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RE: Blue Mountains Forest Resiliency Project - Proposed Action Scoping

Dear Ayn:

This letter is submitted in response to the US Forest Service request for comments on the Blue Mountains Forest Resiliency Project (Project) - Proposed Action Scoping, which seeks to enhance forest & rangeland resiliency on portions of 1,270,000 acres of national forest lands within the Ochoco, Umatilla, and Wallowa-Whitman National Forests. The Project proposes 610,000 acres of commercial timber harvest and prescribed burning treatments.

I am writing on behalf of Associated Oregon Loggers, Inc. (AOL), which represents more than 1,000 logging and allied forest member companies. These companies play a major role in management of private & public forests throughout Oregon- as contractors, purchasers and vendors of forest management services (operators). AOL member companies commonly sub-contract or purchase Forest Service forestry and roading contracts. AOL contract operator businesses and the forest sector manufacturers (infrastructure) require a reliable quantity of timber supply and forest management project acreage in the Blue Mountains working circle, including federal forests. We encourage national forest projects that promote active management of Oregon's federal forests through sawlog harvest- especially via the restoration of overcrowded and unhealthy forests. As such, AOL represents substantial expertise in forest management. AOL members are directly impacted by this national forest management decision, such as the proposed Project.

We are concerned that the Forest Service planning team has not adequately drafted the Project proposal to incorporate the many clear and present resiliency problems borne on national forests-problems which are increasingly harming the neighbors to national forest lands.

We urge planners to address the impact and effect of how those national forests within the "federal-private interface" are managed, or not managed-where border national forest lands are within two-miles of non-federal property. National forests have thousands of miles of such federal-private interface lands. The proposed Project, as proposed, largely ignores neighboring non-federal forest/range/farm property owner issues-by impacting those private neighbors with private property losses originating from federal lands. Federal threats are often unilateral (impacting only the private neighbor), because federal forest legal "sovereign immunity" from damage liability claims by a private landowner, resulting from a federal spread to private property of fires/pests/damages.

This important issue-national forest federal-private interface impacts on nonfederal neighbors-is relevant to this Project, because private neighbors are impacted by national forest resiliency, forest health, habitat, road access, and protection. A number of national forest-borne threats are a clear and present danger to neighboring non-federal lands, including:

- * Wildfire destroying timber, resources, grazing, cattle, property improvements, property uses
- * Pests & disease destroying timber, resources, grazing, property improvements, property uses
- * Invasives damaging timber, resources, grazing, cattle, property improvements, property uses
- * Impaired protection from wildfire and firefighting (due to absence of sufficient road access, wildland fire management, prescribed burning, etc.)
- * Impaired preventative maintenance from wildfire and pest hazards (due to absence of sufficient response to now-increasing overcrowding, mortality, fuel buildup, tree damage)
- * Elevated forest fire protection assessment, and harvest tax rates-paid by neighboring forest and rangeland private property owners-because of escalating large firefighting private costs magnified by increasingly-hazardous forest fuel conditions on national forest neighbors.
- * Impaired forest product and grazing markets-that severely devalue private timber, forest and rangelands, and reduce infrastructure capacity of forest and grazing sectors-all because of unpredictable, unreliable, and declining national Forest Service harvest volume and grazing AUM's from neighboring national forests.
- * Road access and rights-of-ways to non-federal lands encumbered by the Forest Service, unduly/not shared by the Forest Service; delays for reasonable special use/access needs
- * Big game damage from forage-deprived herds (elk)
- * Smoke impacts on neighbors from national forest wildfires
- * Water production impairment (due to either encumbrance or resource damage)
- * Prohibitions against other customary neighborly activities

These national forest-borne threats are greater on the federal ownership than exist on the managed private forest and rangelands. Therefore the national forest-borne threats are a direct impact on neighboring private lands-a problem that warrants addressing in the Project. We urge the Project team to codify this federal-private interface concern into Project's purpose, need, issues, alternatives, proposed action, broad-scale assessment, management opportunities, focus areas, restoration needs, benefits, and highly-valued resources.

