



Initial Analysis of Blue Mountains Forest Plan Revisions Draft Environmental Impact Statement

Following directives from the Trump Administration, the Forest Service has proposed an extensive rollback of almost all enforceable ecological protections and a dramatic increase in commercial logging and road-building across Northeast Oregon's and Southeast Washington's Blue Mountains, including nearly 5 million acres of public forest lands. The proposal removes limits on cutting the largest remaining trees, which constitute just [3% of the trees](#) across this area but store 42% of its above-ground carbon.

The proposal also removes road density limits throughout the three national forests and presumes removal of protections for 721,000 acres of roadless areas, despite the vital importance of low road density for salmon, elk, and other wildlife, and [recently published science](#) reiterating the importance of unroaded areas for ecosystem integrity.

This proposal for the Blue Mountains is designed to carry out [Trump's Executive Order](#) to fully exploit our forests for maximum timber production, as well as this administration's [planned rescission of the Roadless Rule](#), and represents yet another example of Trump's ongoing attacks on our public lands.

The Trump Administration's Blue Mountains proposal would:

- **Triple** commercial logging output from current levels
- Eliminate the 21-inch rule that protects large old trees
- Reduce protection for riparian areas to allow more logging and grazing
- Eliminate road density limits that help ensure elk security habitat
- Eliminate protections for 721,000 acres of existing inventoried roadless areas
- Increase "targeted" livestock grazing, an unproven method of fuel reduction with serious adverse effects.
- Reduce eligible Wild and Scenic River miles



Background on the Blue Mountains Forest Plans

The Malheur, Umatilla, and Wallowa-Whitman National Forests (together, the Blue Mountains) contain one-third of all the inventoried roadless areas in Oregon and are home to some of our most spectacular landscapes, including the Eagle Cap Wilderness, the Strawberry Mountains, and the Elkhorn Crest. Outside these special places, however, they are among the most heavily-roaded and heavily-grazed national forest units.

As concerns grew about the impacts of logging, road-building, and grazing on fish and wildlife and other values in the 1980s and 1990s, the Forest Service developed and ultimately adopted protections for large old trees and streams through regional plan amendments called the Eastside Screens and the Pacific Anadromous Fish Strategy (“PACFISH”) and Inland Native Fish Strategy (“INFISH”). In 2001, the Forest Service also adopted the Roadless Area Conservation Rule (“Roadless Rule”) to prohibit road construction in inventoried roadless areas and limit tree cutting within these areas to genuine wildfire risk reduction efforts.

Eastside Screens

Due to the long history of “high-grading” and clearcutting within Eastern Oregon’s older forest stands, which left relatively few large old trees across the landscape despite their important ecological and wildlife habitat values, in 1994 the Forest Service developed the Eastside Screens. Under the Eastside Screens, the Forest Service must retain trees 21 inches or greater in diameter (the “21-inch rule”), as well as move forest conditions toward “late and old structure,” retain and recruit snags, and maintain and enhance connectivity between older forest stands.

In January of 2021, just before the end of the first Trump Administration, the Forest Service moved to rescind the Eastside Screens and replace them with much weaker guidelines that would not offer enforceable protections for large old trees. Oregon Wild and its partners successfully halted this unlawful maneuver through litigation, with Oregon’s federal court definitively ruling in our favor in 2024.

PACFISH and INFISH

The Forest Service adopted the PACFISH and INFISH strategies in 1995 to ensure the protection of riparian areas and streams that support fish, including runs listed under the Endangered Species Act (ESA), and to avoid additional listings. PACFISH applies to anadromous fish runs, like Chinook and coho salmon, while INFISH applies to streams with resident fish that do not migrate to the ocean, such as redband trout and bull trout. Both PACFISH and INFISH prohibit logging in riparian areas except to address “catastrophic events” or “where needed to attain Riparian Management Objectives.” However, logging under these exceptions must not retard attainment of Riparian Management Objectives or adversely affect



ESA-listed fish. These policies also prohibited livestock grazing in riparian areas if it would retard attainment of aquatic objectives.

Blue Mountains Forest Plan Revisions - Alternatives Considered

- **Alternative 1 (No Action):**
 - Retains current Eastside Screens, PACFISH/INFISH, road density limits to provide elk secure habitat, and Roadless Rule protections

- **Alternative 2 (Proposed Action):**
 - More than *triples* logging from current levels
 - Eliminates the Eastside Screens, allowing logging of mature and old-growth trees almost everywhere except in designated wilderness
 - Eliminates PACFISH/INFISH, opening riparian areas to extensive logging
 - Eliminates road density limits that currently help provide elk security habitat
 - Presumes the rescission of the Roadless Rule, eliminating protections for 721,000 acres
 - Shifts most roadless acres into the “General Forest” management category (i.e., open to commercial logging)
 - Lays the groundwork to authorize new road-building and commercial logging in mature and old-growth forests and riparian areas under the guise of fuel reduction
 - Recommends no new wilderness
 - Increases “targeted” livestock grazing

- **Alternative 3:**
 - Eliminates Eastside Screens and PACFISH/INFISH but creates new large tree and riparian guidelines
 - Presumes the continuation of Roadless Rule protections
 - Recommends 35,000 acres of new wilderness
 - More modestly increases logging from current levels



Additional Aspects of the Proposed Action (Alternative 2)

The Forest Service's proposed Alternative 2 emphasizes aspirational "desired conditions" and "objectives" and flexible "guidelines," with very few enforceable standards, and no standards for large tree retention, snag retention, tree cutting in riparian areas, or protection of scenic values. Alternative 2 results in a net loss of eligible Wild and Scenic River miles (4 miles added in Malheur National Forest and 15 miles removed in Wallowa-Whitman National Forest). The proposed alternative's timber harvest goals also vastly exceed fuel treatment objectives, indicating the proposed tripling of logging is not designed to address wildfire risk but merely to maximize commercial timber volume.

Species of Conservation Concern

Under the current forest plans, Pacific marten, goshawks, and pileated woodpeckers all serve as management indicator species ("MIS"), proxies for other wildlife that depend on dense mature and old-growth forests. The proposed revisions eliminate protection for these species. Instead, the proposal declines to consider goshawks and pileated woodpeckers as potential species of conservation concern ("SCC") for any of the three national forests, while only one retains marten in that role. No other species representative of dense, old forest conditions have been proposed in their place, making it unlikely that logging implemented under these plans will retain sufficient habitat for these relatively rare species to persist across the landscape.

Final Takeaways

At the direction of the Trump Administration, the Forest Service's Blue Mountains proposal expressly aims to adopt a "flexible" active management scheme in order to dramatically increase logging by removing perceived obstacles, including the Eastside Screens, PACFISH and INFISH, road density and roadless area constraints, and protections for old forest indicator species. The Forest Service's proposal avoids enforceable plan standards and species protections that would limit its discretion to cut trees or build roads, instead emphasizing timber volume outputs at the expense of other values.