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First name: Amber

Last name: Drossart

Organization:

Title:

Comments: My name is Amber and I live in New Albany, IN. While I live further east now, I grew up wandering the forests of Idaho, Oregon, Washington, and Montana. Born in Idaho to a ranching family, the outdoors have always been my great escape. Recently, wildfires have devastated our forest property and completely changed the landscape. While I can appreciate the service that fire provides to a forest ecosystem, the devastation left behind is not something I would wish on my worst enemy. If the surrounding forests had been managed better in the past 100 years, maybe there would have been enough old growth patches to stop the blaze. Building more roads and cutting down old trees is not going to reduce wildfire risk, but increase it. My family property, my history, was devastated by fires because the woods around had been heavily logged. Sunlight was allowed to reach the forest floor and so an abundance of baby trees and shrubs could germinate and thrive. These ladder fuels create the bridge for fires to climb up into the mighty old growth trees. Pardon my pun, but then it can spread like wildfire. This Revision to the plan could fundamentally change everything I remember about these forests, and open them up to greater wildfire risk.

I am writing to oppose Alternative 2 and ask the following concerns be addressed in the final environmental impact statement.

The roadless reclassification is not necessary to meet the plan's timber objectives. The DEIS states that adequate feasible acres exist under every alternative to meet that alternative's objectives, and that the difference in roadless protections has only a minimal influence on the overall timber program..

Removing protection from all 722,200 inventoried roadless acres, and moving 494,000 of them into a category suitable for commercial harvest, is therefore not justified by the stated purpose and need. I ask that these protections be retained.

The long term cost of new road construction is not adequately analyzed. The forest service can't manage the roads it already has under current resource constraints. The Forest Service already carries a deferred maintenance backlog of more than \$8.6 billion and is funded to maintain only a fraction of the roughly 370,000 miles of road it manages. This plan commits the three forests to maintaining hundreds of miles of road every year simply to hold the existing system together. The final EIS should fully analyze the lifetime construction and maintenance cost of any new roads, and weigh it against the public's ability to fund that obligation.

The economic analysis relies on gross jobs and labor income without disclosing the net return to the public. The DEIS presents job and labor income figures but does not clearly analyze the net fiscal return to the Treasury, including the risk of below cost timber sales once road and sale preparation costs are counted. I ask that the final EIS disclose the net public cost or return of the timber program under each alternative.

The wildfire analysis does not appear to account for the increased human caused ignition risk that new roads bring. The fire analysis centers on natural lightning ignitions, but expanding road access into previously roadless country predictably increases human caused ignitions, which are the leading source of wildfire starts nationally and are strongly associated with proximity to roads. Adding roads and logging old growth forests does not decrease wildfire risk. The final EIS should analyze how new road construction under Alternative 2 changes human ignition risk across the planning area.

Removing the large tree diameter limit sacrifices old forest values that took a century to grow. The diameter limit has protected the largest and oldest trees across these forests for decades.

I ask that the large tree protections in Alternative 3 be retained rather than eliminated.

The expansion of targeted grazing should be bounded and analyzed. The DEIS notes that targeted grazing under Alternative 2 may run at levels higher than the forage limits the rest of the plan allows, and flags a resulting risk to sensitive plants and soils. Overgrazing causes erosion which can lead to devastating mudslides in steep terrain.

I ask that targeted grazing be subject to the same forage limits as the rest of the plan and that its effects on sensitive resources be fully analyzed.

The mineral and commercial access effects of roadless removal should be disclosed as a purpose, not treated as incidental. The DEIS acknowledges that dropping the roadless designation may open certain areas to additional mineral exploration and development. If expanded access is an intended result, it should be stated plainly and its effects analyzed, so the public can weigh it.

For these reasons I ask that the Forest Service select Alternative 3, or at minimum retain the roadless protections and the large tree diameter limit and complete the additional analyses above before issuing a final decision. Please keep these acres protected for the people who own them.

Thank you.