



September 28, 2026

Via USDA.gov

Umatilla National Forest Supervisor's Office
Attn: Blue Mountains Forest Plan Revision
72510 Coyote Road
Pendleton, OR 97801

RE: Draft Environmental Impact Statement (DEIS), Blue Mountains Forest Plan Revision

To Whom it May Concern:

AFRC is a regional trade association whose purpose is to advocate for sustained yield timber harvests on public timberlands throughout the West to enhance forest health and resistance to fire, insects, and disease. We do this by promoting active management to attain productive public forests, protect adjoining private forests, and assure community stability. We work to improve federal and state laws, regulations, policies and decisions regarding access to and management of public forest lands and protection of all forest lands. AFRC represents over 50 forest product businesses and forest landowners throughout the West.

Many of our members have their headquarters, offices, or other operations in communities adjacent to the Blue Mountains National Forests, and the management on these lands ultimately dictates not only the viability of their businesses, but also the economic health of the communities themselves. The state of Oregon's forest sector employs approximately 61,000 Oregonians, with AFRC's membership directly and indirectly constituting a large percentage of those jobs. Rural communities, such as the ones affected by this Revision, are particularly sensitive to the forest product sector in that more than 50% of all manufacturing jobs are in wood manufacturing.

We believe that the Forest Service shares our desire to modernize and improve the effectiveness of the Land Management Plans (LMP) that govern the Blue Mountains National Forests. Much of the substance of Alternative 2, the proposed action, in the DEIS reflects a desire to expand the level of active forest management in a manner that increases timber supply and improves overall

forest health, including the mitigation of wildfire risk. These outcomes are paramount to the health of our National Forests and the long-term viability of our members. These outcomes are also aligned with key components of the Executive Order (EO) on the *Immediate Expansion of American Timber Production* signed on March 1, 2025. The EO, which lays the foundation for the timber and forest management policy goals of the Administration, emphasizes that the production of wood products is critical to our Nation's well-being and that the United States has an abundance of natural resources capable to meet those production needs. The EO also explicitly references onerous Federal policies that impede the Forest Service from effectively contributing forest products to meet these needs, while also mitigating wildfire risk and conserving fish and wildlife habitat.

Many of the plan components in the current LMPs, particularly those that originated from the Eastside Screens, have been prohibitive to effective project implementation and attainment of desired forest conditions. In our written comments in response to the Draft LMP we expressed thoughts and concerns with several of the Plan's Desired Conditions, Standards, Guidelines, and Objectives. We addressed plan components related to connectivity, riparian habitat, forest structural stages, and soils. In general, it appears that the Forest Service considered and incorporated much of this feedback into the DEIS's plan components. We appreciate this consideration and are confident that the modified plan components in Alternative 2, the proposed action, will enable Forest Service land managers to attain desired conditions on the ground to a higher degree than they currently can under the current Plans.

However, we will offer additional thoughts and recommendations on the proposed plan components for Alternative 2. We believe these recommendations will improve attainment of desired conditions, strengthen the delivery of the timber program, and provide clarity and flexibility to Forest Service decision-makers.

Many of these recommendations are based on how Forest Service LMPs, and the plan components within them, affect land management and program deliverables. The past several decades of Plan development and implementation have demonstrated that, in practice, binding Standards are typically comprised of elements that restrict management activities while attainment of deliverables such as timber outputs or hazardous fuels treatment acres are implemented as optional Guidelines or Desired Conditions. In other words: the restrictions are non-negotiable and will happen while the deliverables are entirely negotiable and might happen.

We understand that this paradigm is a function of laws and regulations beyond this plan revision. However, we are asking the Forest Service to consider and reflect on how restrictive standards affect management activities and how deliverables are affected by other plan components. In general, we believe that this paradigm should compel the Forest Service to:

- a) soften the restrictions;
- b) strengthen the plan components that guide program delivery.

Ultimately, we support adoption of Alternative 2 as described in the DEIS, with consideration of additional feedback on proposed Plan Components. The analysis across multiple resource areas concludes that Alternative 2:

- Increases ecological resilience;
- Reduces the risk of high severity fire;
- Creates the most opportunities to attain desired conditions in riparian areas;
- Accelerates the restoration of ecological integrity at a broad scope and scale.

Furthermore, these forest and ecological health objectives are attained to a high degree while also providing an increased output of timber products outlined in the table below.

Annual Probable Timber Sale Quantity (MMBF)			
	Current Plan	Proposed Action	Alternative 3
Malheur	46	163	66
Umatilla	24	76	34
Wallowa-Whitman	38	125	61

Although Probable Timber Sale Quantities (PTSQ) are non-binding and do not represent a firm “target” for the Forest Service, these increased volume projections reflect the direct correlation between ecological integrity and timber harvest in the Blue Mountains National Forests and reemphasize the need for active forest management in eastern Oregon forests.