This federal-private interface concern is quite different than the Project's stated "all lands assessment," as we urge you to focus on the national forest effects on the human and natural environment. Attempts to diminish this concern through the so-called "all-lands" approach would fail to respond to the very real problem of how national forests impact their neighbors. We urge you to incorporate this concern into the Project.

As I talk with my peers, I hear that my national forest interface concern is shared by a number of forest sector organizations and interests within the Blue Mountains working circle, including: forest contractors, forest small businesses, small & large forest landowners, rangeland & farm landowners, forest sector manufacturers, federal timber purchasers & service contractors, forest motorized recreational users & hunters, rural retail businesses, rural workers & their families, local governments, and community service organizations. We appreciate the opportunity to comment, and are writing to urge you to proceed promptly with Project planning, while addressing our recommended improvements to Project viability and landscape outcomes. Please consider the following 26 recommendations for honing the Project purpose & need, issues, developing alternatives, and choosing a proposed action (A. to Z.).

A. 'Federal-Private Interface' national forests impact their private neighbors. Federal forest management has direct effects and encumbrances that unilaterally impact their non-federal neighbors. The Project should address these impacts during consideration about how the "federal-private interface" national forest lands are managed, or not managed. The Project should not ignore neighboring non-federal forest/range/farm property owner issues-by impacting neighbors with private property losses originating from federal lands. The Project should change its border management Standards within 2-miles of its national forest boundary to direct future national forest interface management-in a way that respects neighboring property values.

There are currently many unmitigated national forest impacts on private neighbors that could amount to private property takings by the federal government. When national forest lands severely impact their neighboring private forest and rangelands with unwanted losses from spreading federal fires and pests, private forest owners lose the value of their private timber, range, forage, livestock, habitat, water, aesthetics, roads, property improvements, structures, homes, utilities, recreation, and land. Lacking economic value from growing and

harvesting private trees and rangeland, these neighboring private landowners may be more likely to clear their forests for land-use conversion to non-forested uses (eliminating forest cover: home development, agriculture, mining, grazing, or fallow land).

Project planning should consider the very real concerns of the neighboring non-federal property owners. Through over a decade of national forest planning and public involvement, these issues have been voiced and written to forest planners-yet, the Forest Service has wrongly chosen to overlook the severe and ongoing impacts about how border national forest management affects their neighbors.

B. Transference of national forest risks to private property (from unhealthy national forests). Many federal forest threats are often one-way in their "transference of risk" unilaterally from federal lands to their nonfederal neighbors. The Oregon private forest landowner is increasingly confronted by the "unhealthy" condition of neighboring national forests, which may be either adjacent to, or nearby the private forest/range/farm land ownership. These federal-private interface national forest lands threaten neighboring non-federal forests, via federal overcrowded and hazardous conditions that foster the spread of unwanted federal wildfire, pests, disease, invasives, and big game damages-which readily spread to damage private forests.

Legally and in-reality, the spread of national forest hazards are a one-way street, where the federal threats most often unilaterally spread to impact primarily the non-federal forest/ range/ farm. Federal threats are often unilateral (impacting only the private neighbor) because of the following: 1) federal forest legal sovereign immunity from damage liability claims by private landowner, resulting from a federal spread to private property of fire/pest/damage; 2) legal precedence of federal government winning fire damage claims against private forest fires (damaged federal forests); 3) federal forests more overcrowded, combustible, diseased, pest-ridden, invasive-spreading, decadent; 4) federal forests less road-accessible to firefighters; 5) federal forests historically greater wildfire acreage in Oregon; and 6) federal forest barriers to easement and access sharing.

