We reject the goal of further accelerating the scale and pace of logging (aka "thinning") under the guise of restoration. 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. 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.

This degradation and elimination of needed habitat structure would be compounded for species requiring large live trees, snags, and down logs, as large trees are evidently being planned for removal, based on the proposed Forest Plan amendments. The shock to these species' populations of so much habitat being degraded or eliminated at once over ten years (plus other, similar ongoing and planned fuel reduction/timber sale projects) could be enough to cause local population extirpations.

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.

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.

Density and higher canopy closure elimination directly degrades and eliminates habitat for many species adapted to these conditions, including Management Indicator species such as Pileated woodpecker, Blackbacked woodpecker, American Three-toed woodpecker, Northern goshawk, Cooper's hawk, and American marten; and Pacific fisher, a Candidate for uplisting.

It is important not to reduce forest density, canopy closure, and multiple canopy layers where these naturally exist on the landscape. However the scale and pace of the FRP means that these large areas slated for management will not be adequately field verified as to their conditions and that planned density reduction will likely occur as a blanket, “one size fits all” application, significantly reducing or degrading suitable habitat for the many native species dependent on variability across the landscape.

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. The Forest Service can't have it both ways, claiming to be basing the FRP purpose and need on Forest Plan direction, yet planning to use Forest Plan amendments to violate key Forest Plan standards.
Evidently the Forest Service is specifically planning to violate Forest Plan standards prohibiting: the logging of large trees over 21” in diameter; the commercial logging of designated old growth forest areas; logging reduction of elk and deer thermal and hiding cover below forest plan standards; and road density standards intended to protect wildlife security. Obviously these would not be Forest Plan amendments based on site-specific, unique circumstances, as they are already being encouraged on a broad scale in advance of any site-specific analysis and field verification for the proposed management areas.

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. 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. Logging, reopening 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.

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.

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.

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). 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.

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.

We are concerned that treaty rights will not be met after the project implementation 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. 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.

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. Without more detailed information and analysis it is impossible for the public to respond as to the full range of their site-specific concerns. We strongly oppose the Blue Mountains Forest Resiliency Project in its entirety.

Signed,
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