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Blue Mountains Biodiversity Project Comments on the Blue Mountains Forest Resiliency Project:

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The Forest Service is planning to log and do prescribed burning and smaller tree thinning over more than half a million acres across three National Forests, the Umatilla, Ochoco, and Wallowa-Whitman, under only one Environmental Impact Statement and over only ten years.

We reject the goal of further accelerating the scale and pace of logging (aka “thinning”) under the guide of restoration. Faster, larger scale logging will not restore the forests from the impacts from past and ongoing logging, fire suppression, road-building, and livestock use. The Blue Mountains forest 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 Blue Mountains Forest “Resiliency” Project (FRP) focuses on trying to reduce or prevent these natural disturbances, while accelerating the scale and page of forest destruction through over-management. This is not ecologically sound restoration, but instead accelerated forest devastation.

The project scoping letter fails to disclose and address significant scientific controversy over key assumptions fundamental to the project proposal. The project proposal also fails to use the full range of best available current science in designing the project. This so-called “restoration” logging is no longer confined to dry forest types where the science the Forest Service presented once seemed to support thinning. Now where 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. Yet the Forest Service has been ignoring or dismissing this science and has been failing to incorporate the full range of best available science in new projects, including the FRP. We have sent copies of current best available science studies on these topics to the Blue Mountains National Forests with our comments for numerous timber sales. However these newer science findings that contradict basic Region 6 Forest Service assumptions are still not analyzed or incorporated into project planning.

On the other hand, the Forest Service persists in leaving the full text of its Specialist Reports out of the Draft Environmental Impacts Statements and Environmental Assessments released for public comment. By the time a member of the public becomes aware that a particular specialist report is not included in its entirety, it is often
too late to receive a copy I the mail in time to consider it in their comments. Sometimes the information
excluded is as fundamental as the Biological Evaluation of Assessment. Often the exclusion of these specialist
reports leaves critical information required by NEPA to be included in analysis out of these NEPA documents,
such as the methodology used for calculations, fundamental assumptions influencing projected outcomes, and
scientific citations. Specialist reports are often more detailed, and sometimes have different conclusions, than
their summaries in the DEIS or DEA text. As with all other agency projects, we request that the FRP include all
specialist reports in their entirety in the DEIS in the analysis issue text or as appendices. These reports need
to be fully disclosed and posted on line when the Forest Service issues any draft NEPA document, so that all
the information used for analysis is available to the public during the entire comment period.

Given the trend of many such fuel reduction/fire reduction projects reducing forest density in naturally dense
areas needed by adapted wildlife species across these three Forests, we can't trust the Forest not to do the
same with this project - on a much larger scale, all at once. Forest Service plans to remove tree density across
the landscape with this project would remove suitable habitat for many Management Indicator species,
including Pileated woodpecker, American marten, Blackbacked woodpecker, American Three-toed
woodpecker, Northern goshawk, Cooper's hawk, and Sharp-skinned hawk, which represent the habitat needs
of many other species. Such extensive forest density reduction would also 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, as large trees are evidently being planned for
removal, based on the proposed Forest Plan amendments. Significant numbers of down logs and snags would
be removed through prescribed burning, hazard tree felling, road re-opening and building, and "fuel" reduction
in general. The shock to these species' populations of so much habitat being degraded or eliminated at once
over ten years (plus other, similar ongoing and planned fuel reduction/timber sale projects) could be enough to
cause local population extirpations and contribute to a trend toward uplisting, or cause the actual uplisting, of
these and other species.

The studies of historical forest conditions the Forest Service has been using "to help inform natural ranges of
variation" are often old and out-dated or based on models with no pre-European colonization baseline data, so
not necessarily accurate. The analysis for the associated fuel reduction/timber sale projects, including the
scoping document for this so-called Blue Mountain Forest "Resiliency" Project (FRP), does not take into
account the changes to forest structure and tree species composition from past logging, nor the impacts from
logging, road, and livestock grazing pre-dating the HRV data used and thus affecting HRV assumptions.
Achieving replication of the historical range of variability is not a realistic goal, as recognized by many Forest
Service staff and scientists. There is no one static point in time that can be used as a reference point for
return, especially considering natural weather fluctuations over decades and centuries and the game-changing
effects of climate change. Further, the Forest Service is legally obligated to protect and ensure the viability of
Management Indicator species and all native vertebrate species; to prevent uplisting of listed and Sensitive
species; to protect water quality; to protect soil integrity; to meet Riparian Management Objectives; but not to
prioritize and ensure replication of the historical range of variability or to prevent or reduce wild fire severity or
extent.