These national forest-originated threats affect neighboring private forest landowners indirectly a less-than-obvious manner; yet very costly way. The transference of risk unilaterally from federal lands to their nonfederal neighbors can adversely impact forest sector infrastructure-where private timber/regeneration destroyed by spreading federal forest fires, pests, or big game damages cannot contribute to timber mill production and long-term viability. Also, small forest landowners who lose their timber value to spreading federal fires, pests, or big game damages may choose to not reforest-instead clearing the land, and converting to a non-forest land use (reducing future timber supply to mills). The transference of risk to non-federal forests, and the chronic management reductions in local national forests currently severely impacts these private forest and range landowners; and the landowner's long-term sustainability is truly impaired by unmanaged neighboring national forests.

National forest lands neighboring non-federal lands often have higher fuel loadings and limited road access, which complicate fire control efforts and commonly are a factor in producing larger, more destructive fires that jeopardize private property, private natural resources, livelihoods, public health, and human life.

C. Large blocks of unmanaged national forests near federal-private interface impact private neighbors. We have serious concerns about large blocks of unmanaged national forest land, which are often located in the federal-private interface. These large blocks of unmanaged national forests are alarming to their neighbors because of dangerous fuel loading, increased mortality, excessively high fire hazard, and limited access-it all which combine to increase the potential for unwanted wildfire spread, and larger, more expensive fires (costly to fight and wreak costly property damage).

National forest lands in large blocks that are unmanaged typically have higher fuel loadings and limited road access, which complicate fire control efforts and commonly are a factor in producing larger, more destructive fires that jeopardize private property, private natural resources, livelihoods, public health, and human life.

D. Spreading national forest wildfires negatively impact private property neighbors. Oregon's private forestlands uniquely are personally responsible for paying one-half of their own large forest firefighting costs, through assessments and fees. This means that when there is a greater risk of large forest fires spreading from overcrowded and unhealthy national forests, then the private property owners statewide collectively are fiscally indebted to pay half of the greater firefighting expenses annually contributed by neighboring unhealthy national forests.

We are concerned that overcrowded and inaccessible national forests cause higher fiscal impacts on private forest and rangeland neighbors. Without more careful thought and planning-which includes consideration of such impacts-federal management choices would result in impacts to neighboring private landowners, including higher fire protection assessments and fees, property losses, increased forest management costs, plus loss of control over resource land management.

E. Scarce national forest road access would preclude needed mechanical resiliency treatments and other essential forest management, including fire protection. The Project should avoid including onerous constraints on forest roads that would create Defacto prohibitions on important forest resiliency benefits and improvements.

The transportation system should be expanded and improved to facilitate current resiliency treatments AND road management to achieve an array of objectives, including: forested recreation in a healthy and safe atmosphere, firefighting, forest fire protection of boundary forests neighboring private lands, tribal and cultural uses, habitat improvement, timber harvest, forest vegetation treatments, fire prevention & suppression, rangeland & forage management, agency administration, forest worker safety, and public safety during road travel. We support forest road system improvements greater than those items in the Project proposal, and additionally urge including further road reconstruction, road construction, managing both open & closed roads; and a "roads analysis" that would fairly balance the socio-economic and resource objectives.

Without additional road construction and reconstruction, now-insufficient road access would have severe negative impacts to the following: timely wildfire initial attack needed to keep unwanted fires small; mechanical forest resiliency treatments involving forest health improvement/ thinning/ fuel reduction/ commercial timber harvest; forest fire protection to prevent large catastrophic fire spread; blocks access to neighboring lands; harms protection of neighboring lands; impairs neighboring timber & grazing management; obstructs neighboring roaded recreation; transfers big game forage use to private lands when federal lands inaccessible to manage for game forage; and jeopardized private land investment in forest health restoration and habitat enhancement.

Project proposal wrongly-limits forest road mileage, road construction, road maintenance, and road density. Project should have fewer road limits, and road construction should be included where important issues warrant improved access for national forest management that would yield important mechanical forest resiliency treatments involving forest health improvement/ thinning/ fuel reduction/ commercial timber harvest, neighboring property protection, or other values. Roads and their needed management are inordinately restricted or prohibited in the Project proposal -even though roads are necessary to manage for the desired improved forest resiliency, thinning, timber harvest, firefighting, habitat enhancement, game forage, forest protection, and neighboring property access.

