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Comments: Thank you for the opportunity to comment. I have spent years hiking in the Blue Mountains, paddling down rivers, and monitoring timber sales as part of my job. The proposed plan has many concerning issues and does not disclose the impacts that will occur.

The proposed plan eliminates rules that have protected the Blue Mountains for decades.

A foremost concern for environmental groups is the elimination of the 21-inch rule, which prevents the logging of most large and old-growth trees. These trees are critical for wildlife, survive wildfires better than thickets of smaller trees, and are increasingly rare.

Two amendments to the original 1990 Blue Mountains management plan would also be discarded by the new plan. The Pacific Anadromous Fish Strategy and the Inland Native Fish Strategy, popularly known as PACFISH and INFISH, were established to protect riparian habitat and native fish by placing strict limitations on timber harvest and other activities near streams and rivers.

These rules would be replaced by flexible guidelines that environmental groups argue prioritize timber output over stream protections. Without protections, native species like chinook salmon, coho salmon and bull trout would be left vulnerable to commercial timber operations.

The proposed changes include the elimination of the roadless rule in the Blue Mountains. The decades-old rule places limitations on the number of roads that can be constructed and drastically limits timber harvesting in national forests. The proposed plan reduces protections for over 700,000 acres of roadless areas across three national forests. Since most wildfires start near roads this will increase wildfires as well as impact many species of wildlife, including game animals.

New roads could degrade drinking water and allow invasive species to proliferate, as can be seen by existing road networks - many of which are poorly maintained. Areas affected could include: Huckleberry Mountain, Bear Creek, Walla Walla River, Cottonwood Creek, Greenhorn Mountain, Glacier Mountain, Twin Mountain and others.

The Theodore Roosevelt Conservation Partnership, a Washington, D.C.-based advocacy group for hunters and anglers, says the roadless rule reaches far beyond protected areas.

"When road networks are too dense and the quiet, quality habitat that elk need shrinks, the animals are forced to search for more appealing country ... herds often head for the quiet side of the fence on private agricultural ground," says Tristan Henry, a field representative for the TRCP. "When elk seek food and/or security on private land, hunters may lose opportunity and landowners suffer crop damage and forage competition."

As someone who helped start three forest collaborations in Washington and Idaho, I see these changes as non-collaborative, very impactful to wildlife and the landscape, and likely to return the Forests to constant litigation and disputes. Please withdraw these proposals and work with the range of interests to protect rural communities, help economics, protect watersheds and wildlife and restore the damaged landscapes caused by too many roads and clearcuts in the Blue Mountains. Thank you.