The Forest Service proposed FRP logging to reduce forest density is not sustainable at the scale and pace
proposed. These three National Forests can't be lumped together as the same HRV "averages" regardless of
all their unique variation in topography, elevation, and latitude. Removal of stand density and canopy cover
should not be a goal in itself or be allowed to drive forest management. Density and higher canopy closure
elimination directly degrades and eliminates habitat for many species adapted to these conditions, including
Management Indicator species such as Pileated woodpecker, Backbacked woodpecker, Three-toed
woodpecker, Northern goshawk, Cooper's hawk, and American marten; and Pacific fisher, a Candidate for
uplisting. 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 and other bird species requiring higher canopy closure such as Hermit Thrush
and Pileated woodpecker. Therefore it is important not to reduce forest density, higher canopy closure, and
multiple canopy layers where these naturally exist on the landscape.

However the scale and pace of the FRP means that these large areas slated for management will not
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 and small trees, moist and dry forest types.

Many eastern Oregon/Blue Mountains wildlife species are also threatened by increased human disturbance caused by logging and roadbuilding. Some of these species are driven away from otherwise suitable habitat by higher noise levels and the sight of humans, such as elk and pronghorn, who use precious fat reserves for winter in flight responses. Songbirds - including Neotropical migratory songbirds - are disrupted by noise levels that mask warning and communication calls. Owls have also been shown to be particularly sensitive to high noise levels. Other effects of increased human access through increased roads and skid trails include higher levels of removal of snags, down wood, and large trees through illegal firewood cutting; increased livestock and ATV access to sensitive riparian areas, including special habitats such as meadows, and aspen and cottonwood stands, with associated introduction and dispersal of invasive plants; and increased fur trapping affecting relatively rare species such as Pacific fisher, Gray wolf, and Wolverine, and Threatened-listed Canada lynx, as well as American marten, a Management Indicator species. So much increased human disturbance of various types happening all at once across three National Forests will have huge cumulative effects to disturbance-sensitive species on these Forests. There will be no time or space for many of them to adjust or find sufficient high security habitat nearby. Loss of viability for such species does not require direct mortality, but can be caused by lower winter survival rates and reduced reproductive success. Increased disturbance impacts to wildlife are another example of management effects that are greatly exacerbated by cumulative repetition across the landscape at an escalated scale and pace.

There is a lot of doublespeak hypocrisy in the contrast between the stated purpose and need and the actual logging proposed, as more large trees would be removed by logging despite promises to increase large-tree dominated stands and to maintain existing old forests and increase their abundance over the long-term. The Forest Service can’t have it both ways, claiming to be basing the FRP purpose and need on Forest Plan direction, yet planning to use Forest Plan amendments to violate key Forest Plan standards. Evidently the Forest Service is specifically planning to violate Forest Plan standards prohibiting: the logging of large trees over 21” dbh; 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, 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.

For instance, the Umatilla National Forest has had many proposed Forest Plan amendments associated with timber sales to reduce elk and deer cover below Forest Plan standards. Even where these Forest Plan amendments were avoided, significant loss of "satisfactory” thermal cover and “marginal” hiding cover occurred. The Wallowa Whitman National Forest was recently thwarted by litigation from plans to log over 7,000 large trees over 21” dbh through the use of a Forest Plan amendment in the Snow Basin timber sale. However we have heard that the Forest Service on the Wallowa Whitman is planning to re-issue these sales under different names. How many timber sales like Snow Basin, where Forest Plan amendments were defeated through lawsuits or objection or appeal negotiations, would be revived under the FRP? We are concerned that many ill-advised timber sale transgressions that were reconsidered through negotiations or stopped by litigation would now be rushed through with a single NEPA opportunity for public comment and little or no disclosure of these past sale issues.

