

Date submitted (UTC): 4/1/2016 12:00:00 AM

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Comments:

This is odd, because the few plan amendments that have been approved to allow removal of large trees, were to protect large and valuable habitat trees, NOT to create openings. This is a novel purpose for removing large trees.

The most relevant guidance is Regional Forester Linda Goodman's June 11, 2003 memo to eastside Forest Supervisors giving forests a cautionary green light to consider amendments to the 21" diameter limit in the Eastside Screens under certain circumstances. The NEPA analysis needs to provide a clear explanation of how this project meets the requirements of the 2003 guidance memo which says -

"science findings ... reinforce the importance of retaining and recruiting large, old trees in the eastside landscape. ... The objective of increasing the number of large trees and LOS stands on the landscape remains. ... I encourage you to coordinate with the Regional screens team and Regional planning staff as site-specific Forest Plan amendments are developed."

The memo does not recommend changing the underlying restoration goal of the screens, but rather "to consider site-specific Forest plan amendments where this will better meet LOS objectives by moving the landscape towards HRV, and providing LOS for the habitat needs of associated wildlife species." The Regional Forest expects amendments to be site-specific, not across more than 1 million acres. The Regional Forest expects amendments to better meet LOS objectives and provide LOS habitat. Creating openings is not meeting LOS objectives or providing LOS habitat.

We will address this in our scoping comments.

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On Thu, Mar 31, 2016 at 6:46 PM, FS-r6restorationprojects <r6restorationprojects@fs.fed.us> wrote:  
Hi Doug

The Proposed Action mentions that the Forest Plans may need to be amended to remove trees >21" dbh, if necessary to achieve the purpose and need. After scoping, the responsible officials will decide if the range of alternatives will include the cutting of trees >21" dbh, where necessary.

Thanks  
ayn

Ayn J. Shlisky, PhD  
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Caring for the land and serving people

From: dh.oregonwild@gmail.com [mailto:dh.oregonwild@gmail.com] On Behalf Of Doug Heiken  
Sent: Tuesday, March 29, 2016 2:38 PM  
To: FS-r6restorationprojects <r6restorationprojects@fs.fed.us>  
Subject: removing large trees to create openings

The Blue Mtn Resiliency Project scoping notice in the Federal Register says:  
Opening-through mixed severity fire or mechanical treatments, removes a major proportion of medium and large trees (>20? dbh) to create openings, or canopy gaps of early seral structure and composition.

Is this a typographical error? Is the FS really proposing to mechanically remove "large trees (>20" dbh)"?

Sincerely,  
/s/

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