In the 'General Forest' and 'Timber' Management Area allocations, forest road management should not be unduly-constrained; please do not indirectly hamper and reduce important forest management and harvest operations via Defacto road prohibitions. Many proposed road limitations would be inconsistent with the stated purpose of the 'General Forest' and 'Timber' Management Area allocations. Planners are urged to change the Project's proposed road provisions to allow more road mileage, construction, and maintenance across all land allocations.

The Project unduly-constrains road management and use of existing roads (system or non-system); such constraints are unnecessary and would indirectly hamper and reduce important forest management and resiliency operations. Many proposed road limitations would be inconsistent with the stated purpose of the 'General Forest' and 'Timber' management area allocation desired conditions stated in the Forest Plans. Planners are urged to change the Forest Plan's proposed road provisions to manage and construct more road mileage and maintenance to improve resiliency.

National forest lands neighboring non-federal lands often have limited road access, which complicate fire control efforts and commonly are a factor in producing larger, more destructive fires that jeopardize private property, private natural resources, livelihoods, public health, and human life.

F. Border national forests limit neighboring access. Federal forest management has direct effects and access-related encumbrances that unilaterally impact their nonfederal neighbors. The Project should address the impact during consideration about how the "federal-private interface" national forests are managed-to facilitate prompt, reasonable, cost-effective, and fair access to neighboring non-federal property owners (easement,

rights-of-way, roads & trails, temporary special use access, cable logging tailhold access, irrigation/water use, utility corridor, and so forth. The Project must alter its national forest interface management Standards within 2-miles of boundaries to direct future national forest federal-private interface management, which respects neighbor's property access.

G. National forest interface lands negatively impact small private property neighbors. We are concerned that forest management practices in these federal-private interface federal forests would, if the Project neglected this issue, ignore significant impacts that national forest practices are likely to have on small private forest and rangeland neighbors. Without more careful thought and planning that includes consideration of such impacts described above, Project management choices could result in further loss of control over private resource land management by private landowners.

Experience teaches us that failure to provide family landowners with some measure of control over their lands can lead to harmful demographic shifts in forest and rangeland ownership patterns in northeastern Oregon. The unwanted risk of changing land-use to non-forest uses (home-sites or agriculture) is very real-if growing & harvesting timber and forest products becomes uneconomical.

Without drawing neighboring landowners permanently into the planning and implementing process, the proposed Project could only guess at what additional impacts proposed practices might have on small adjacent landowners. Wildlife corridors, wildfires, pests, roads and other access, blow down, water management, displaced game -- each is likely to impact neighboring lands more than the national forests themselves.

The message here is that the national forests do not exist in a vacuum. Those practices implemented within the national forests will generate consequences for neighboring properties and their owners-especially harmful consequences for small private property owners. AOL recommends this issue be seriously addressed in the Project designs.

H. Interface of wildland-urban areas (WUI). Similar to the federal-private interface forests discussed above, neighboring forests having residential development warrant Project management strategies that would respect the non-federal property structural values. In these WUI areas, national forest lands within 2-miles should be considered for conducting intensively-management, which would not subject those non-federal neighbor structures and improved properties to undue wildfire hazards. The Project should identify, address and propose solutions for this challenge.

I. Ecological restoration of resiliency stalled without sufficient forest sector infrastructure. With existing forest sector infrastructure imminently in jeopardy of further losses, this impact clearly would translate into additional peril to future national forest resiliency. Under the weight of so many current forest sector ailments, the national forests can anticipate escalation of forest health debacles. The single greatest opportunity to remedy this un-sustainable national forest health situation would be to increase the national forest sawlog supply from within the working circle. The following concerns should be addressed in the Project-to avoid derailing future needed improvements to address the deteriorating national forest resiliency:

