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Comments: I personally planted almost 500,000 trees in the Malheur National Forest. I am a retired reforestation contractor, and I am tired of the Forest Service acting like timber brokers. These forests need to be managed by conscientious experts, not salesmen. Please don't let corporate dictums cloud your judgement. That is what I am asking, and this revised plan is where it starts.

The most urgent problem I see is with targeted grazing under alternative 2. The agency dismisses grazing's economic contribution from detailed analysis in Substantive Issue 1 solely because the anticipated contribution to local economies would not vary between alternatives, yet alternative 2 introduces a targeted grazing objective not present in the other alternatives and then warns, under Rangelands, Forage, Livestock Grazing, that "Targeted grazing may be at levels greater than the allowable forage use in the plan components; therefore, there is a risk that targeted grazing for fine fuels reduction could lead to an increase of non-native forage and invasive species." That warning belongs at the center of the analysis, not at its edge. The agency has not provided a quantitative economic or ecological examination of what those risks mean for ranchers who hold existing allotment permits, for riparian areas, or for native plant communities. I want the agency to explain, with numbers and standards rather than qualitative assurances, how alternative 2's targeted grazing objective complies with existing permits and what ecological outcomes are projected before any alternative is selected.

Drinking water is the second problem. The agency's own document acknowledges that water originating on these forests reaches roughly 40,000 people, yet the water quality indicator in Table 9 shows alternative 2 produces a moderate increase in sediment delivery while alternative 3 produces only a low increase. The agency then asserts that neither action alternative would exceed regulatory thresholds, but it never identifies what those thresholds are, never discloses how close current conditions are to them, and never provides a quantitative sediment load estimate tied to applicable state water quality standards for any municipal watershed. I planted trees in this forest because healthy forest means clean water downstream. A qualitative assurance is not enough for 40,000 drinking water users. The agency must produce quantitative sediment analysis linked to specific water quality standards for every affected municipal watershed before this plan is finalized.

The third problem is scenic integrity. The agency dismisses scenic resources from detailed analysis by concluding that expected effects do not differ substantially among alternatives and that a more detailed or quantitative analysis is not required. But the same section of the document acknowledges that, under alternative 2, "Increased road density may make desired scenic integrity objectives more difficult to achieve long-term." Those two positions cannot coexist. If one alternative makes long-term scenic integrity objectives harder to achieve, that is a material difference, one that matters to outfitters, guides, and local tourism economies across Douglas County and the broader region. The agency should produce a quantitative scenic integrity comparison across alternatives, including projected road density changes in areas that would lose roadless designation under alternative 2, and stop treating this as a non-issue.

As a reforestation contractor who has worked this ground, I know the difference between managing a forest and selling it. This plan revision covers approximately 4.9 million acres of public land. The decisions made here will outlast the people making them. I am asking the agency to do the hard analytical work these questions demand.