These increased timber output projections also create an opportunity for expansion and revitalization of the forest products sector in eastern Oregon. Over the past several years, two mills in the region have closed down operations. The closure of Woodgrain’s mill in Pilot Rock and Malheur Lumber in John Day caused the loss of over 130 jobs. This level of job loss in small communities with populations of approximately 1,500 is significant. Revised LMPs with higher projected timber outputs on these three National Forests could compel new investments in the forest products sector that would help restore socio-economic vitality in these small rural communities.

Forest Products

We urge the Forest Service to modify plan components related to the timber and forest products

program to strengthen the relevancy of the PTSQs. Although the PTSQs are non-binding, the plan components can be designed to elevate their importance. The first Desired Condition for Forest Products reads as follows:

FW-FORPROD-DC-01: Land classified as suitable for timber production has a regularly scheduled timber harvest program that provides social and economic benefits while contributing to ecosystem health and sustainability.

We recommend modifying this Desired Condition to clarify and strengthen the forest products program:

FW-FORPROD-DC-01: Land classified as suitable for timber production has a regularly scheduled timber harvest program that provides social and economic benefits while contributing to ecosystem health and sustainability. **This program should be based on the principles of long-term sustained yield and designed to strive toward the projected PTSQs.**

We believe that timber salvage following disturbance is a critical component of a sustainable timber management program. Salvage is also a silvicultural tool to meet desired forest conditions and improve resilience to future disturbance. As such, the revised LMPs should encourage timber salvage to meet forest structural objectives. The following Desired Condition related to salvage is included in the plan components:

FW-FORPROD-DC-05: Where compatible with ecological desired conditions, salvage harvest is used to supplement the regularly scheduled timber harvest program and recover the economic value of dead and dying trees following disturbance events.

Similar to our recommendations to the previous plan component, we think this Desired Condition could be clarified and strengthened.

FW-FORPROD-DC-05: ~~Where compatible with ecological desired conditions,~~ Salvage harvest is **encouraged on the suitable timber base** to supplement the regularly scheduled timber harvest program and recover the economic value of dead and dying trees **and mitigate hazardous fuel loadings** following disturbance events. **Ensure that salvage treatments align with ecological desired conditions.**

Finally, we urge the Forest Service to supplement Desired Conditions for the General Forest Management Area (GENFOR) to include timber management considerations. There are only two Desired Conditions included under the GENFOR MA.

MA4-GENFOR-DC-01: General forest contributes to the variety of native plant communities and the composition, structure, and patterns defined in the forest-wide desired conditions. While the landscape is predominantly natural in appearance, there are some locations where the vegetation composition, structure, density or pattern is altered to meet short- or long-term management objectives that move the landscape towards the forest-wide desired conditions. The area is maintained through ecological processes, as well as management activities that provide important economic benefits to communities. This management area contributes important habitat for aquatic, plant and wildlife species that benefit from functional habitat.

MA4-GENFOR-DC-02: The management area supplies a variety of dispersed or developed summer and winter recreational activities. Recreational use in MA4 is generally dispersed or located at minimally developed recreation sites (See FW-RECDIS introduction). Facilities (whether Forest Service or permitted) are those necessary to provide public or resource benefit or provide for safety and are typically at lower development scales.

We propose an additional Desired Condition related to timber management:

MA4-GENFOR-DC-03: The Management area supplies a sustainable supply of timber products to support local economies and the nation's demand for wood products. A regularly scheduled timber plan, based on the principles of long-term sustained yield, is developed on the General Forest MA to attain projected PTSQs.

Forest Structural Stages

The DEIS includes Desired Conditions (described in terms of acreage) for multiple forest structural stages ranging from early seral to late seral. We support using structural stages, as defined by Natural Range of Variability (NRV), to guide Desired Conditions. Management guided by the need to have a balance of forest age classes and structural stages should provide for a range of habitat needs as well as a sustainable supply of timber products.

However, in our Draft LMP comments, we questioned the rationale for establishing plan components designed to ensure attainment of *a single* structural stage: late seral. We specifically criticized the proposal to retain the “21-inch rule” from the Eastside Screens as well as inclusion of new age restrictions. We’re pleased to see that the antiquated diameter limits have been omitted in Alternative 2, yet we remain perplexed why the proposed plan components are still limited to the development of late seral habitat while ignoring all other structural stages.

We are now restating our concerns and requests that the DEIS be modified to include Desired Conditions, guidelines, standards, and objectives for other structural stages. For example, FW-FOR-OLD-DC-03 for “old forests” describes that “young forest stands are continually growing into old forest stands, which allows for the transition to old forest across the landscape.”

