

Data Submitted (UTC 11): 9/30/2026 3:07:08 PM

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Comments: Dear Sirs and Madams:

Thank you for the opportunity to comment on the Blue Mountains Forest Plan Revision.

I have recreated across the Blue Mountains for over 40 years, and have become quite familiar with them. I commented on earlier forest plans in the region. I have been particularly interested and involved in the Malheur Forest, but have followed events in all three of the forests.

The proposed revision and its preferred alternative is very disappointing on many levels.

It appears to be primarily a plan to increase logging (4X on the Malheur!) in a fashion that ignores and degrades almost every other value and use. The proposal is particularly deficient in thinking carefully about ecological integrity and functioning. Ecosystems that conserve and promote intact old growth; that protect wildlife movement and habitat from disturbances; that sustain riparian zones and water quality -- essential for fish and community water supplies alike: these are not ecosystems that are primarily managed for logging.

It is untrue that commercial logging confers substantial protection against wildfire, especially when the larger older trees that most resist and survive wildfires are logged (already such a tiny percent of Blue Mountain forests!). Roaded woods experience more fire starts, because of humans; and they are not less likely to burn severely unless logged with that objective in mind -- which is not most commercial logging --and even then, only for 5-7 years on average. Red flag days account for increasing amounts of acres burned and burned severely -- logging will not help that.

Adaptation and resilience to climate change and its wildfires requires increasing the health of ecosystem functioning: your proposal will do the opposite. Nancy Langston's 1995 book, "Forest Dreams, Forest Nightmares", documented over 30 years ago the changing ability of portions of Blue Mountain forests to regenerate: mere foretaste of what is now developing. The fact is, removing ponderosa from some south slope areas will NOT return as ponderosa, whereas leaving them intact could preserve their contribution to wildlife, water, etc for longer.

Sound practical management depends on adequate and accurate knowledge, which science clearly favors fewer roads and less logging than you put forward. Your plan reminds me of the timber over-harvest of the 1980s, which has been well-understood as an epitome of unsustainability. Treating forests as a resource to exploit will result in a future impoverished Blue Mountain ecosystem -- and eastern Oregon's communities will fall on the same trajectory.

Alternative 2 is a Trojan horse. For the sake of short-term logging, long-term deterioration will accelerate.

Alternative 1 would be a better choice, but not as good as should be.

Truth is, none of the alternatives put forward are adequate to meet the challenge of climate change in the Blues.

The best remedy would be to start over with a science-based and science-goaled plan.