

Date submitted (UTC): 3/21/2016 12:00:00 AM

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To the Blue Mountains Restoration Strategy Team Lead,

I'm writing in opposition to the Blue Mountains Forest Resiliency Project and to the goal of further accelerating the scale and pace of logging (aka "thinning") under the guise of restoration. More logging does not create the wild habitat needed for animal and plant species to grow. Natural disturbance is completely different from the invasive tactics being proposed. This is devastating over-management.

The Project scoping letter fails to disclose and address significant scientific controversy over key assumptions fundamental to the project proposal. The project proposal also fails to use the full range of best available current science in designing the project. The Forest Service needs to incorporate new scientific evidence into its project planning. The assumptions about fire regimes are no longer accurate and treatments must be prescribed individually rather than in blanket formulas.

Given the trend of many such fuel reduction/fire reduction projects reducing forest density in naturally dense areas needed by adapted wildlife species across these three Forests, we can't trust the Forest Service not to do the same with this project-on a much larger scale, all at once. Do not destroy the habitat of protected species such as the Pileated woodpecker, American marten, Blackbacked woodpecker, American Three-toed woodpecker, Northern goshawk, Cooper's hawk, and Sharp-shinned hawk, which represent the habitat needs of many other species. Such extensive forest density reduction would also degrade or eliminate suitable habitat for other density-related species such as Northern Pygmy owl, and for at least one Candidate species for uplisting, Pacific fisher. These species need large live trees, snags and downed logs, which would be removed according to this plan. Do not take more of their habitat away. You will threaten their lives.

The studies of historical forest conditions the Forest Service has been using "to help inform natural ranges of variation" are often old and out-dated or based on models with no pre-European colonization baseline data, so not necessarily accurate. You need to take past logging into consideration. These forests have been damaged several times over already. As a reminder, the Forest Service is legally obligated to protect and ensure the viability of Management Indicator species and all native vertebrate species; to prevent uplisting of listed and Sensitive species; to protect water quality; to protect soil integrity; to meet Riparian Management Objectives; but not to prioritize and ensure replication of the historical range of variability or to prevent or reduce wild fire severity or extent.

The Forest Service proposed FRP logging to reduce forest density is not sustainable at the scale and pace proposed. These three National Forests can't be lumped together as the same HRV "averages" regardless of all their unique variation in topography, elevation, and latitude. Removal of stand density and canopy cover should not be a goal in itself or be allowed to drive forest management. When you fragment the forest, you threaten species like Canada lynx, and when you reduce canopy cover you threaten many species including Neotropical migratory songbirds. Therefore it is important not to reduce forest density, canopy closure, and multiple canopy layers where these naturally exist on the landscape. Your treatment sites need to be field verified! Do not apply "one size fits all" treatments!

The Forest Service puts forth contradictory and inconsistent rationales regarding their stated purpose and need for the project and the actual logging proposed. For example, more large trees would be removed by logging despite promises to increase large-tree dominated stands and to maintain existing old forests and increase their abundance over the long-term. Further these same Forest Plan amendments regarding the logging of large trees, old growth areas, and elk and deer cover are being used repetitively across these Forests at an increasing scale and intensity over time, indicating that these are not addressing unique site-specific conditions. These Forest Plan amendments over many timber sale/fuel reduction projects across these Forests are creating a significant and increasing cumulative trend of impacts to wildlife habitat which would be greatly

exacerbated by their large scale application under the FRP.

Logging does not mimic the effects of either low or mixed severity fire as claimed, as it removes biomass and carbon sequestration, based on economic dictates which favor the removal of larger trees, which tend to be the most fire-resistant. Logging at an unsustainable pace and scale, as proposed, does not "enhance" the diversity and quality of wildlife habitat, and does not "restore" tribal treaty "resources" and high social values of traditional uses and culture.

The FRP planned actions are unlikely to prevent or significantly reduce wildfire severity and extent; are unlikely to prevent people's homes and other structures from burning in wildfires as the FRP focuses on the backcountry rather than on more useful structure protection in the immediate area of the structure; but are likely to cause significant harm to these Forests' ecosystem integrity and wildlife biodiversity, as well as to recreational aesthetics, and indigenous peoples' treaty rights and cultural uses.

The analysis for these fuel reduction/timber sales also chronically fails to consider how planning to implement more of the same management activities that caused the current state of the forest (used as a rationale for more logging and roading) would not cause these perceived problems with the forest condition to be exacerbated. Logging, re-opening of closed roads, building of new roads, and use of prescribed fire in forest types adapted to infrequent, high severity wild fire, as well as continued livestock grazing-especially in riparian areas-impair forest resiliency, rather than maintaining and increasing forest resiliency, as the scoping purpose and need and project title promise. Thus foreseeable results on the ground of proposed FRP actions would be inconsistent with the purported purpose and need for the project.

