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Comments: To: Blue Mountains Forest Plan Revision Team, USDA Forest Service

1. General Statement of Opposition

I am writing to express my strong opposition to the alternative plan outlined in the Draft Environmental Impact Statement for the Blue Mountains Forest Plan Revision. The current direction fails to prioritize the long-term ecological integrity, biodiversity, and climate resilience of the nearly 5 million acres across the Malheur, Umatilla, and Wallowa-Whitman National Forests.

These forests and mountains are an essential part of the character of Oregon—a living legacy that has deeply enriched the lives of generations of Oregonians and millions of visitors who come to experience our iconic landscapes and learn about the natural world. There are areas within these forests that are completely unique in the world, harboring rare ecosystems, ancient trees, and fragile watersheds that cannot be replicated anywhere else. They deserve to be preserved entirely unencroached upon by logging or other resource extraction industries.

Rather than establishing strong, enforceable safeguards for these irreplaceable landscapes, the alternative plan expands commercial resource extraction at the expense of intact ecosystems. I urge the Forest Service to withdraw or substantially revise the current proposal.

2. Key Areas of Concern

* Protection of Mature and Old-Growth Forests:

The proposed plan rolls back crucial safeguards for mature and large trees. Trees over 21 inches in diameter constitute a fraction of the forest canopy but store a disproportionate share of carbon, provide irreplaceable wildlife habitat, and are naturally fire-resistant. Eliminating or weakening clear diameter limits to accommodate increased commercial timber harvest threatens the few remaining intact stands in the region. The final plan must include clear, mandatory standards to protect mature and old-growth trees.

* Preservation of Roadless Lands and Cultural/Scenic Character:

I oppose any management classification that removes protections from designated or candidate roadless areas. Opening unroaded landscapes to road construction and heavy commercial operations degrades large, contiguous habitat blocks that native species—including elk and salmon—depend on for migration and climate adaptation. These unencroached areas are vital to maintaining the wilderness character and scenic beauty that draw people to Oregon's public lands. The revision must maintain and expand protections for roadless areas and prioritize landscape-level ecological connectivity across all three forests.

* Watershed Integrity and Aquatic Protections:

The plan lacks binding, measurable protections for riparian corridors and clean water resources. Healthy headwater streams are critical for cold-water fish populations and downstream agricultural and municipal supply. The Forest Service should strengthen riparian buffer standards rather than weakening protections in streamside zones.

* Enforceable Standards vs. Discretionary Guidelines:

A major flaw of the DEIS is its reliance on non-binding guidelines and broad agency discretion instead of firm, legal standards. To ensure accountability, the plan must establish measurable indicators and mandatory restrictions regarding road density, canopy retention, and soil protection.

3. Requested Action

I request that the Forest Service select or construct an alternative that:

- * Retains and strengthens enforceable protections for large and mature trees (≥ 21 inches DBH).
- * Permanently protects all inventoried roadless areas and unique, unroaded landscapes from road construction and commercial timber extraction.
- * Prioritizes science-based, non-commercial ecological restoration focused on small-diameter fuel reduction near vulnerable communities rather than landscape-scale commercial logging.

Thank you for considering these comments.

Anna Noak
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