However, there are no Desired Conditions that outline a process for the “transition to young forests” or the “transition to middle-aged forests.” What action does a forest manager take if they determine that there is deficiency of young forest in their NRV assessment? Do they harvest an old stand to create a young stand? Do they harvest a middle-aged stand to create a young stand? As the DEIS is written, there are no plan components to guide these types of decisions.

We urge you to reconsider the proposed plan components regarding forest structural stages to determine if they, as currently proposed in Alternative 2, adequately address the entire NRV. We believe the final LMP must either remove the Plan Components for “old forest” or supplement them as currently written with corresponding plan components for the other forest structural stages across the NRV.

Soils

Logging system technology is constantly advancing and modernizing to adapt to the operational challenges of treating the complex landscape in eastern Oregon while mitigating impacts to sensitive resources such as soils. Therefore, we believe that plan components should be flexible and adaptable to these ongoing modernizations. Creating firm standards today will hamper the Forest Service’s ability to permit the use of new equipment in future years.

The Draft LMP included the following guideline related to soils:

FW-SOIL-GDL-01: To reduce detrimental impacts to soil productivity and function, all ground based mechanical equipment should not operate on sustained steeper slopes. Based on site specific analysis of soil, slope, and equipment, a higher or lower slope limitation may be authorized. Exceptions to this may include equipment designed for steep slopes that are determined appropriate to maintain soil function.

We commented previously requesting the guideline be modified to create more flexibility to utilize emerging logging technology such as tethered assist. We are pleased to see this guideline rewritten in the DEIS as follows:

FW-SOIL-GDL-01: To reduce detrimental impacts to soil productivity and function, all

ground based mechanical equipment should operate on slopes for which they are designed. To maintain soil function, activities on slopes on greater than 35 percent are to be based on site-specific analysis of soil, landforms, and equipment, such as tethered or cable assist systems designed for steep slopes.

We appreciate this new language that allows the Forest Service to tailor logging plans to site-specific analyses rather than being tied to firm limitations. We also appreciate that the Guideline is written in a way that allows logging equipment to be utilized based on its capabilities rather than on arbitrary specifications. Treating steeper portions of the landscape will become increasingly difficult as cable yarder equipment becomes more scarce in eastern Oregon. Flexible and adaptable guidelines to expand the use of tethered and ground-based equipment, while ensuring the protection of soil resources, are critically needed to attain desired forest conditions across the landscape.

Riparian Management

Active forest management in designated riparian areas should be encouraged to attain desired forest conditions. Portions of these “areas” are often comprised of ecological conditions that resemble uplands due to the extent of Riparian Management Areas (RMA) on both perennial and intermittent streams and therefore should be treated similarly to the uplands outside of the RMAs. The analysis indicates that Alternative 2 provides the greatest opportunity for desired condition achievement in RMAs whereas standards in Alternative 3 would slow or prevent achievement of desired conditions.

In general, the plan components for Alternative 2 in the DEIS support active management, including timber harvest. However, we believe that these components could be strengthened to provide land managers with the discretion and flexibility to make site-specific decisions on managing these RMAs.

Silvicultural treatments, including timber harvest, are referenced on a few occasions:

MA3A-RMA OBJ-01: Maintain or restore riparian management area vegetation conditions through active management, such as planting, seeding, silvicultural thinning, use of fire, changes to livestock management, or invasives species removal.

MA3A-RMA-MAPR-02: To support long-term riparian function, consider silvicultural practices and timber harvest that reduce fuel loading and fire risk.

We recommend that the language in MAPR-02 be modified to broaden the objectives that would warrant silvicultural practices beyond fuel loading and fire risk reduction. Inclusion of objectives such as forest health improvement, insect and disease mitigation, and enhancement of species and structural diversity would enable land managers to prescribe treatments with more flexibility.

MA3A-RMA-MAPR-02: To support long-term riparian function, consider silvicultural practices and timber harvest that reduce fuel loading and fire risk, **improve forest health by mitigating insect and disease infestations, and enhance species and structural diversity.**

Furthermore, the first section of the introduction to MA 3A in Alternative 3 could be beneficial to include in the introduction in Alternative 2. It states that “riparian areas are not intended to be “no touch zones.”” **This is an important clarification to make as active management in RMAs is routinely critiqued and challenged.**

Forest Openings

While we understand that the National Forest Management Act includes a requirement to establish maximum size limits for certain cutting areas, we remain confused why the Forest Service is maintaining the 40-acre size limitation on forest openings. FW-FORPROD-STD-06 incorporates this size limitation and requires a 60-day public notice and regional forester approval if this limitation is to be exceeded.

