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April 4, 2016

Blue Mountains Restoration Strategy Team
72510 Coyote Rd
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Subject: Blue Mountain Forest Resiliency Project

Dear Blue Mountains Restoration Strategy Team

Attached are our comments on the Blue Mountain Forest Resiliency Project. Please include these comments in the official record for this project.

We have numerous concerns but will focus on our top four concerns. We are concerned about the affects this proposed project would have on the open road/route density; elk security habitat; aquatic habitats for redband trout population densities and amphibians; and the cumulative effects that this project will have with all past, present and reasonable foreseeable projects.

The Blue Mountain Forests have a current Travel Management Plan implementing, managing and enforcing travel management. Our concern with this large landscape project would be the amount of open roads created with project implementation. With declining transportation dollars, the Forests do not have the funding or the capacity to take on additional roads. The effect of roads/routes on wildlife and their habitats, aquatic species and their habitats, compaction, sedimentation and a host of other resources will be huge. We recommend a thorough analysis of road/route effects to all natural resources.

Elk security habitat is defined in literature as forest habitat blocks greater than 250 acres in size and greater than ? miles from a road/route. Our concern with the proposed actions of this large landscape project is that elk security habitat will be compromised due to construction and reconstruction of many close and decommissioned roads across all the Blue Mountain Forests. Additionally, both commercial and non-commercial thinning, and fire treatments on the scale proposed will significantly eliminate effective elk security habitat. We suggest an in depth analysis using the latest scientific models to clearly describe the project affects (roads, noise and cover) to elk and other big game.

Redband trout and Oregon spotted frog are on the Region 6 Regional Forster sensitive species list. Both species occupy habitats located in the Blue Mountain Forests. Our concern regarding this large landscape project is the effects of all the treatments on sedimentation and habitat of all Class I - IV streams, springs, seeps and other special habitats. Both species are particularly sensitive to any further habitat degradation that may be caused by this project. We recommend an in depth analysis of current population and habitat trends and how this project may affect them.

The Blue Mountain Forest Resiliency Project cumulative effects analysis for past, present and reasonably foreseeable projects will be critical due to the landscape scope of this project. Each Forest has numerous projects in the pipeline that must be detailed in this project cumulative effects analysis for all natural resources.

Thank You for the opportunity to comment on this project.

Mike Gerdes - Retired ODFW and USFS Wildlife Biologist

Amy Stuart - Retired ODFW Fish Biologist