

Data Submitted (UTC 11): 8/1/2026 1:27:02 AM

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Organization:

Title:

Comments:

Dear Forest Service officials:

Please accept, carefully consider, respond to in the final analysis, and include in this administrative record my following comments on this Blue Mountains forest plan revision process.

At the outset, I am a 74 year old retired environmental attorney and federal bureaucrat. I have hiked and explored on many Forest Service and other public lands in the West. I love public lands. I believe that they must be managed for their long term ecological health, sustainable resources, and native biodiversity. The rule of law and best available science should guide all management decisions affecting our public lands. This is especially crucial now with the rapidly worsening climate (see attachment) and extinction crises that demand bold and innovative solutions. Crass political and corporate pressure is harmful, undermines the rule of law and science, and should always be resisted as much as possible. These are public lands that belong to all Americans.

With this in mind, I believe that the current Trump administration is the most corrupt and incompetent in history. Graft, insider trading, bribes, and nepotism run rampant. I fear that the Forest Service's current Preferred Alternative here is largely an improper politically driven gift to timber companies and other special interests. This would fit the current pattern of other corrupt federal proposals and actions.

I generally support the No Action Alternative to maintain the current status quo. I do not trust the Forest Service to make objective and fair decisions in this hostile climate of widespread corruption. I believe that the alternatives presented are heavily biased and skewed toward exploitive land uses. Alternative 1 is the status quo; Alternative 2 is patently horrible; and Alternative 3 is somewhat less horrible. The action alternatives are not consistent with responsible and sustainable forest management.

For example, please restore enforceable protections for large trees. Please reject Alternative 2's maximum flexibility and instead include mandatory standards to protect all trees over 21 inches DBH. These trees represent just 3% of the forest but store 42% of its aboveground carbon and provide essential habitat for at-risk species like the American marten.

These forest plans should also integrate habitat connectivity at multiple levels. The Blue Mountains are a connectivity corridor of continental importance, and planning for connectivity at the project level is insufficient. Please establish a specific management area for habitat connectivity and include standards for connectivity across all relevant plan areas.

Please reinstate open road density standards for elk. I oppose the shift to a nutrition-based approach that lacks any enforceable limits on motorized access in sensitive habitats. Please restore quantitative road density standards (such as 1.5 miles per square mile) to provide the habitat security necessary to keep elk and deer on our public lands.

Please uphold and maintain mandatory riparian protections. I strongly oppose replacing the quantitative PACFISH and INFISH standards with flexible guidelines that use vague language like "when feasible". The plans must include mandatory standards for aquatic and riparian habitats to protect the systems that support over 80% of forest wildlife.

Please provide lasting, forest-level protection for all roadless areas and a harder look at potential Wilderness

quality lands. Please create a management area similar to 2A - Roadless Area in Alternative 3 that would provide permanent safeguards for the 722,000 acres of roadless lands. These plan components should mirror the 2001 Roadless Rule to ensure these landscapes are protected from logging and roadbuilding even if national regulations are rescinded.

I hope that my comments are helpful. I also hope that the relevant Forest Service and higher up USDA officials will have enough courage and integrity to make responsible decisions in the public interest that are consistent with the relevant laws and best available scientific information.

Thank you very much for your kind consideration.