Comments:
+ The scale of the project is too large to address the impacts of the proposed logging activities
The proposed logging and other mechanical "treatments" cover diverse forest habitats that will each be impacted differently, yet the scale of the proposed project (1,270,000 million acres) does not allow for the Forest Service to adequately describe or analyze site-specific or cumulative impacts. Thus, the public's ability to raise issues by evaluating a detailed proposal is limited. The Forest Service must address this by narrowing the focus of proposed activities.

+ This project must address the oversized road network in the Blue Mountains
A large-scale project is the perfect opportunity to make on-the-ground progress toward an economically and environmentally sustainable road network. If this project truly aims to make our forests more resilient, the agency must address roads' tremendous impacts to water, fish, wildlife, and ecosystems, impacts that are well documented in scientific literature. This project should identify the minimum road system needed and return unneeded, expensive and deteriorating forest roads to the wild.

+ Not all forests need "restoration"
Restoration activities can be appropriate in some dry forests where past logging and fire suppression have shifted open forests to dense forests. However, mid-elevation dry forests and cool, moist, high-elevation forests naturally support high tree densities and fires of moderate to high severity. Here, forest densities have changed little from their pre-suppression-era condition, and therefore mechanical "restoration" is not needed. Many forests targeted by this project are mid- and high-elevation, and/or cool and moist, and should be dropped from the project.

+ High-severity fire is not synonymous with catastrophic fire
High severity fires often have ecological benefits and are the norm in many ecosystems, such as lodgepole pine and spruce-fir forests. While severe fires can be perceived as "catastrophic", severely burned landscapes are neither "destroyed" nor "lifeless" in terms of their ecological integrity.

+ Logging within old growth forests will not increase forest resiliency
The few old growth forests that remain in the Blue Mountains store large amounts of carbon, serve as refugia for sensitive species, have lower rates of non-native species, and help us understand natural ecosystems. The proposed logging in old growth forest should be dropped from the project.

+ Logging large trees is not fuel reduction
Medium and large diameter trees are the backbone of wildfire and climate tolerant landscapes. These fire-resistant trees should be retained, not logged. Any proposed amendments to the Eastside Screens should be dropped from the proposal.

+ The impacts of temporary road construction are not temporary
The public often continues to use "temporary" roads long after they have been declared to be in state of non-use. As a result, soil compaction/disturbance and sedimentation impacts persist, as well as impacts to wildlife. The forest service should drop all temporary road construction from this project proposal.

+ Roadless wildlands should not be logged
Intact roadless habitats maintain species diversity, sequester carbon, protect watersheds, and provide non-fragmented habitat for numerous threatened and endangered species. This project proposes to carve temporary roads and bring mechanical equipment into these rare roadless areas, including the 5,570 acres Tiger Creek Roadless Area in the northern Blue Mountains on the Oregon and Washington border. This area has been identified as vacant bighorn sheep habitat and a site for future herds. Deer and elk winter at the lower elevations and calve at the higher elevations. The area also provides excellent aquatic habitat for native bull and rainbow trout, with cold and clear water flowing though its rivers year round. The proposed activities within this and other roadless areas will cause irreparable harm and should be dropped from the project proposal.

Do your job-Protect Our lands, waters, wildlife, future & health! You work for citizens, Not industry! Your attention to this most urgent matter would be much appreciated by all present & future generations of all species.

Thank you
Lydia Garvey Public Health Nurse