

Data Submitted (UTC 11): 9/23/2026 1:24:12 PM

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Comments: I oppose the preferred alternative in the draft Blue Mountains Forest Plan Revision. The Forest Service describes this revision as bringing 1990s-era plans up to date with current science. The preferred alternative does the opposite. It removes the enforceable protections that science shows are needed for cold water, native fish, and intact habitat, while substantially increasing timber harvest. Several of these changes conflict with the agency's obligations under the National Forest Management Act, the 2012 Planning Rule, the Endangered Species Act, the Clean Water Act, and NEPA. I ask the Forest Service to revise the plan before the final EIS, as detailed below.

I'm a fly angler from Bozeman, Montana, and I've wanted to fish the Blue Mountains for years. Specifically, I want to see the native redband and bull trout that these forests still support, in the cold, clean streams they depend on. Few places in the West still hold both species in watersheds this intact, and that is exactly what this plan puts at risk. Losing that chance to short-term timber and grazing gains would be devastating. Not only for me, but for the fish and wildlife that have no other place to go, and for everyone who hunts, fishes, hikes, and camps in these mountains now or will in the future. These are national forests, and their management affects everyone who owns them.

1. Eliminating aquatic and riparian standards conflicts with the Planning Rule and ESA commitments.

The draft plan removes every existing standard protecting streams, water quality, and habitat for ESA-listed salmon, steelhead, and bull trout. It replaces them with desired conditions and guidelines. Under the Planning Rule (36 CFR 219.7(e)), standards are mandatory constraints on projects, while guidelines allow deviation. So this is not a modernization. It removes the only enforceable backstop for aquatic habitat.

The Planning Rule requires plans to maintain or restore the ecological integrity of riparian areas and to establish riparian management zone widths around all lakes, perennial and intermittent streams, and open-water wetlands (36 CFR 219.8(a)(3)). It also requires plans to contribute to the recovery of federally listed species (36 CFR 219.9(b)).

The existing PACFISH/INFISH direction was adopted in part to meet ESA consultation obligations for listed fish. Replacing it with discretionary guidance weakens the protections those consultations relied on. Many streams in these forests are already listed as impaired for temperature and sediment under Clean Water Act Section 303(d), and the draft does not explain how removing enforceable protections is consistent with meeting state water quality standards.

Request: Keep enforceable riparian standards at least as protective as current PACFISH/INFISH direction, including fixed-width riparian management zones. Explain in the FEIS how the plan meets 219.8(a)(3), 219.9(b), and applicable water quality standards without them.

2. Logging and ground disturbance in riparian zones are not supported by the best available science.

The draft allows repeated commercial logging, including regeneration harvest, along with roads, skid trails, and landings inside riparian buffers. The scientific literature on streamside forests is consistent: they regulate stream temperature, supply large wood, filter sediment, and stabilize banks. Losing them degrades spawning and rearing habitat for decades. The Planning Rule requires the agency to use the best available scientific information (36 CFR 219.3), and the draft does not show how this level of riparian disturbance is consistent with that science.

Request: Prohibit commercial timber harvest, new roads, skid trails, and landings within riparian management zones. Allow restoration activities only where they are designed primarily to benefit aquatic resources. Address in the FEIS the scientific literature on riparian harvest and stream temperature.

3. Recommending zero wilderness is not a reasoned outcome of the required evaluation.

The Planning Rule requires the agency to identify and evaluate lands that may be suitable for wilderness and to decide whether to recommend them (36 CFR 219.7(c)(2)(v)). The preferred alternative recommends none, across nearly five million acres that still contain large, unroaded landscapes. The agency's evaluation identified these areas as having wilderness characteristics. A decision to recommend none of them needs a reasoned explanation tied to that evaluation, not a default. The same areas serve as climate refugia, secure wildlife habitat, and protected headwaters.

Request: Recommend the areas identified in the wilderness evaluation for designation, or at minimum a meaningful share of them. Explain in the FEIS, area by area, why any area was not recommended.

4. Moving Inventoried Roadless Areas into the timber base ignores their ecological value.

The draft moves about 722,000 acres of Inventoried Roadless Areas into a timber-emphasis land base. The ecological value of these areas does not depend on the national Roadless Rule. They are the largest intact habitat blocks remaining in these forests and function as strongholds for native trout, elk security, and wide-ranging species. The Forest Service has independent authority to protect them through plan components, and changes to the national rule make that responsibility more important.

Request: Place all Inventoried Roadless Areas in a management area that prohibits road construction and commercial timber harvest. Analyze in the FEIS the effects on habitat connectivity of converting these acres to a timber emphasis.

5. Removing road density standards contradicts the agency's own maintenance limits.

Road densities already exceed 3 miles per square mile across much of these forests, and the Malheur and Wallowa-Whitman each have more than 9,000 miles of road. Roads are among the largest sources of fine sediment to streams, and they fragment habitat and reduce big game security. The Forest Service's travel management rule (36 CFR 212.5(b)) requires the agency to identify the minimum road system needed for safe, efficient administration and resource protection. Removing density limits while the existing system already exceeds what the agency can maintain moves in the opposite direction.

Request: Keep enforceable road density standards, set objectives for reducing road density in priority watersheds, and tie road management to the minimum road system analysis.

6. Expanding grazing and weakening grazing standards puts listed fish at risk.

The draft makes grazing protections more subjective and voluntary and reopens closed or vacant allotments, including allotments that overlap streams supporting ESA-listed fish. Livestock grazing in riparian areas is a well-documented cause of bank erosion, channel widening, and elevated stream temperatures. Reopening allotments in listed-fish watersheds is inconsistent with the plan's obligation to contribute to species recovery.

Request: Keep closed and vacant allotments closed, especially in watersheds with ESA-listed fish. Adopt measurable, enforceable riparian grazing standards such as stubble height, bank alteration, and utilization limits, with clear consequences when they are exceeded.

7. The draft does not analyze a reasonable range of alternatives.

NEPA requires the Forest Service to analyze a reasonable range of alternatives. The draft offers no alternative that pairs increased restoration thinning with keeping enforceable aquatic, roadless, and road density protections. That option is plainly reasonable, and it matches the agency's stated goals of reducing wildfire risk and improving forest conditions. Without it, the public and the decision-maker cannot tell whether the increased timber output actually requires removing these protections, or whether the two are merely being bundled.

Request: Develop and analyze an alternative that achieves restoration and fuels objectives while keeping enforceable riparian, roadless, road density, and grazing protections.

Conclusion

Updating these plans is overdue. But a revision that strips enforceable protections while expanding logging, roads, and grazing does not reflect current science or the Forest Service's legal obligations. I urge the agency to address the issues above in the final EIS and to select an alternative that keeps these forests' water, fish, and wild places intact.

Please add me to the project mailing list for future notices, including the objection period.