Re: Comments to scoping for The Blue Mountains Resiliency Project (BMRP)

Dear Blue Mountains Restoration Strategy Team Lead

The BMRP proposes to implement massive vegetative treatments within the Wallowa-Whitman, Umatilla and Ochoco National Forest of Eastern Oregon, in response to the poor conditions our public lands are in due to the mismanagement by US Forest Service Supervisors Offices in Baker, Pendleton and Prineville. FAFA stands in support of such treatments to reduce fuel loads on the landscape, however we are very aware as to how such projects are used to manipulate public support for such treatments and then have the projects become road decommissioning and motorized access restrictions to the local communities.

FAFA does not support any actions that close, decommission or obliterate roads, or that restrict motorized access to the mountains of Eastern Oregon. The roads that are currently in place have a long history of serving as management infrastructure for land stewardship, and are vital routes for our local communities and residents to access the resources they need to sustain their families. The scoping letter does not sufficiently supply the necessary information as to roads that existed prior to October of 1976 per the RS2477 law which protected those public domain access points for the general citizenry. Until such time as the “currently closed roads” that are being claimed by the agency are identified, and the year each road that is planned to be reclosed, decommissioned or obliterated no residents can give a substantive comment on the proposed work.

Items FAFA is commenting on -

1. There is no delineation of which roads are currently identified as “closed.” Roads identified as “currently closed” should be mapped, and displayed for public comment during the scoping period so that an accurate assessment of current road uses by the public are identified so the public knows which roads are targeted for closure. Roads identified as “currently closed” need to be identified for all three forest in the project proposal area.

2. Define "improve existing road networks." Does that mean fixing roads to minimize impacts, or does it mean decommissioning roads that will negatively impact the local residents and communities.

3. There is no definition found for each of these "connected actions" - 1) system road reconstruction, 2) road maintenance, or 3) re-closure of roads opened to implement treatments (this goes back to item 1). Roads stated as "currently closed" need to be presented to the public in scoping to allow them to comment on the current status of the roads and if they are actually not used, and if they need to stay open for future use.
4. No list of potential best management practices and design criteria are presented in the scoping letter for the public to comment on potential treatments and impacts to their livelihood and families.

5. FAFA supports the statement on Page 9 of the scoping letter with reservation, “maintaining current road densities.” The scoping letter does not adequately delineate what roads are currently identified as closed or open on each forest so we cannot give an adequate comment to the scoping letter as presented. We do not currently know the “current road densities” on each forest, and would need to know that before we could completely support the statement.

Respectfully,

Tork Ballard
President - Forest Access For All
PO Box 48
Baker City, Oregon 97817