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Comments: Comment on the Blue Mountains Forest Plan Revision Draft EIS (Malheur, Umatilla, and Wallowa-Whitman National Forests)

SUMMARY: I support Alternative 3, strengthened by carrying forward the enforceable standards in the 1990 plans (Alternative 1). Alternative 2, the preferred alternative, conflicts with the Forest Service's own assessment, its own research in these forests, and its own 2018 plan. A supporting document with full citations is attached.

1. Keep the 21-inch limit as a binding standard.

Concern: The agency's 2024 draft assessment found trees 150 years and older fell about 8 percent from 2001 to 2017, and that old single-story dry forest is "the most departed from historical conditions on all three" forests. Alternative 2 would remove size and species limits on cutting. Forest Inventory and Analysis data from these forests show trees 21 inches and larger are 3 percent of stems but hold 42 percent of aboveground carbon (Mildrexler et al. 2020). In 2023 a federal magistrate judge found the 2021 attempt to weaken the rule violated NEPA, NFMA, and the ESA.

Recommendation: Retain the 21-inch limit as an enforceable standard in all action alternatives.

2. Keep road density standards.

Concern: The Starkey Experimental Forest, the agency's own research site inside these forests, found elk select areas farther from open roads (Rowland et al. 2000). The 2024 assessment calls open road density a basic measure of wildlife disturbance. The Umatilla's 2015 Travel Analysis Report found annual maintenance needs of more than \$6.6 million against average road funding of about \$450,000 a year (2011 to 2015), and \$65 million to bring roads to standard. Removing road density limits, and opening roadless land to roads, adds roads the agency cannot maintain.

Recommendation: Keep open road density and elk security standards, and carry forward the minimum road system findings.

3. Keep enforceable streamside protections.

Concern: The agency's Blue Mountains climate assessment (PNW-GTR-939) projects 38 to 58 percent of bull trout streams will exceed 11 C by mid and late century. Its own adaptation strategies are to maintain riparian vegetation and disconnect roads from streams. These forests hold ESA-listed steelhead, Chinook, and bull trout, and supply drinking water for about 40,000 people. The Planning Rule (36 CFR 219.8(a)(3)) requires riparian management zone widths.

Recommendation: Adopt riparian buffers and standards at least as protective as the current PACFISH/INFISH direction, written as standards, not objectives.

4. Protect roadless areas and recommend more wilderness.

Concern: The 2018 preferred alternative recommended about 70,500 acres of wilderness. Alternative 2 recommends none, though a 2010 agency inventory identified 76 areas, about 705,000 acres, as potential wilderness. The agency rejected some alternatives as not meeting the Multiple-Use Sustained-Yield Act, yet that Act states wilderness is consistent with its purposes (16 U.S.C. 529). National forest fire records from 1992 to 2024 show ignition density is lowest in roadless and wilderness areas (Aplet et al. 2026).

Recommendation: Keep all 722,000 inventoried roadless acres out of timber emphasis, and recommend wilderness at least at the 2018 level.

5. The timber target is not realistic.

Concern: Alternative 2 projects 377 million board feet a year. The Wallowa-Whitman has not sold more than 53

million board feet in any year since 1992, and staffing has been cut. A plan built on output it cannot reach will pressure managers to cut large trees and streamside stands to hit targets.

Recommendation: Set timber objectives from actual capacity and restoration need, as in Alternative 3.

6. Learn from 2019.

Concern: The 2018 plan was withdrawn after objections from more than 300 parties, including state wildlife agencies and Tribes, with conservation objectors citing too few enforceable standards. Reviewers of the 2025 preliminary plan reported that the binding "shall" and "must" language protecting large trees was gone.

Alternative 2 goes further.

Recommendation: Honor treaty rights of the Confederated Tribes of the Umatilla and the Nez Perce Tribe, and write key protections as standards.

Conclusion: The Forest Service's own science supports Alternative 3 with the 1990 standards retained. I ask the agency to select that alternative.

Thank you for considering this comment.