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Comments:

We reject the goal of further accelerating the scale and pace of logging (aka "thinning") under the guise of restoration. The Blue Mountains forests evolved with natural disturbances, including the full range of severities of wild fire, insects, and disease. These natural disturbances should be allowed to function to provide habitat niches for wildlife species that evolved with them. The Forest Service's Blue Mountains Forest "Resiliency" Project (FRP) focuses on trying to reduce or prevent these natural disturbances, while accelerating the scale and pace of ecological forest destruction through over-management across 610,000 acres. 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 scale and pace proposed for the FRP would make learning from mistakes and adaptive management virtually impossible.

The FRP project proposal fails to use the full range of best available current science in designing the project. There is an increasingly large body of science contesting historical range of variability assumptions regarding historic fire regimes, historic forest density, and historic abundance of smaller trees, including historic photographs coming to light showing dense forest structure intermixed with large Ponderosa pines. The Forest Service is ignoring numerous scientific studies and historical documents that point to historically and naturally dense forests that experienced infrequent high-intensity fires.

Forest density reductions degrade and destroy habitat for many species adapted to these conditions, including Management Indicator Species (MIS) such as Pileated woodpecker, Blackbacked woodpecker; American Three-toes woodpecker; Northern goshawk; Cooper's hawk, and American marten; and Pacific fisher, a Candidate for uplisting. Management indicator species also represent the habitat needs of other species. In addition, many species are threatened by forest fragmentation, such as Canada lynx, and many others are made vulnerable by removal of multiple canopy layers of forest in conversion to single story stands, including Neotropical migratory songbirds. Therefore it is important not to reduce forest density, canopy closure, and multiple canopy layers where these naturally exist on the landscape. The extensive forest density reduction proposed in the FRP would degrade or eliminate suitable habitat for other density-related species such as Northern Pygmy owl, and for at least one Candidate species for uplisting, Pacific Fisher. This degradation and elimination of needed habitat structure would be compounded for species requiring large live trees, snags, and down logs. Significant numbers of down loads and snags would be removed through prescribed burning, hazard tree felling, road re-opening and building, and "fuel" reduction in general. The USFS is also evidently planning to log large trees in the FRP, based on the proposed Forest Plan amendments.

The large quantity of habitat that would be degraded or eliminated at once over ten years could cause local population extirpations and contribute to a trend toward uplisting, or cause uplisting, of these and other species. The viability of many species, including 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 those MIS on these Forests to accurately determine their population status, reproductive success rates, and viability thresholds. The Forest Service is legally obligated to protect and ensure the viability of MIS and all native vertebrate species; to prevent uplisting of listed and Sensitive species; to protect water quality; to protect soil integrity; and to meet Riparian Management Objectives.

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. Based on the scoping letter, everything in the mapped management areas is up for grabs without reference to the stated purpose and need or to the existing forest condition - both closed and open canopy forest, young and old forest (including old growth management areas), large trees, and moist and dry forest types. Further, 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.

More large trees would be removed by logging - - despite promises to increase large-tree dominant stands and to maintain existing old forests and increase their abundance over the long-term. It appears that the Forest Service is specifically planning to violate their own Forest Plan standards, including those 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. Further 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 as claimed, as it removed biomass and carbon sequestration, based on economic dictates which favor the removal of larger trees, which tend to be the most fire-resistant. In addition, the FRP planned actions are unlikely to prevent or significantly reduce wildfire severity and extent. Logging, re-opening 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. 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 of highly flammable logging slash; and opening up stands, which increases wind speeds through the stands, increasing fire intensity.

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. We are also concerned that treaty rights will not be met after the project implementation due to greatly diminished elk and deer herds, cultural artifact and cultural site destruction, and widespread damage to cultural use plants, as well as degradation of fish habitat.

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 FRP would contribute to unsustainable deforestation and thus to climate change.

Given all of the potential ecological impacts above, and the unsustainable scale and pace of the Blue Mountains Forest Resiliency Project, I strongly oppose the Blue Mountains Forest Resiliency Project in its entirety.