1. Forest infrastructure needed to manage national forests. Without an effective Project design, the forest sector infrastructure in the working circle would be unable to conduct the necessary forest management needed to help improve the forest's resiliency, health and sustainability.
2. Negligible progress toward Desired Conditions; fire hazards not reduced. The lack of progress in reaching stated Desired Conditions in the Forest Plans (or the Project's proposed purpose and needs) is a pervasive problem throughout the Project proposal. The perpetuation of catastrophic-scale destructive conditions throughout this Project implementation would deny achievement of future forest resiliency across the three Forests. Questionably-modest progress would be made toward improving the Fire Regime Condition Class by the proposal.
3. Project proposal would make insufficient progress toward reducing forest health problems and biomass build-up. There are catastrophic implications of harvesting too little timber volume, far below growth. Excessive woody biomass ingrowth would continue to rapidly accumulate; and the Forests would grow more overstocked and hazardous year-by-year. Project would progress toward desired conditions concerning resiliency and Fire Regime Condition Class.

J. Sustaining and protecting the forest sector infrastructure. The Blue Mountains region of Northeast Oregon has experienced a dramatic decline in forest sector infrastructure in the past 26 years. Much of this elimination of sector capacity is attributable to the decline in national forest timber sale sawlog volume. The forest sector

industry and national forests are mutually reliant upon increased future federal forest management-the industry needs the federal timber supply and forestry production work, while the agency needs the operational management of its forests.

Future Sector Growth: There is tremendous opportunity for strengthening the forest sector infrastructure in the Blue Mountains working circle. In August 2014 AOL provided the Blue Mountains national forest planners with a forest sector infrastructure report ('Forest Sector Infrastructure in NE Oregon's Blue Mountains', August 2014). This report concluded that once the forest sector infrastructure acquires 335 million bdft/year of sawlog volume from the national forests, then the sector could grow to compete on a sustained, long-term basis in North American markets.

Urgency to Increase National Forest Harvest: Without a predictable increased sawlog timber supply in the near future from national forests above current volumes, much of the existing infrastructure capacity is imminently vulnerable to further permanent loss. This outcome would be a tragedy for the future management of the working circle's national forests, harmful for private forests, and thoroughly devastating for the unique rural livelihood of local communities.

Un-Sustainable Forest Sector: Currently, the existing forest sector infrastructure that remains in the Blue Mountains working circle operates at a significant competitive and economic disadvantage. Many of the circle's forest sector businesses (mills, forestry contractors) are in peril of further adverse down-sizing, or worse, closure. Many forest landowners are in peril of losing markets for their timber, or selling sawlogs to distant buyers (including export markets). The current average production/operating levels of mills and forest contractors are unsustainable into the future-due to limited operations averaging 39% of capacity, an average of 0.9 shifts per mill, and 46% of total sawlog volume from distant sources outside the circle ('Forest Sector Infrastructure in NE Oregon's Blue Mountains', August 2014).

Sawlog Volume Needs Assessment: This comprehensive analysis of the forest sector infrastructure current operations, and future needs, explores the sawlog volumes and sawlog sources needed at five different operating levels for existing sawlog-consuming mills ('Forest Sector Infrastructure in NE Oregon's Blue Mountains', August 2014).

Mutual Reliance: The working circle's economic performance of the forest sector is necessarily reliant upon all forest ownership categories to harvest ample sawlog volume (335 million bdft/yr), which would sustain the forest sector infrastructure that manages and produces economic value from all categories of forestlands over the long-term. The performance of the working circle's forest sector infrastructure hinges upon the future status of the now-uncertain national forest timber supply ('Forest Sector Infrastructure in NE Oregon's Blue Mountains', August 2014).

Sawlog: The forest sector's principal economic engine of the working circle is the conifer sawlog. This metric is the single-most important determinant of economic viability for the circle. Because sawlog consumption produces the highest value forest products, the economic viability of these primary sawlog mills are the milestone to measure forest sector sustainability. The decline in USFS timber sale sawlog component percentage since the 1990s has been problematic for the economic sustainability of the sector infrastructure. The sawlog is the forest product that generates value from forest management; as pulplogs typically have marginal to negative value at a Blues working circle mill ('Forest Sector Infrastructure in NE Oregon's Blue Mountains', August 2014).