The yellow-marked FRP “project” area on the Umatilla west of Ukiah and North and South of FS rd. 53 includes prime elk habitat where we have fought off significant reductions of needed thermal and hiding cover for years. This area also includes significant acreage of higher elevation, historically moister and denser mixed conifer forest that is naturally subject to infrequent and stand-replacement fire. These forest types (which include Grand fir, Lodgepole pine, and Engelmann spruce) are completely inappropriate for fuel/fire reduction logging and prescribed fire, as proposed by the FRP. Northern parts of the Umatilla National Forest in general include a lot of this kind of naturally cooler, moister, denser mixed conifer habitat. These areas provide suitable
habitats for species like Pileated woodpecker, American marten, and Pacific fisher that require abundant and large down wood and abundant large snags, which are threatened by both fuel reduction-oriented logging and prescribed burning. The southern end of this "project" block south of rd. 53 has been heavily logged before, including the driest Ponderosa pine-dominant part furthest south around Potamus Canyon. Planning to log mature and large trees all at once with the FRG in this area and others with similar high road density and intensive legacy logging and livestock grazing impacts would cause enormous cumulative impacts that could consign the drier areas with marginal soils to no real recovery. What is the "need" for more logging of such heavily logged areas? Clearly logging has not helped them so far. North of road 53 and close to rd. 53 has less road density but more legacy clearcuts that have still not fully recovered. There are no "excess" numbers of mature trees in these areas to be taken, let alone large trees.

The yellow-marked FRP "project" area furthest west on the Umatilla North and South of FS rd. 23 includes much or all of the Heppner District's old "East End" sale, which threatened to log off 55 million board feet and the area came back just fine without further intervention. This is also an area with historical Grand fir and Western larch dominance as moister mixed conifer forest with Pileated and Blackbacked woodpecker. There are some critical fishery issues in this area as well, such as Bull trout habitat in Big Wall Creek and Wilson Creek. We don't want further logging and roading impacts - including indirect hydrological impacts - to these already greatly diminished Bull trout populations.

The yellow-marked FRP "project" area furthest west on the Umatilla North and South of FS rd. 23 includes much or all of the Heppner District's old "East End" sale, which threatened to log off 55 million board feet in response to Spruce budworm. However we negotiated that sale down to 5 million board feet and the area came back just fine without further intervention. This is also an area with historical Grand fir and Western larch dominance as moister mixed conifer forest with Pileated and Blackbacked woodpecker. There are some critical fishery issues in this area as well, such as Bull trout habitat in Big Wall Creek and Wilson Creek. We don't want further logging and roading impacts - including indirect hydrological impacts - to these already greatly diminished Bull trout populations.

The yellow-marked FRP "project" (timber sale) areas adjacent to the North Fork John Day Wilderness raise concerns for us regarding habitat security for dispersal habitat from the Wilderness for rare far-ranging keystone predators such as Gray wolves, Wolverine, and Canada lynx, as well as American marten. This area also includes significant drainage creeks from high elevation wilderness through critical spawning habitat for Steelhead trout and Bull trout stemming up from the North Fork John Day River. Heavy logging and extensive associated roading could decimate last fish runs for these species through steambank erosion, increased sedimentation of streams and creeks, and silting in of pools widening channels and increasing stream water temperatures. This area also includes popular elk hunting areas off Desolation Creek. We are concerned that the ill-conceived Farley timber sale would be revived, threatening key elk habitat and critical Bull trout and Steelhead trout habitat with density-reducing logging and roading on steep erosive slopes over major source creeks for these fish species.

The Camas Creek area in the yellow-marked FRP "project" area off highway 244 Northeast of Ukiah and east and west of FS rd. 54 has many intricate and vulnerable wet meadow areas, as well as high elevation mixed conifer forest naturally subject to infrequent stand replacement fire. Much of this North-central part of the Umatilla is also prime morel mushroom habitat with a thriving mushroom industry that could be extinguished by heavy logging impacts.

As for the FRP map for the Northeast part of the Umatilla National Forest, we are greatly concerned by the heavy and extensive planned logging impacts proposed for FRP yellow-marked areas that have much lower road densities (and possibly less past logging) and a high density of named creeks and campgrounds. The FRP appears to be an attempt to quickly log off precious riparian areas and highly popular recreation areas that would otherwise be hard to get logged due to public opposition. For instance, look at all the campgrounds around the yellow "project" area at the far north end around Big Springs Campground between FS rds. 40 and 41. Doesn't that encompass the currently proposed Sunrise timber sale on the Pomeroy District? We started field-checking the Sunrise sale just last summer. So why is the FRP proposing to log and burn in an area already heavily logged, with excessive cumulative impacts also from livestock, planned currently for another active timber sale, and recently burned by a wild fire?

