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Comments: My husband and I are road-tripping through Oregon and have visited these forests firsthand. We also traveled through Washington and were genuinely awed by the old-growth there. Photos don't do these lands justice, and I take pictures out there precisely because the cool glades, the trees, the animals and the water deserve to be seen. I want this land managed responsibly, and the draft environmental impact statement for the Blue Mountains Forest Plan Revision gives me serious reason to doubt it will be.

The DEIS builds its proposed action, alternative 2, on the assumption that the national Roadless Rule has already been rescinded, even though no such national decision has been made. The document states, at Substantive Issue 5 on Inventoried Roadless Areas, that "Alternative 2 analyzes the Blue Mountains planning area as if a national-level decision rescinds the Roadless Rule." Tables 14, 15 and 16 show zero acres of inventoried roadless area prohibition under alternative 2, while alternatives 1 and 3 retain roughly 722,000 acres in roadless management. The effect is to make land classified as suitable for timber production 17 percent larger than under alternative 1, all on the basis of a hypothetical federal action. Clean water and intact forest structure depend on those roadless protections remaining in place. I am asking the agency to either analyze alternative 2 with the Roadless Rule intact, or to fully disclose the probability and timing of rescission before any record of decision is signed, and to respond to this point specifically.

The sediment and stream restoration projections compound that concern. The DEIS acknowledges that alternative 2 would generate roughly 72,800 commercial vehicle trips per year on these road systems, more than double the estimated log haul relative to alternative 1, and yet Table 9 shows that the stream miles restored indicator under alternative 2 is, in the agency's own words, "Potential effects to water quality, water quantity, and riparian structural complexity and function from implementation of MA3A-RMA-OBJ-02 (stream miles enhanced or restored): Less than alternative 1." More road traffic delivering more sediment, paired with fewer restored stream miles than the no-action baseline, cannot be reconciled with a credible commitment to aquatic integrity. The agency should produce a net sediment budget for key watersheds and explain how a proposed action that delivers more sediment and less restoration than alternative 1 satisfies the 2012 Planning Rule's requirement to maintain or restore ecological integrity.

The treatment of targeted grazing also needs a fuller accounting. Alternative 2 introduces a targeted grazing objective not present in alternatives 1 or 3, explicitly acknowledging risks to native vegetation and riparian areas. The agency sets aside any detailed economic analysis of grazing's contribution on the grounds that anticipated local economic contributions would not vary between alternatives, yet the ecological risks tied specifically to alternative 2's targeted grazing program are material differences that affect plant communities, water quality and the animals that depend on these ecosystems. The agency should conduct a quantitative ecological analysis of that targeted grazing objective, including its risk to native vegetation and its relationship to existing allotment permits, before any alternative is selected. The forests my husband and I walked through deserve that rigor.