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March 31, 2016

Blue Mountains Restoration Strategy Team Lead 72510 Coyote Rd.  
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ATIN: Ayn Shlisky

RE: Blue Mountains Forest Resiliency Project Dear Ayn:

The Wallowa County Natural Resources Advisory Committee (WCNRAC), a committee appointed by the Wallowa County Board of Commissioners to advise them on all natural resource issues appreciated the opportunity to comment on the Blue Mountains Forest Resiliency Project

The WCNRAC agrees that the need "to enhance landscape and species resilience to future wildfire by restoring forests to their natural (historical) range of variation, reduce the risk of wildfire to high value resources both on and adjacent to National Forest System lands, and provide a diversity of economic opportunities and commodities" is a very high priority given the conditions that exist on the National Forest System lands currently.

Furthermore, we understand the desire to develop a programmatic EIS that addresses these conditions and would reduce the time required for the implementation of vegetative treatments,

The project was intentionally designed to:

1. To encompass a large scale and narrow scope
2. Test new planning processes
3. Monitor results
4. Learn from project results, and adapt as needed to achieve desired outcomes on the landscape
5. To produce a single Environmental Impact Statement (EIS), which can support decision making across portions of the three national forests that are not in an Inventoried Roadless Area, designated Wilderness area, Wild and Scenic River, Research Natural Area, or other management area restricted from implementing the proposed activities, or not already covered by similar, existing forest restoration planning efforts.

WCNRAC feels that the project is too narrow in scope and is going after the low hanging fruit again. The following issues have been identified by the WCNRAC as concerns for this project:

1. Does not break up the continuum of forest stands enough to prevent large scale wildfires.

Since the project will occur in 95% of dry forests only and does not include inventoried roadless areas, class 4 streams, old growth areas and other restricted management areas, the approximately 75% of remaining National Forest System lands would not be treated under this . project proposal. This would leave thousands of

continuous acres in their existing degraded condition and subject to catastrophic destruction. The fuel breaks that are planned inside of dry forest stands are a start, however, much more is needed to help control, limit and shape future wildfires. This proposal is like putting a band aid on a gaping chest wound.

2. The increased benefits of this project on values and resources are minimal from this limited proposal.

The mosaic pattern that would be created to enhance wildlife would occur on less than 25% of the National Forest System lands.

This proposal leaves the door open for the negative effects of wildfire and mass movement such that occurred in Tanner Gulch on our aquatic populations.

Berry picking, firewood gathering, camping, and hiking improved benefits would be limited to dry sites.

The proposed project would provide short term economic benefits to local communities, but no long term economic benefits without sustainable forest management and growth.

Aggressive treatments of the forest stands are need to avoid intense fire activity that changes the chemical composition of the soil and delays or inhibits vegetative regrowth, thereby increasing the hazard of erosion and noxious weed establishment.

WCNRAC believes that this is a start, but is it too little and maybe too late? The need is for massive amounts of acres treated to reverse the 25 years of reduce activity.

Thank you for the opportunity to comment on this project.

Bruce H. Dunn  
Chairman of the Wallowa County Natural Resource Advisory Committee