Note the two campgrounds (Midway and Godman) at either end of the yellow-marked "project" area north and south of Meadow Creek. Then note all the major creeks and the relatively low existing road density in the
central yellow-marked "project" area off roads 64, 63, and 62, along with Jubilee Lake Campground. Unless I'm mistaken, that looks like the active Thomas Creek timber sale area, which we field surveyed just last summer. This area is characterized by extremely steep slopes (thus the low road density) and moist lush high elevation mixed conifer forest which would historically experience infrequent stand replacement fire. One of the many 2015 wild fires may have burned in this area. The FRP scoping document claims to be targeting areas not currently proposed for logging, but apparently that is not true. Apparently, the FRP is also targeting for logging and prescribed burning areas just recently burned by large wildfires. Scientists have recently been speaking out against the post-fire logging of wild fire-burned areas, saying that there are far too few wild fire-burned areas left to recover on their own compared to historic conditions, and that these are critical areas for biodiversity that need to be left alone. Apparently this is another aspect of the best available current science that the designers of the FRP are choosing to ignore.

Logging off large burned snags removed critical snag habitat and large wood structure needed for soil nutrient recycling, carbon sequestration to slow climate change, and snag and log habitat for primary and secondary cavity using species such as Pileated woodpecker, Lewis' woodpecker, White-headed woodpecker, Blackbacked woodpecker, American marten, Pacific fisher, and nuthatches. Remaining large snags and logs after a wild fire are also important constituents of later old growth forest development. There are fire-adapted species such as Blackbacked and Lewis' woodpeckers that depend on (unlogged) periodic large flushes of snags from wildfires to provide insect prey and, in the case of Lewis' woodpeckers, residual perching structure and nest snags long after the fire. These are all issues that must be analyzed in depth site-specifically for the giant FRP if it is not scrapped completely. We ask that the whole FRP be abandoned as an insanely ecologically destructive concept. We are strongly opposed to post fire logging.

As for the FRP mapped "project" areas on the Ochoco, expect tremendous public opposition. The yellow marked FRP "project" areas would entail the logging and burning of close to half of the Ochoco National Forest. What are you thinking? Why do you want to effectively destroy most of one of the most beautiful forests left? Note all the campgrounds around and in the yellow-marked FRP areas. The proposed logging would surround the three small Wilderness Areas in the Ochoco. The large area west of highway 26 has already been heavily and thoroughly logged and livestock-abused. There would be overwhelming cumulative impacts from the FRP combined with all the recent and legacy impacts there. The Mill Creek Wilderness, Bridge Creek Wilderness, and Black Canyon Wilderness have all burned within the last 25 years, so it's not like this area is missing fire cycles. The Bailey Butte Fire burned within the last two years along highway 26, so once again, the FRP is proposing logging and burning in a recently wild fire-burned area which has already been naturally thinned and underburned, as this block overlaps the Bailey Butte Fire area. The FRP area east of highway 26 around roads 2630 and 2620 is currently proposed for a high disturbance-causing Summit OHV trail system, so that's an overlapping active project, and the source of significant cumulative impacts. That area would also be a highly contentious area to log en masse as proposed since there are numerous private landowner inholdings along the east side of highway 26 already strongly opposing the Summit OHV trail system. The southern yellow-marked FRP area south of Deep Creek is adjacent to the proposed east end of the Summit OHV trail and is adjacent to the currently proposed Gap timber sale, which we field-surveyed in 2014. It's not like these areas haven't been or aren't being logged. The FRP area overlaps a cattle grazing allotment that I have field surveyed as well. The Ochoco, like the other Blue Mountains Forests, is highly variable in forest type, based on topography, elevation, aspect, and proximity to riparian areas. There are naturally denser, moister mixed conifer forest types along creeks and on North to Northeast facing slopes even in the southern end of the Ochoco. These areas should not be logged just because they are denser. The northern, higher elevation areas of the Ochoco were obviously historically fir dominant (Douglas and Grand fir) except on ridgelines and margins of lithosols ("scablands"), where old growth Ponderosa pine is more dominant. So it is inappropriate to do fire/fuel reduction logging within the Forest boundary near Barnhouse campground, for instance. We are strongly opposed to proposed logging adjacent to the Cottonwood Creek and Rock Creek Inventoried Roadless Areas and around the Black Canyon Wilderness Area, as this is a less disturbed area with overgrown old roads and is an important refuge for wildlife. We are also concerned about proposed logging in other areas that may be Potential Wilderness Areas or undeveloped areas never before logged and roaded, such as the yellow-marked area west and east of road 22 and the area north of FS rd. 2630. The Ochoco National Forest is a small Forest that could easily be destroyed by the FRP. It is highly popular among a broad spectrum of recreationists and should be prioritized for wildlife (such as critical elk habitat) and recreational use, with the majority use being for quiet recreation, such as hiking, hunting, fishing, camping, nature photography, cross-country skiing, and horseback-riding.