Competitive Markets: The presence of robust, competitive markets is necessary to support forest management that produces value from sawlog volume. Market competition is a key factor of forest sector and infrastructure sustainability. Competitive markets having multiple buyers and sellers are essential to sustain a viable sector long-term in the Blues working circle.

Sustainability & Distant Sawlogs: There are numerous factors influencing infrastructure sustainability described in the above-referenced report. When purchasing primary mills are too distant from the forest, the delivered-log costs are higher for the mill. The most cost-effective sawlog destination is a local primary mill within the working circle. The chronic reduction of sawlog harvest from local national forests currently has reduced the number of purchasing mills, and made those mills more distant. Lacking sufficient mill purchasers, forest landowners also are currently impacted by the too few and distant sawlog purchasing mills.

K. Comprehensive socio-economic assessment needed. AOL requests that the Project documentation provide a complete assessment of the social and economic impacts of all alternatives, including any reasonably foreseeable impacts to the forest sector infrastructure and local forest communities and county governments.

Over the past decade, AOL has stressed the urgent ecological, social, and economic needs to dramatically accelerate the pace and scale of active forest restoration on the Eastside forests of Oregon specifically the forests of the Blue Mountains. We must learn the lessons from states such as Arizona, Colorado, New Mexico

and Utah, as well as areas closer to home, where the consequences of inaction eliminated the forest sector infrastructure. This Project should address its contribution toward preventing further losses of forest infrastructure, before we too lose both the resource and the industrial infrastructure which provide the tools necessary for ecological restoration and the base for economic and social stability of the Blue Mountains working circle.

The existing forest processing infrastructure within the Blue Mountain region requires at least 335 MMBF sawlog volume annually from the national forests in this working circle, to support sustainable operations ('Forest Sector Infrastructure in NE Oregon's Blue Mountains', August 2014).

Yet, we are very disappointed in the tepid economic 'purpose' and 'needs' stated in the Project proposal. The economic 'purpose' states: "provide a diversity of economic opportunities and commodities." The lone economic need states: "support local economies by providing a diversity of resource management activities, commodity outputs?" These generic economic objectives fail to be responsive to the forest sector, to the local communities, to local forest users and ranches, and to local governments. Under the weight of seven other dominating ecological stated 'needs,' the Project's stated feeble lone economic and social 'need' is likely to be overwhelmed in the Project design. As stated, the stated Project proposal's 'purpose' and 'needs' are completely non-responsive to a host of economic and private property concerns described in this letter. This is unacceptable.

L. Lacking proposed harvest to improve big game forage. Project proposal fails to address the important big game habitat and game management as a need or concern. This omission of the important forage and management needs would mismanage big game habitat by not allowing enough regeneration harvest acreage. Increased regeneration harvest is urgently necessary to increase needed big game forage that would keep herds sustainable. Planners are urged to change big game habitat forage standards to foster increased regeneration timber harvesting, which over time is necessary to provide game forage. Furthermore, increased national forest game forage production is needed to better manage and prevent unwanted game damage on neighboring private forest, ranch & farm lands (damage to private crops, tree regeneration, fences, water developments, etc.). Additionally, forest roads are inordinately restricted or prohibited by the proposed Project - such that the big game forage and habitat could not be managed more effectively via gates and forage seeding. The Project needs to correct its proposed road prohibitions. Instead, the Project should foster additional managed forest road mileage, where roads could be gated to allow closure-management, and roads seeded with forage grasses that would improve game habitat utilization.

