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First name: Laura

Last name: Johnson

Organization:

Title:

Comments: The Forest Service is proposing to revise the land management plans for the Malheur, Umatilla, and Wallowa-Whitman National Forests through a Draft Environmental Impact Statement released in July 2026. Its proposed action, alternative 2, projects about 364 million board feet of timber a year against 108 million under current management, and the DEIS states that this volume 'would result in roughly 72,800 commercial vehicle trips per year.' The single most damaging flaw in the analysis is that alternative 2 is built on the assumption that the 2001 Roadless Rule will be rescinded nationwide, yet that decision has not been made. The DEIS concedes in the Substantive Issue 5 section that 'alternative 2 analyzes the Blue Mountains planning area as if a national-level decision rescinds the Roadless Rule,' an assumption that makes the land classified as suitable for timber production 17 percent larger than under alternative 1, while the same document says decisions about that rule are outside the scope of this revision. A proposed action constructed on a regulatory assumption that has not occurred and may never occur lacks a reasoned basis and does not present the public with a genuine comparison of real-world outcomes.

The document contains further analytical failures. First, Table 9 shows that alternative 2 would result in stream miles restored that are 'less than alternative 1,' the no-action baseline, while projecting a 'moderate increase in sediment delivery' from the added log haul; the agency never reconciles these outcomes with its ecological integrity obligations under 36 CFR 219. Second, Table 18 leaves the effects determinations for 13 of the 17 species in the biological assessment at least partly 'TBD,' so no completed ESA Section 7 analysis exists for bull trout, Chinook salmon, steelhead, wolverine, whitebark pine, and others at the time the public is asked to comment. Third, alternative 2 'replaces the Eastside Screens standard, allowing flexibility to remove large trees where consistent with project-level decisions,' removing the 21-inch retention standard that a federal court restored in March 2024 when it vacated the 2021 amendment that had weakened it, with no analysis of what losing those trees does to wildlife habitat and carbon. Fourth, alternative 2 recommends no wilderness at all, while alternative 3 recommends about 34,000 acres that have been managed as roadless for 24 years.

Based on the foregoing, I ask the agency to take the following actions before issuing a final EIS or record of decision: (1) re-analyze alternative 2 with the Roadless Rule in place, or disclose the probability and timeline of rescission and its legal basis before selecting that alternative; (2) release the completed biological assessment for all species listed in Table 18 and reopen the comment period for at least 60 days after that release; (3) retain the 21-inch large-tree standard as a plan standard, not a guideline, in every alternative; (4) provide a quantitative net sediment budget for key watersheds under each alternative tied to applicable state water quality standards, particularly for the approximately 40,000 drinking water users identified in the Water Uses section; (5) carry a recommended wilderness component into the proposed action; and (6) correct and reissue the internally contradictory carbon analysis described in the Percent Total Stand Carbon Change section before any record of decision is signed.