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First name: Finnigan

Last name: Addams

Organization:

Title:

Comments: Dear Blue Mountains Plan Revision Team,

I am writing to comment on the Draft Environmental Impact Statement for the 2026 Blue Mountains Forest Plan Revision. These management plans will govern nearly five million acres for the next several decades, and I urge the agency to prioritize the long-term health of our public lands by adopting stronger protections for mature forests, wildlife connectivity, riparian systems, and roadless landscapes.

Mature and Old-Growth Forests: I am deeply concerned that the agency's preferred direction, Alternative 2, explicitly replaces the 1994 Eastside Screens and provides no required diameter limits for tree removal. Instead of discretionary guidelines that allow the commercial logging of trees of any size, the Forest Service must include clear, enforceable standards to protect both old growth and the next generation of large trees (over 21" DBH) to ensure ecosystem resilience and carbon stability.

Landscape-Scale Habitat Connectivity: The Blue Mountains function as a connectivity corridor of continental importance, linking the Rockies to the Cascades. The DEIS fails to fully grapple with this, and alternative 2 would decrease landscape connectivity and permeability by removing protections from Roadless Areas and other sensitive habitats. Forest planning is perhaps the best possible opportunity for planning for connectivity at the landscape scale; doing so at the project level is insufficient.

The new plans should integrate ODFW's Potential Wildlife Connectivity Areas (PWCAs), should create a management area for connectivity that connects across ranger districts and forests, and should also incorporate standards that seek to maintain and enhance connectivity through mandatory plan components across all relevant plan areas including Old Conifer Forest and Individual Old - Large Trees and Species Diversity.

The agency should also analyze for an alternative that includes the return of open road density standards (such as the 1.5 miles per square mile standard). These enforceable guardrails are necessary to limit human disturbance and keep elk and deer on public lands.

Riparian Areas: Healthy riparian ecosystems are vital for clean water and supporting nearly 80% of forest wildlife. I strongly oppose the transition from the mandatory PACFISH and INFISH standards to the broadly stated guidelines of the preferred alternative, which provide excessive discretion for logging and road-related activities in sensitive areas. The agency must also carry forward quantitative standards for water temperature, stream shade, and bank stability.

Wilderness Quality and Roadless Lands: It is illogical that the Forest Service has recommended zero acres of new Wilderness in its preferred alternative and only 34,000 in Alternative 3, despite previous planning efforts recommending over 500,000 acres. I am particularly alarmed that Alternative 2 assumes the national rescission of the 2001 Roadless Rule, which would result in a 15% increase in General Forest acres and immediately open these landscapes to commercial timber harvest and roadbuilding.

I request that the agency select an alternative that creates a specific management area similar to "Management Area 2A - Roadless Area" in Alternative 3. The agency should include plan components for this management area that mirrors the language in the 2001 Roadless Area Conservation Rule but does not rely on its existence to provide protections. These landscapes are highly valued in the Blues and the agency must provide lasting protections for the undeveloped character regardless of changes to national regulations.

Thank you for the opportunity to comment on this planning effort.

Sincerely,

Mx. Finnigan Addams