The FRP would perpetuate fire suppression by promoting fire suppression fervor through its stated purpose and need component of increasing "public and firefighter safety in the event of wildfire", even though there is no guarantee that planned actions would actually increase public or firefighter safety. The FRP also aims to perpetuate fire suppression by reducing biomass "fuels" needed for carbon sequestration, wildlife biodiversity, and soil nutrient recycling. If the fuels/fire risk reduction intended actions are actually successful in reducing the incidence or severity of fire, this would deprive wildlife and plant species of the natural disturbance to which they are adapted, which creates their unique habitat niches. This would reduce overall biodiversity in fire-adapted forest ecosystems such as the Blue Mountains Forests.

The FRP proposed actions could actually increase the severity and extent of wildfire by removing more fire-resistant large and mature trees; creating openings for in-growth of denser, more flammable small trees; creating and leaving for years highly flammable logging slash; and opening up stands, which increases wind speeds through the stands, increasing fire intensity. This outcome would be contrary to the stated purpose and need, yet, as with other Forest Service fire/fuel reduction timber sale projects, is not considered in the FRP scoping.

The real goals of the FRP appear to be creating and maintaining more Ponderosa pine plantations, speeding up the already unsustainable pace of logging on an even more extreme scale, and swamping opposition by gutting public process through all this logging being crammed into one EIS and somehow accomplished over only ten years. It is highly questionable whether this scale of logging across three National Forests is legal under NEPA for one EIS and such broad scale and rushed analysis. This is a programmatic EIS under the pretense of site-specific analysis which could not possibly be conducted within the proposed time frame. Further, lumping huge sections of three National Forests together for one analysis appears to circumvent the purpose of individual Forest Plans under the National Forest Management Act (NFMA).

The FRP management actions would cause enormous impacts to these Forests' ecosystems, unprecedented in scale for one project. Viability for Management Indicator species (MIS) could not be ensured, given the unprecedented scale and pace of the project in degrading and eliminating habitat for multiple MIS-especially as there are apparently no recent long range population studies available for these MIS on these Forests to accurately determine their population status, reproductive success rates, and viability thresholds.

The forest condition issues raised by the Forest Service in the FRP scoping document are best addressed, and are being addressed, on a site-specific basis at a slower pace that allows for greater public input and better site-specific planning. As it is, at the current escalated scale and pace of so-called forest "restoration" logging, Forest Service staff are stretched too thin to cover the ground sufficiently. Collaborative groups cannot meaningfully integrate a range of social values and concerns into such a fast paced and large scale plan, and it is clear that the full spectrum of public interest is not meant to be integrated, based on the rushed public process for a combination of comprehensive management actions of this magnitude, across major portions of three National Forests.

The scale and pace proposed for the FRP would make learning from mistakes and adaptive management virtually impossible for the FRP itself, contrary to the Forest Service's disingenuous claim that the project is designed to "learn from project results, and adapt as needed to achieve desired outcomes on the landscape." We are concerned that treaty rights will not be met after the project implementation due to greatly diminished elk and deer herds, cultural artifact and cultural site destruction, and widespread damage to cultural use plants,

as well as degradation of fish habitat.

We are very concerned that the FRP will degrade and alter the status of last undeveloped lands and Potential Wilderness Areas, preventing them from becoming designated Wilderness Areas or achieving other protected status, such as National Monument or National Park status. We are strongly opposed to management of last undeveloped lands and Potential Wilderness Areas, as these are last intact refuges for wildlife outside of designated Wilderness, Inventoried Roadless Areas, and Research Natural Areas. Such areas are also vital for preserving interspersed reference points for study and comparison for adaptive management in other areas. Economic benefits are not supposed to be the primary driving force behind Forest Service management, but appear to be that in the proposed Blue Mountains Forest Resiliency Project. The proposed actions would result in very short-term, limited private profit benefits from unsustainable long-term impacts to indigenous lands/the public commons. Such fast heavy extraction over such a large scale would result in a huge boom/bust shock to local communities, leaving few resources left for these communities to use to provide sustainable jobs into the future.

We contest the assertion that the current pace of active forest logging is not keeping pace with forest growth, when based on our experience in the field, the trees are getting smaller on average due to the already unsustainably fast pace and extensive scale of such logging. Deforestation, which is a leading contributor to climate change, is not just caused by conversion of the land to non-forest by development, but by logging at a pace faster than regrowth of trees the same size as those removed. The FRG would contribute to unsustainable deforestation and thus to climate change.

The Forest Service has yet to demonstrate that their Best Management Practices (BMPs) and Project Design Criteria (PDC) are actually effective or are even fully implemented. This gives us no reason to support a massive scale fast timber sale project over three National Forests. A Finding of No Significant Impact for this project cannot be based on the assumed implementation and effectiveness of BMPs and PDC.

We are concerned that the Forest Service expects the public to identify all site-specific concerns during the scoping stage, even though we have no information as to what type of management would happen where in the marked areas of proposed management on the scoping maps, and not enough time to go out and field survey these large areas before scoping or DEIS comments are due. Without more detailed information and analysis it is impossible for the public to respond as to the full range of their site-specific concerns.

Given all of the potential ecological impacts above, and the unsustainable scale and pace of the Blue Mountains Forest Resiliency Project, we strongly oppose the Blue Mountains Forest Resiliency Project in its entirety.

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