no limit on the number or size of projects that can opt out of the agency's own Forest Plan rules.

Logging in the backcountry will not make communities safer. Protecting forests from logging does not increase their fire risk. See Dr. DellaSala of Conservation Biology Institute's comments about this proposal.

Grand fir are not a "threat" to Ponderosa pines. Large and old Grand fir trees provide crucial wildlife habitat, yet they are at documented deficits compared to historic norms.

Analysis and planning for the bloated roads system on these National Forests must be conducted before or as part of the Blue Mountains Forest Plan Revision process. The agency cannot adequately assess the effects of Forest Planning while ignoring the ubiquitous and widespread impacts of roads across the landscape. The Forest Service must conduct Travel Planning in order to have an accurate and relevant analysis of baseline and future conditions across the landscape.

We need more Wilderness to help preserve mature and old forests, clean water, and biodiversity. All undeveloped roadless areas that satisfy the definition of Wilderness found in the Wilderness Act must be evaluated and considered for recommendation as potential Wilderness areas during forest plan revisions. With the roadless rule planning to be rescinded, it is more important than ever to make this evaluation and

recommendation to designate wilderness before irreversible harm is done to this beautiful region.

A paradigm shift is needed in order to protect forests in the Blue Mountains and across the region. We are in the midst of the intertwined climate and biodiversity emergencies. It is time to take decisive actions to ensure that our forests are allowed to be a vital part of the solution to these crises. We urgently need a new model that prioritizes mature and old forests, wildlife and core habitats, landscape level connectivity, streams and clean water, soils, and carbon storage. We need to focus on protecting biodiversity and ecological integrity.

Thank you for your consideration.