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Comments: Old-Growth Forest Network Comments on the Draft Environmental Impact Statement for the Blue Mountains Forest Plan Revision

Dear US Forest Service,

The Old-Growth Forest Network (OGFN) is a national conservation organization dedicated to identifying, protecting, and celebrating America's old-growth forests. Our 8,500 person membership reflects both local and national concerns regarding the management of the Malheur, Umatilla, and Wallowa-Whitman National Forests.

We have reviewed the proposed revisions and provide the following input for consideration in the development of the Final EIS and record of decision. We appreciate the purpose of forest plan revisions to reassess our ability to reach landscape goals in a changing world. However, we are concerned about the USFS proposed preferred Alternative 2, as it reduces plan-level protections and guidelines that protect ecosystem function across a vast landscape and greatly increases timber harvest volume, especially in a context where national-scope protection rules such as the Roadless Rule and the Travel Management may be removed.

The Blue Mountains encompass nearly 5 million acres of public national forest land of regional and national significance, as these forests contain some of the most important remaining mature and old-growth forests in the region. These forests provide habitat, clean water, carbon storage, recreational opportunities, and ecological connectivity across the greater Intermountain West. This area also contains approximately 721,000 acres of Inventoried Roadless Areas that may soon lose their protection status.

OGFN urges the Forest Service to reject Alternative 2 and instead retain and strengthen enforceable protections for mature and old-growth forests, large trees, Roadless areas, riparian forests, wildlife habitat, and landscape connectivity that is provided by Alternative 1; however, this may also be possible with a modified version of Alternative 3 that has robust large tree protections including retention of the Eastside Screens standard, limits on old-growth logging and building roads in these forests, and plan-level continuation of Roadless Rule protections.

The intensive logging history of eastern Oregon removed the largest and oldest trees, leaving a landscape where large trees and the oldest age classes are now relatively much less abundant even though they have outsized ecological importance. For example, research in WA and OR's national forests east of the Cascades demonstrated that trees 21 inches or greater in diameter account for approximately 3% of stems but store approximately 42% of aboveground carbon. This carbon pool took decades and centuries to accumulate and cannot quickly be replaced. These large trees increase diversity of habitat through the cavities, snags, and complex canopies that come with maturity, are more resilient to drought and fire, and help buffer surrounding forests from climate extremes.

The Blue Mountains Forest Plan Revision should retain a mandatory large-tree retention standard, including the existing 21-inch rule, and should establish enforceable protections for old-growth forest conditions within the plan's area. The proposed Alternative 2 would eliminate the Eastside Screens and their protections for large trees and old-growth forest structural conditions. Relying on desired conditions and flexible guidelines does not provide adequate, long-term protection for resources that cannot be replaced in a human lifetime, let alone a planning period and may return us to conditions where large trees were being lost too quickly, which prompted the Eastside Screen rule in the first place.

The proposed elimination of protections for approximately 721,000 acres of inventoried roadless areas is another major concern. The Blue Mountains contain approximately one-third of Oregon's inventoried roadless areas. We

urge the Forest Service to retain forest plan-level protections for these areas regardless of changes to national roadless policy. The revised plans should establish a management framework that prevents commercial logging and new road construction in Inventoried Roadless Areas, while allowing appropriate ecological restoration and wildfire-management activities currently provisioned by the Roadless Rule.

Roads fragment habitat, affect aquatic systems with runoff, sediment and chemical pollution, and can reduce the security of habitat for wildlife such as elk. The Blue Mountains are already heavily impacted by the road network, making the remaining areas of low road density particularly valuable.

Habitat

The Malheur, Umatilla, and Wallowa-Whitman National Forests contain headwaters and streams that support salmon, steelhead, trout, wildlife, agriculture, recreation, and downstream communities. PACFISH and INFISH were developed because riparian forests and aquatic systems require specific protections. Their replacement with flexible guidelines would remove an important layer of accountability from forest management. OGFN urges the Forest Service to retain mandatory PACFISH and INFISH protections and to maintain enforceable restrictions on logging and grazing in riparian areas.

We are also concerned by the proposed reduction in attention to species associated with dense mature and old-growth forests. Pacific marten, goshawks, and pileated woodpeckers are historically associated with old forest conditions and Alternative 2 does not assure that these conditions would be adequately protected.

Wildfire

Wildfire is an important ecological and community concern throughout the Blue Mountains. Forest planning must address wildfire risk and carefully designed fuels treatments can have an appropriate role without serving as a rationale for commercial logging of existing and future old-growth forests. Plan-level protections for inventoried roadless areas is a step toward reducing human-caused ignitions of forest fire, as they most often occur within a short distance of a road.

Of the alternatives presented, Alternative 1 retains the existing Eastside Screens, PACFISH/INFISH, road-density protections, and Roadless Rule protections. These protections provide an important baseline that should not be discarded. OGFN urges the Forest Service to build from the protections retained in Alternative 1.

At minimum, any final plan should:

- *Retain mandatory protection for trees 21 inches DBH and greater.
- *Establish enforceable standards for maintaining and recruiting mature and old-growth forest conditions.
- *Protect habitat conditions provided by snags and downed woody material
- *Maintain and enhance connectivity among mature and old-growth stands.
- *Retain PACFISH and INFISH and their enforceable riparian protections.
- *Provide plan-level durable protection for the approximately 721,000 acres of inventoried roadless areas in the planning area that does not make them available for commercial logging.
- *Protect eligible Wild and Scenic River values rather than reducing the number of eligible river miles.
- *Clearly distinguish wildfire-risk reduction from commercial timber production.
- *Evaluate the cumulative effects of roads, logging, grazing, and habitat fragmentation across all three National Forests.

The Old-Growth Forest Network urges the Forest Service to reject Alternative 2 and develop a revised plan that retains and strengthens enforceable protections for mature and old-growth forests, large trees, riparian systems, wildlife habitat, roadless areas, and landscape connectivity.

Thank you for considering these comments.

Sarah Adloo

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Old-Growth Forest Network

