

Data Submitted (UTC 11): 9/23/2026 8:46:31 AM

First name: Jim

Last name: Steitz

Organization:

Title:

Comments: I urge you to withdraw your plan to accelerate logging in the National Forests of the Blue Mountains by erasing vital guardrails for the ecological values to which the Forest Service is obliged as its first responsibility, regardless of the political directives raining down from Washington. The Blue Mountains are one of the few ecoregions of America with some prospect of retaining most of their biological assemblage from before European settlement. They deserve better, and Americans deserve better from the Forest Service, than sweeping this region into a morally and scientifically vacant demand for more commodities.

There is no grounds for removing the 21-inch maximum diameter limit on logging. Trees of this size are of immense ecological value despite constituting just 3% of the tree population by count in the Blue Mountains. The 721,000 acres of inventoried roadless areas should remain protected, regardless of the disingenuous repeal of the national Roadless Rule. These rules, as well as the Inland Native Fish Strategy, are responsive to the conclusions of biologists about the pillars of biodiversity and ecosystem function. They should not be discarded for the possible contingency that they might obstruct a timber manager's wish to meet a sale quota. Any timber sales should be driven by site-specific understanding of authentic, legitimate fuels reduction or ecological restoration. A forest plan that explicitly calls for tripling the timber output is madness, and cannot be sustained by the peculiar obsession with commodity production or 'dominance' emanating from this Administration.

The Forest Service already attempted to repeal these 'Eastside Screens' under duress of the previous iteration of this Administration, and was reversed in court. It is cynical and disingenuous to attempt another repeal with no evidence to claim that the Blue Mountains would be better off without its 21" trees. The existing plan amendment direction to move forest conditions toward 'late and old structure,' retain and recruit snags, enhance connectivity between older forest stands is more vital than ever amid a global biodiversity and climate crisis. Any new Forest Plan must affirm these goals, not substitute timber production. Moreover, this appetite for the largest trees belies the framing given by the Forest Service and industry flacks that the purpose of tripling logging volume is to reduce or mitigate wildfires. For decades, the Forest Service has employed equivocal language to repackage its timber goals as a more broadly palatable 'fuels reduction' effort, but the 'Preferred Alternative' exceeds the agency's own standard of semantic slippage. No concept of 'fuels reduction' can accommodate the proposal to triple timber volume and disavow any standards or indicators for old-growth ecosystems or measuring their potential destruction.

It is deeply telling that the Preferred Alternative proposes eliminating Pacific marten, Goshawks, and Pileated Woodpeckers as management indicator species that indicate old-growth forest and all other wildlife that depend on these stands. With no indicator species, timber staff will be free to raid old-growth forest for the higher volumes sought by industry without owning the consequences for biodiversity or carbon storage. Erasing indicator species also facilitates the conflation of old-growth logging with the average American's image of 'thinning' or 'fuels reduction' that enjoys broad acceptance but is less profitable. Rather than fulfill the well-considered and carefully written standards of the 21-inch screens, Inland Native Fish Strategy, and old-growth wildlife measures, the Preferred Alternative proposes disavowing this progress in favor of the antiquated view of National Forests as a sterile commodity cache to be taken without the annoying complications of ecological stewardship.

Where the Forest Service once gave promising indications of accepting its new role as a steward of an increasingly precious ecological treasure in an otherwise crowded, heating, drying world, the agency appears to have been emptied of its learned experience, succumbed to ideological pressure from above, and recommitted to squeezing even the relatively meager timber from the drier climates of the east side forests of the Blue Mountains. I urge you to reject the Preferred Alternative and to maintain protections for 21 inch trees, roadless

areas, riparian zones, and biodiversity. There exist abundant opportunities for productive work in thinning the second-growth stands leftover from previous logging, removing the surplus of roads that invite human fire ignition, and allowing the Blue Mountains as the few large biodiversity refuges left in contiguous America capable of adaptation with a changing climate. Maximizing timber production is the least value these forests can provide.