



Oregon

Kate Brown, Governor

Oregon Department of Fish and Wildlife

4034 Fairview Industrial Drive SE

Salem, OR 97302

-503-947-6000

www.dfw.state.or.us



Department of Forestry

State Forester's Office

2600 State Street

Salem, OR 97310-1336

503-945-7200 / FAX 503-945-7212

www.oregon.gov/ODF



"STEWARDSHIP IN FORESTRY"

April 5, 2016

Blue Mountains Restoration Strategy Team

72510 Coyote Road

Pendleton, Oregon 97801

RE: Blue Mountains Forest Resiliency Project

Blue Mountains Restoration Strategy Team:

The Oregon Department of Fish and Wildlife (ODFW) and Department of Forestry (ODF) appreciate the opportunity to comment on scoping for the US Forest Service's (USFS) Blue Mountains Forest Resiliency Project (BMFRP) environmental impact statement (EIS). We are supportive of the BMFRP's purpose to reduce the overabundance of closed canopied forest, enhance landscape and species resilience to wildfire, insects and disease; enhance the diversity and quality of wildlife habitat; strategic placement of fuel breaks, and build and strengthen relationships between National Forest stakeholders. As the Planning Team draft the EIS on this project, we would like to see further discussion and analysis of the following points.

The State of Oregon's August 2014 comments on the Blue Mountains Forest Draft Environmental Impact Statement and Proposed Land Management Plan can be used as a comprehensive reference point for issues important to the State on project level plans within the Blue Mountains, including the BMFRP EIS. These comments are attached.

At this time, we are unclear relative to the relationship between the timelines for both planning and eventual implementation of the BMFRP and Blue Mountains Forest Plan Revision. We would like to have a better understanding of the relationship between these two planning processes at different scales, their respective decision making and how the two efforts will function will be important to building public understanding and support.

Based on conversations with the USFS, we are aware that Travel Management will not be considered as part of the BMFRP EIS. ODF and ODFW share the perspective that smart and sensitive travel management (including dedicated enforcement) is a critical component in enhancing wildlife habitat while ensuring access for firefighter safety and suppression efforts on both public and adjacent private land. The benefits from any forest management for wildlife habitat can be counterbalanced if the impacts of motorized travel are not considered, addressed and enforced. This is especially true, given that much of the BMFRP treatment area is

along the USFS/private land interface. Current big game distribution across much of the project area is skewed towards private land because of disturbance on public land. Enhancing big game habitat and providing sanctuary areas with limited motor vehicle disturbance on public land can even out this distribution and help the ODFW address concerns from private landowners regarding damage from big game species. It will also improve public hunting opportunities; an important social and economic element of eastern Oregon.

Enhancing wildlife habitat, enhancing wildfire resilience, and maintaining firefighter access are not mutually exclusive. ODF and ODFW fully support the USFS proposal to place strategic fuel breaks across a large landscape. The resulting network of fuel breaks over a large geography will afford fire managers the opportunity to utilize and/or catch wildfires to achieve resource benefit on public lands and minimize impacts to adjoining private forestland owners. Strategic placement of roads and fire breaks is critically important to enhance firefighter safety protect. These landscape features also can protect our collective investments in Blue Mountain forests and ensure the economic opportunities these forests provide rural communities are realized. We are confident that collaboration between ODFW, ODF and USFS specialists can address this important need.

ODF and ODFW appreciate the opportunity to comment on the proposed project and look forward to working with the USFS to further protect and enhance fish and wildlife species and their habitats in the planning area. Please feel free to call on us if we could be of assistance.

Sincerely,

Chad Davis
Senior Policy Analyst
Oregon Department of Forestry

Bruce Eddy
East Region Manager
Oregon Department of Fish & Wildlife

cc: Brett Brownscombe, Governor Brown's Natural Resource Office
Ron Anglin, Oregon Department of Fish and Wildlife
Kevin Blakely, Oregon Department of Fish and Wildlife
John Buckman, Oregon Department of Forestry
Doug Decker, Oregon Department of Forestry
Jon Germond, Oregon Department of Fish and Wildlife
Rod Kraemer, Oregon Department of Fish and Wildlife
Travis Medema, Oregon Department of Forestry
Curt Melcher, Oregon Department of Fish and Wildlife