M. Accumulating biomass would result in increased wildfire and smoke pollution. Due to little progress toward improving fire resiliency over the past 25 years-and minor attempts to reduce the alarming biomass accumulation on national forests, it would be completely predictable that large catastrophic wildfires would increase and persist in the future. This outcome should be addressed in the No Action Alternative. The proposed Project wrongly fails to address the smoke pollution and carbon impacts of the predictable wildfire persistence-and escalation. The Project fails to anticipate a predictable dramatic increase in acreage and tonnage of wildfire burning. These excessive increases in wildfires burning would not comply with the federal Clean Air Act, and air quality standards administered by the Oregon DEQ and federal EPA.

N. Unrealistic amount of prescribed burning. The proposed resiliency Project wrongly anticipates dramatic increases in acreage and tonnage of prescribed burning-at the loss of more appropriate mechanical harvest and mechanical fuel treatments. These excessive increases in prescribed fuel burns would simply not be possible under existing Oregon's Smoke Management Plan-which is implemented to comply with the federal Clean Air Act, and air quality standards administered by the Oregon DEQ and federal EPA. The USFS already has an extensive backlog of unburned acreage-under a much smaller current annual burning acreage than the proposed Plan envisions. The Plan completely fails to consider this very real existing threshold in its mix of forest treatments. The Project must instead consider increased mechanical fuel treatment in conjunction with commercial timber harvest to cover treatment costs.

O. Large Project landscape size & scope is correct: We urge increased acreage treated and higher volume removed per acre. This larger-than-ordinary landscape scale approach provides for better scale economies, as well as the ability to efficiently meet resiliency purpose. The proposed treatment of at least 48% of the watersheds considered provides a good basis to begin addressing the resiliency purpose. However, to provide reasonable scale economies, we recommend that the harvest acreage be increased to address our concerns stated herein. Furthermore we recommend increasing the timber volume harvested per acre to improve

economic efficiency and opportunity to fund non-commercial resiliency treatments. We urge more intensive commercial timber harvest and increased newly-built road access to now-unhealthy national forest lands. With suggested modifications, this large-scale project could conduct the urgently-needed forest health improvements, contribute sawlogs to the economy, sustain or expand forest sector infrastructure, reduce threats-loss-costs to neighboring private property, improve forest roads and watersheds, enhance habitat, dampen fire hazards, thin over-stocking, curb disease & pests, and expand future management opportunities.

P. Modify Purpose & Needs. The stated 'purpose and needs' should be rewritten to include several modifications described in our recommendations, which would better achieve improved resiliency and facilitate accomplishment of the desired future forest conditions. Clarification to articulate a comprehensive Project purpose and needs is seminal to guide planning and cost-effective implementation. The following additions would improve the purpose and needs:

1. ADD Improve and maintain forest access roads necessary for long-term land management, resource protection, recreation, agency administration (including emergency access), and project implementation.
2. ADD To implement an economically-efficient project that optimizes positive timber value that can support non-commercial resource improvements.
3. ADD Reduce potential for large national forest-originated wildfires that could impact neighboring private lands.
4. ADD To reduce national forest impacts on neighboring private property
5. ADD Federal-Private Interface Forests - National forest lands within 2 miles of neighboring private or non-federal property, and WUI areas, need to be managed to reduce potential for large national forest-originated wildfires that could impact those neighbors.
6. ADD Forest Access - The road system is in disrepair, in-places impacting resource values, and in other places insufficient to accomplish long-term land management, resource protection, recreation, neighboring property protection, agency administration (including emergency access), and project implementation.
7. ADD Timber Yield - Sawtimber harvest volumes from the Blue Mountains national forests are well below the quantities necessary to sustain the existing forest sector infrastructure in the Blue Mountains working circle. Therefore, maximizing the significant sawlog timber harvest from this project is essential to maintain this local forest sector infrastructure.
8. ADD Economics - Efforts to optimize and balance economic and resource value tradeoffs will be necessary. Alternatives considered that would achieve greater economic values and lesser ecological values. Options should explore optimizing the following: increased sawlog harvest volume/acre; higher sawlog to fiber ratio on an acre; more project acres of commercial treatment vs. less non-commercial treatment; additional road access constructed and reconstructed for long-term management; mechanized falling and whole-tree logging maximized.