We are also greatly concerned about FRP impacts to the Wallowa-Whitman National Forest, but have spent
less time there, so will address it less specifically. We highly value the area of the Snow Basin sale, along Eagle Creek, for high wildlife values, proximity to roadless areas and the Eagle Cap Wilderness, and high recreational values. We also spent time in the Lower Joseph Canyon timber sale area last summer and appreciated especially the southern Swamp Creek area and places where the old growth had not yet been logged. Much of the Wallowa Whitman has already been transformed into virtually sterile young Ponderosa pine plantations, making the more intact, more naturally diverse parts of the Forest that much more important to protect from logging. This is true of the Blue Mountains Forest in general. There needs to be a major shift in the Forest Service away from unsustainable logging, roadbuilding, and livestock grazing toward passive restoration and full protection from management impacts of last unlogged and unroaded areas.

The net result of the accelerated rate of forest destruction represented by the FRP combined with all the legacy effects of past mismanagement; currently planned and recently implemented timber sales; associated road-building; ongoing livestock-related degradation; toxic herbicide use; and development projects (cell phone towers, mining, gravel pits, Mountain bike and OHV trails, etc.) across these three National Forests equated to general industrialization of the Forests. In the case of wildlife disturbance, soon many of the far-ranging relatively rare predators will not have an adequate foraging and dispersal range with enough habitat security to survive for future generations. Wolverine, and Lynx are known to seek more remote back country with less human disturbance, and both species are dependent on deep snow packs. With the cumulative impacts of climate change reducing snow pack and human intrusions expanding outward toward last roadless areas and Wilderness Areas, they may not be able to survive, as both of these species are subject to trapping and shooting. Recovering Gray wolves also need remote back country wild lands with less human disturbance and less road density. Wolves are at great risk from trapping and shooting that is facilitated by increased human access. Yet these keystone predators and scavengers also need landscape-scale dispersal habitat with sufficient security to regain genetic viability as populations, including unlogged wildlife connectivity corridors. Conservation biologists have long warned that roadless areas and Wilderness areas alone are not sufficient to provide for the habitat needs of far ranging species such as Wolverine, Lynx, and Marten, beyond a few generations without the re-wilding of additional territory. This warning also pertains for large ungulates such as bison and moose. With increased human disturbance on landscape scales, elk are highly unlikely to decline sharply. When this disturbance extends out into high desert habitat, such as with the proposed Summit OHV trail system on the Ochoco, the risk extends to other vulnerable species, such as Pronghorn, and with energy development projects plus cattle and herbicide impacts, Greater sage grouse. The extensive scale of disturbance over a short time frame proposed by the FRP, as a cumulative impact on top of all the other disturbances being implemented and planned across these Forests, could have unprecedented impacts to disturbance-sensitive species, including wolverine; lynx; elk; owl species; Neotropical migratory songbirds; Northern goshawk; and other reclusive wildlife such as Pileated woodpecker and Pacific fisher. The FRP, rather than representing landscape-scale restoration, represents the scale and pace of industrial forestry that could pass a tipping point to ecological collapse.

Logging does not really 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.

The FRP planned actions are unlikely to prevent of significantly reduce wildfire severity and extent, and are unlikely to prevent people’s homes and other structures from burning in wildfires as the FRP focuses on the backcountry rather than on more useful structure protection in the immediate area of the structure, but are likely to cause significant harm to these Forests’ ecosystem integrity and wildlife biodiversity, as well as recreational aesthetics, and indigenous peoples’ treaty rights and cultural uses.

