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Blue Mountains Forest Plan Revision Team

Umatilla National Forest Supervisor's Office

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Re: Draft Environmental Impact Statement - Blue Mountains Forest Plan Revision; Opposition to Removal of Roadless Protections and Expansion of Motorized Access

To the Blue Mountains Forest Plan Revision Team:

I am writing to oppose the removal of existing roadless-area protections contemplated by Alternative 2 of the Draft Environmental Impact Statement for the Blue Mountains Forest Plan Revision. I urge the Forest Service to retain the existing inventoried roadless areas as protected roadless management areas, as proposed under Alternative 3, and to strengthen the final plans to preserve and, where possible, expand opportunities for nonmotorized backcountry recreation.

I submit these comments as a hunter and hiker who values the Blue Mountains not simply as a place to obtain access to public land, but as a place where a person can still leave roads, vehicles, and developed recreation behind. That type of experience is increasingly scarce. National forests should provide a range of recreational settings, and genuinely roadless country is an important and irreplaceable part of that range.

The scale of the change proposed under Alternative 2 is troubling. According to the DEIS, existing inventoried roadless areas encompass approximately 189,400 acres on the Malheur National Forest, 277,300 acres on the Umatilla, and 255,500 acres on the Wallowa-Whitman. Alternatives 1 and 3 retain additional prohibitions on road construction, road reconstruction, and timber harvest across those lands. Alternative 2 retains none of those roadless-area prohibitions and would make approximately 494,000 acres of former inventoried roadless land suitable as General Forest for timber production, harvest, and mechanical fuel treatment.

I recognize that adoption of Alternative 2 would not, by itself, immediately designate all of these lands for public motorized travel. The DEIS appropriately notes that site-specific designation of motorized roads, trails, and areas occurs through subsequent travel planning. But that does not make the forest-plan decision inconsequential. Removing roadless-area protection creates the programmatic opportunity for roads to be constructed or reconstructed into places where such development is presently prohibited. Once a road is cut into roadless country, the physical character and recreational experience of that landscape have changed, even if its initial purpose is timber management, fuels treatment, or administrative access.

The Forest Service's own analysis describes why this matters ecologically. The DEIS states that roadbuilding can fragment wildlife habitat, disturb wildlife, create hazards for animals crossing roads, alter meadow and grassland hydrology, and change plant communities. It recognizes that limiting roadbuilding and logging helps preserve

high-quality habitat, aquatic systems, natural processes, and unfragmented landscapes. Those values deserve protection precisely because they are difficult to restore after a road system has been established.

I am particularly concerned about elk. The DEIS recognizes that elk use of habitat depends not only on forage and hiding cover but also on distance from routes open to motorized vehicles, the season in which those routes are used, and the frequency of motorized use. It further acknowledges that reducing disturbance during hunting seasons can help retain elk on National Forest System lands.

That is consistent with my own experience as a hunter. I have participated in the elk hunt in the Watershed Unit, where the absence or severe limitation of motorized access creates an unusually wild hunting experience. It is a rare opportunity to hunt elk by entering country on foot rather than competing with a network of vehicles and roads. Experiences like the Watershed hunt demonstrate that limited motorized access is not an absence of recreational opportunity - it is itself a valuable recreational opportunity. Expanding road access into presently roadless country threatens exactly the qualities that make that hunt exceptional.

For that reason, I am also concerned that Alternatives 2 and 3 would no longer direct specific road-density requirements or road-reduction goals for elk habitat. Improving forage is valuable, but forage enhancement should not be treated as a substitute for habitat security. A highly productive forage area surrounded by frequently traveled motorized routes does not provide the same habitat value - or the same hunting experience - as secure country away from vehicles. I encourage the Forest Service to retain measurable standards or guidelines addressing motorized-route density, seasonal disturbance, and secure habitat for elk, particularly during hunting seasons and in areas historically managed to provide backcountry hunting opportunities.

The effects on fish and watersheds provide another strong reason to preserve roadless areas. The DEIS acknowledges that removing roadless protection under Alternative 2 could produce additional adverse watershed effects as roads, landings, and skid trails are constructed. It also recognizes that the high water quality of many existing roadless watersheds is associated with the absence of roads and logging.

Alternative 2 is projected to result in a moderate increase in sediment delivery compared with existing management, and the DEIS states that it may result in the greatest amount of direct impacts to aquatic species and their habitat. Its larger timber program would also substantially increase commercial traffic, with the DEIS estimating approximately 72,800 commercial vehicle trips per year under Alternative 2. The Forest Service acknowledges that increased hauling accelerates road-surface breakdown and increases the potential for sediment delivery to streams.

I recognize the legitimate need for active forest management and the value of reducing hazardous fuels where ecological conditions warrant it. I also recognize that roads can sometimes facilitate beneficial restoration, including culvert replacement, thinning, prescribed-fire preparation, and watershed work. But that does not justify converting virtually the entire existing inventoried roadless estate into lands where new road construction becomes an available management option.

Roadless watersheds should begin with a presumption of protection. Where an intact roadless watershed already supports high water quality and quality fish and wildlife habitat, keeping it intact is itself a form of effective management. Where ecological treatment is genuinely necessary, the Forest Service should first consider prescribed fire, hand treatment, aerial operations, temporary methods that do not establish permanent routes, and other techniques that preserve the area's roadless character.

I therefore urge the Forest Service to:

Select Alternative 3 rather than Alternative 2 with respect to inventoried roadless areas and retain MA 2A protections across the existing roadless estate.

Reject the wholesale conversion of inventoried roadless lands to General Forest where road construction, reconstruction, and timber access would become available options.

Preserve the approximately 722,000 acres of existing inventoried roadless lands across the three national forests and consider opportunities to increase the amount of land managed for roadless, primitive, and semi-primitive nonmotorized recreation.

Retain or establish meaningful standards for elk habitat security, including consideration of motorized-route density, distance from open routes, frequency of motorized use, and seasonal closures during important periods.

Give particular weight to preservation of roadless watersheds supporting high-quality aquatic habitat, rather than requiring those areas to prove a need for protection after road-building proposals arise.

Where management in roadless country is demonstrated to be ecologically necessary, favor methods that maintain roadless character and avoid creation of permanent motorized access.

Recognize backcountry hunting, hiking, solitude, and self-reliant recreation as affirmative multiple-use values rather than treating lack of motorized access as a deficiency to be corrected.

The DEIS itself describes primitive recreation as providing remoteness from human activity, solitude, self-reliance, challenge, risk, and discovery. Those experiences require places that remain difficult to reach. If every landscape becomes easier to access by vehicle, the Forest Service may increase one kind of recreational access while permanently eliminating another.

There are already many thousands of miles of roads in the Blue Mountains available to hunters, campers, woodcutters, and other forest visitors who depend upon motorized access. Roadless country supplies something fundamentally different. The appropriate multiple-use balance is not to make every acre accessible in the same way, but to retain a meaningful spectrum ranging from developed and roaded landscapes to large areas where human beings must travel under their own power.

My experience hunting the Watershed Unit has shown me the value of the latter. Opportunities like that are increasingly rare and are easily lost once roads penetrate previously roadless country. I ask the Forest Service to preserve those opportunities for hunters, hikers, wildlife, fish, and future generations by retaining roadless-area protections in the final Blue Mountains Forest Plans and by expanding, rather than contracting, the amount of country where nonmotorized backcountry recreation remains the dominant experience.

Thank you for considering these comments.

Sincerely,

Kurt F. Merg

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