First, it should be noted that the Forest Service’s new organizational structure removes Regions and replaces them with State Directors. References to regional foresters in the DEIS should be reassessed.

Second, it’s unclear to us what the source for the 40-acre limitation is. If there is scientific evidence to support this acreage size, please highlight it in the Final EIS. If not, please consider increasing this size limitation to increase flexibility for Forest Service land managers and to reduce the occasions where “waivers” or “exceptions” to the standard are desired. Securing those exceptions consumes unnecessary time and resources.

Elk Management

Our Draft LMP comments urged the Forest Service to consider the relevant research on the needs of a healthy elk population in the Blue Mountains. We’re pleased to see the DEIS recognize habitat factors such as forage, cover, and ecological integrity that would benefit the

health, distribution, and nutrition-based habitat of elk on NFS land. Particularly, we are pleased to see that the two action alternatives would provide greater amounts and distribution of improved forage than the current Plans. We strongly believe that there is a positive correlation between timber management and healthy elk populations.

However, we have some concerns with plan components related to elk management. Plan components under FW-SPDIV-DC-06 and FW-SPDIV-MAPR-01 are not measurable and provide little direction and clarity on project-level design. We recommend that these, or other components, be modified in a way that vegetation management projects can demonstrate compliance. In particular, neither of these plan components address open road density, which is an element in the model that we will address next. AFRC believes that active forest management is reliant on a well-maintained road network that provides access to NFS lands, particularly those in the timber land base. However, it would be helpful to the individual Forests to have some guidance on how that road network affects elk security.

Secondly, the DEIS references a “habitat effectiveness index” model (HEI) that guides elk management. The HEI model was developed in 1988 and is outdated by relying too heavily on cover while minimizing security. Modern elk science¹² has shifted more importance on security, which is a function of patch size and distance from open motorized routes, not canopy density. Placing an overemphasis on cover will conflict with density reduction and wildfire mitigation objectives. Under a cover-based model, meeting elk habitat will equate to leaving dense stands un-thinned and at risk of severe wildfire and insect and disease infestations. Under a security-based model, elk outcomes would be in harmony with density reduction and wildfire mitigation objectives.

Please consider modifying these plan components and reassessing the use of the HEI model, considering the best available science on elk.

Wildland Fire

We are concerned with language in the DEIS regarding the utilization of wildland fire as a tool to accomplish certain “desired conditions” across the Blue Mountains. This is a departure from your current forest plan which emphasizes a full-suppression strategy when managing unplanned ignitions outside of wilderness areas. We agree with your assessment that much of the decline in forest health across the planning area can be attributed to a departure from the region’s historic

¹ Michael J. Wisdom, et al. Elk responses to trail-based recreation on public forests. *Forest Ecology and Management*. Volume 411, 2018. Available at: <https://doi.org/10.1016/j.foreco.2018.01.032>.

² Spitz, D. B., et al. 2019. Behavioral changes and nutritional consequences to elk (*Cervus canadensis*) avoiding perceived risk from human hunters. *Ecosphere* 10(9):e02864. Available at: <https://doi.org/10.1002/ecs2.2864>

fire regime and subsequent lack of active management, which has promoted an abundance of shade-tolerant species to persist at a density well outside of the landscape's historic range of variation. We also agree that the desired condition for this landscape should "support fire frequency, size, and severity characteristics of the natural fire regime."

Unfortunately, for reasons identified throughout this DEIS, this landscape is not currently suited to experiencing wildland fire without significant damage to soil, water, and forest resources. While the "big box" method of allowing wildfires to persist on the landscape to accomplish desired resource benefits has been successful at times, we have also seen instances where managed wildfires escape containment, grow exponentially, and cause unwanted destruction in a landscape which is largely unprepared for fire during the hottest and driest months of the year.

From AFRC's perspective, the most appropriate path to reach this desired condition should be a robust program of active fuels management via commercial and noncommercial methods followed by prescribed fire and coupled with a full-suppression response to unplanned ignitions during the fire season.

At present, this landscape is too far departed from its historic range of variation to safely receive fire during the fire season. This DEIS should emphasize full suppression for all unplanned ignitions until the first decade of this new plan can be implemented, after which it would be appropriate to reassess this strategy and consider managing wildland fires for resource benefit where treatments have been successfully implemented.

Conclusion

Thank you for the opportunity to comment on the DEIS. We urge the planning team to consider our input as you develop the Final EIS. We're confident that, through adoption of the proposed action, forest conditions, community stability and vitality, and wildfire resiliency will be improved.

Sincerely,



Andy Geissler
Director of Forest Policy and Monitoring
American Forest Resource Council