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Comments:

From Marina Richie, April 3, 2016

To Forest Supervisor Tom Montoya:

Thank you for the opportunity to comment on the Blue Mountain Forest Resiliency Project. While the goals of the project sound admirable-- to restore forests to historic conditions that can better withstand wildfire in an age of climate change--I'm concerned about the size and scale of the project, and the intrusion of treatments into old growth forests and into roadless areas like the 5,570-acre Tiger Creek roadless area that has many values, including a critical are for native bull trout --victims of rising temperatures. Their best hope for "resiliency" is to keep their watersheds intact and waters running cold, clear and connected--logging does the opposite.

I question a one size fits all approach being proposed for ecosystems that are extremely diverse. The massive project --- at almost 1.3 million acres-- includes forests with a variety of fire cycles, as well as natural high density (as in the mixed fir, moister forests) and significant old growth forests that are havens for wildlife. I'm also worried about the impacts of roads, even if temporary, and of the omission of the need to close many roads now in a planned, thoughtful way as part of true "resiliency." The plan even calls for building temporary roads. There's simply no excuse for adding roads anywhere when the need is so high for removing and restoring thousands of miles of roads that contribute to erosion and sedimentation in precious streams.

That is the real question. What is it to make a forest resilient in the age of climate change? If that's the goal, we have to first acknowledge the importance of keeping our watersheds as intact as possible and not de-stablizing them through logging. Our best hope as we lose snowpack earlier each year is to have our forests shade and keep waters cool, and for roots to hold the streams. How do we do that? We stay OUT of our old growth, unlogged, and roadless areas that are doing their natural best to stay resilient in the face of climate change.

Second, we must acknowledge the limitations of our knowledge on the best actions to take. To conserve means to act conservatively--and do no harm. That's impossible in a project of this size and scale. In contrast, I believe scientists working closely with the Forest Service have succeeded in a model project: Glaze Forest Restoration Project on the Deschutes National Forest. The results of restoring a parklike ponderosa pine forest with pockets of density and flourishing aspen look beautiful, but the approach was far different from what is being proposed in the Blue Mountains. Resilience and restoration came from field participation of forest scientists, wildlife biologists, conservationists, and timber industry folks. It took on the ground marking of trees and closely checking and monitoring. The effort there did provide some commercial timber, but did not remove the bigger trees, and the number one goal was restoration--commercial benefits were secondary.

However, when you take thousands of acres on multiple fronts adding up to over a million, there's no way to achieve a thoughtful resilient forest project that's mimicking historic conditions, helping wildlife thrive, and keeping our big trees and old growth forests. The project needs to be scaled back significantly.

I believe this project could go forward in a much much smaller way and with significant changes--starting with a first and clear premise that resiliency is truly responding to best science and is not about upping timber cuts and logging commercial size trees to feed mills and respond to local pressure upon our public national forests.

Second, focus on the urban interface and in forests that are already logged. The only unlogged forests that make sense for restoration are those that have the large parklike ponderosa pines and some larches, where ladder fuels are endangering their future. Those are the forests that used to have the frequent, low severity fires. When focusing on those forests, the thinning should leave every old growth tree--that goes beyond diameter to aging trees (some old growth is smaller than 20 inches, because of growing conditions).

For an excellent resource that should be applied to the project (and includes the Glaze case study), see: [http://www.oregonwild.org/sites/default/files/pdf-files/Eastside\\_Restoration\\_Handbook.pdf](http://www.oregonwild.org/sites/default/files/pdf-files/Eastside_Restoration_Handbook.pdf)

When it comes to the mid-elevation and higher elevation forests that contain naturally denser forests and wetter conditions, simply stay out of these unlogged forests altogether. The project includes many of these sites and they should be dropped. Instead, some of those mid and higher elevations, as in the Umatilla NF, contain plantations on former clearcuts. Those are problematic and pose fire hazards and the focus there makes sense. Going into the unlogged forests of mixed fir does not. Nature has a way better handle on resiliency there.

Our fear of wildland fires also has led to misperceptions about what is "natural" in the Blue Mountains of northeast Oregon. Naturally, some forest types-like lodgepole-have thousands of years of dynamic forest history of high severity fire. Wildlife-from black-backed woodpeckers to elk-benefit and have evolved with high severity fire.

If the aim is to help shore up our forests better to be closer to historic conditions in an era of hotter temperatures and more wildfire, then we have to honor the multiple kinds of fire ecosystems-from low to mid to high severity. The Forest Service has an opportunity to be educational leaders too-letting the public know about fire ecology, the evolution of wildlife that's adapted to fire and that the aftermath of fires has a lot of potential for life-in the snags that supply insects to birds, carbon to soils; and in the way fires skip over parts of the landscape often in a mosaic-leaving patches of green. There's so much people need to understand to curb fear and to build more support and understanding about living in a fire-sculpted landscape. When we go in and "salvage" the "useless" and "dead" trees after a fire, we are not salvaging, but intruding upon a living, growing and fragile ecosystem where our heavy machinery and cutting of important burned trees harms and leaves the land even more vulnerable to the effects of climate change.

As someone who especially cherishes Hells Canyon National Recreation Area-the place where I wrote my master's thesis in journalism-I also want to see the HCNRA honored and treated very differently-not as just one other place in the Blue Mountains. The guiding plan and mission needs to be honored and specifically addressed there. After seeing logging on the Pederson timber sale by P.O. Saddle that was supposedly to address fire and insects, I know firsthand that clearcut logging occurred in a green unlogged forest and damaged meadows and added scarring logging skidroads. "Hazard" trees removed in the Indian Creek Campground area were cut far from campsites and included big, beautiful important wildlife trees. Given what I've seen, I'm concerned that project areas in this plan are within HCNRA and would want more time to look at the areas and the potential impacts.

In summary, I suggest the Forest Service go back to the drawing board and come back with a severely scaled down proposal that honors the specificity of our many ecosystems and prioritizes the areas of high public concern-the urban wildland interface. Stay out of all roadless areas. Don't cut any of our ancient forests (a better term than "old growth"). Don't build another road and come back with a proposal that closes, rehabilitates and restores the damaging network of old roads that make our forests less resilient and our watersheds at risk.

Thank you for the opportunity to comment,  
Marina Richie