The analysis for these fuel reduction/timber sales also chronically fails to consider how planning to implement more of the same management activities that caused the current state of the forest (used as a rationale for more logging and roadbuilding) would not cause these perceived problems with the forest condition to be exacerbated. 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. Planning to violate already weak Forest Plan standards and direction to protect and retain last remnant large tree structure; last old growth (LOS) forest habitat structure; sufficient thermal and hiding cover for elk and deer; and lower road densities for habitat security is also ecocidal, and perpetuates and exacerbates the existing forest condition deficiencies these standards and direction are meant to remedy. Thus foreseeable results on the ground of proposed FRP actions would be inconsistent with the
purported purpose and need for the project.

The FRP would perpetuate fire suppression by promoting fire suppression fervor through its stated purpose and need component of increasing "public and firefighter safety in the event of wildfire", even though there is no guarantee that planned actions would actually increase public or firefighter safety. The FRP also aims to perpetuate fire suppression by reducing biomass "fuels" needed for carbon sequestration, wildlife biodiversity, and soil nutrient recycling. 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 highly flammable logging slash; and opening up stands, which increases wind speeds through the stands, increasing fire intensity. This outcome would be contrary to the stated purpose and need, yet, as with many other Forest Service fire/fuel reduction timber sale projects, is not considered in the FRP scoping.

The real goals of the FRP appear to be creating and maintaining more Ponderosa pine plantations, speeding up the already unsustainable pace of logging on an even more extreme scale, and swamping opposition by gutting public process through all this logging being crammed into one EIS and somehow accomplished over only ten years. It is highly questionable whether this scale of logging across three National Forests is legal under NEPA for one EIS and such broad scale and rushed analysis. This is a programmatic EIS under the pretense of site-specific analysis which could not possibly be conducted within the proposed time frame. 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 (NFMA).

The FRP management actions would cause enormous impacts to these Forests' ecosystems, unprecedented in scale for one project. Viability for Management Indicator species (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 these MIS on these Forests to accurately determine their population status, reproductive success rates, and viability thresholds.

The forest condition issues raised by the Forest Service in the FRP scoping document are best addressed, and are being addressed, on a site-specific basis at a slower pace that allows for greater public input and better site-specific planning. As it is, at the current escalated scale and pace of so-called forest "restoration" logging, Forest Service staff are stretched too thin to cover the ground sufficiently. Collaborative groups cannot meaningfully integrate a range of social values and concerns into such a fast paced and large scale plan. It is clear that the full spectrum of public interest is not meant to be integrated, based on the rushed public process for a combination of comprehensive management actions of this magnitude, across major portions of three National Forests.

The scale and pace proposed for the FRP would make learning from mistakes and adaptive management virtually impossible for the FRP itself, contrary to the Forest Service's disingenuous claim that the project is designed to "learn from project results, and adapt as needed to achieve desired outcomes on the landscape."

We are 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.

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 strongly opposed to management of last undeveloped lands and Potential Wilderness Areas, as these are last intact refuges for wildlife outside of designated Wilderness, Inventoried Roadless Areas, and Research Natural Areas. Such areas are also vital for preserving interspersed reference points for scientific study and comparison for adaptive management in other areas.

Economic benefits are not supposed to be the primary driving force behind Forest Service management, but
appear to be that in the proposed Blue Mountains Forest Resiliency Project. 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.

We contest the assertion that the current pace of active forest logging is not keeping pace with forest growth, when based on our experience in the field, the trees are getting smaller and younger on average due to the already unsustainably fast pace and extensive scale of such logging. Exhaustion of the soils’ ability to support large, healthy tree growth due to extremely fast rotations with heavy equipment use has already become a serious issue in some parts of these Forests, and is quite evident in over-logged parts of the Malheur National Forest. Deforestation, which is a leading contributor to climate change, is not just cause by conversion of the land to non-forest by development, but by logging at a pace faster than regrowth of trees the same size as those removed. The FRG would contribute to unsustainable deforestation and thus to climate change.

The Forest Service has yet to demonstrate that their Best Management Practices (BMPs) and Project Design Criteria (PDC) are actually effective or are even fully implemented. This gives us no reason to support a massive scale fast timber sale project over three National Forests. A Finding of No Significant Impact for this project cannot be based on the assumed implementation and effectiveness of BMPs and PDC.

We are concerned that the Forest Service expects the public to identify all site-specific concerns during the scoping stage, even though we have no information as to what type of management would happen where in the marked areas of proposed management on the scoping maps, and not enough time to go out and field survey these large areas before scoping or DEIS comments are due. Without more detailed information and analysis it is impossible for the public to respond as to the full range of their site-specific concerns.

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

Karen Coultier