Q. Economic feasibility is essential. Economic factors are critical to accomplish a viable Project, as well as to accomplish a host of resiliency improvement activities. Prescriptions and project plans should optimize economic value of the timber harvested. Stated another way, the residual value of the timber volume must be positive (the log pond value less the total costs of operating/harvest and project improvements/allied activities).

For example, the economic means to help pay for the non-merchantable thinning (or other enhancement tasks) is derived from optimizing the sawtimber harvest of merchantable trees. Such optimizing of value harvested should involve the following: cutting some trees over 21" dbh; elevating volume per acre removed; a practical forest road network to optimize access to managed portions of the landscape; designation by description/purchaser select (reduced marking cost/improved residual stands); implemented treatments fully harvest the planned NEPA timber removal; created openings/gaps that bolster economic harvest; each acre treated optimizes harvest value; harvest of imminent tree mortality surplus to snag/large tree needs-regardless of size; harvest of high hazard pest & disease trees surplus to snag/large tree needs-regardless of size; and optional removal of unmerchantable material from the sale area. Without cost-effective sawlog revenue

included, the non-commercial treatments become infeasible.

R. Forest Plan Amendments and 21" diameter limit. We agree that forest plan amendments are essential for the project to be feasible, to meet purpose & needs, as well as to accomplish all the desired resiliency objectives.

The agency should consider a forest plan amendment to harvest trees over 21" dbh, of any species, as a necessary component to implement the desired future conditions sought by this project. Harvesting a portion of these plus-21" trees is absolutely necessary to reduce unacceptable risks of future landscape-scale forest losses to catastrophic fire, pests, disease, and storms. We strongly support your efforts to commercially thin trees, and create openings, to restore forest resiliency while moving the project area toward the historic range of variability, to sustain riparian areas, and to reduce disease problems. The desired future conditions stated in the Forest Plans necessitate that those desired conditions cannot be accomplished without harvesting some plus-21" trees, of any species.

Please consider allowing some large trees to be removed, subject to the Silviculturist's professional discretion and written prescription. There are trees of all species that would be subject to imminent mortality, and warrant removal to achieve the prescriptive and desired future condition objectives. Please consider an alternative allowing practical Silviculturist prescription that would facilitate removing some large trees-so as to accomplish forest health and fire reduction objectives.

S. Avoid limiting the options for "connected actions" language. The proposed harvest and road treatments necessarily must include a full range of "connected actions." NEPA language should not become self-limiting- in other words, authorized connected actions should be defined in broad terms using objectives that would not prohibit a specific necessary activity (which had failed to make a prescriptive self-limiting list). Broad categories might include a full-suite of available tools, such as: worker and public safety authorized during operations, reforestation, young tree release/ improvement, fuels treatment, pest & disease control, invasive control, road maintenance, fire prevention, prescribed fire, and hazard removal.

T. Avoid prescriptive logging/operational methods language. Timber should be harvested using appropriately-prescribed ground-based, cable, or helicopter logging methods. I'd urge you to design sufficient logging/transportation plans that would facilitate nearly all logging by ground-based or cable systems. Planned construction of roads (temporary or other) to facilitate harvesting sites by ground-based or cable logging would be the most economical and environmentally rationale (rather than helicopter yarding low volumes/acre). Helicopter yarding feasibility demands higher value/volume per acre-which is more typical of regeneration harvest methods. It is unreasonable to dictate harvesting the low volume/acre proposed from thinning. "Skyline" is needlessly too prescriptive for NEPA language-considering the array of cable-based methods that could yield desirable yarding results. Furthermore, the NEPA decision document language should accommodate a full range of modern harvest technologies; rather than needlessly prescribing one specifically-limiting system or method. Express harvest objectives as outcomes, rather than prescriptive equipment requirements. For example, whole-tree logging, shovel logging, grapple skidding, and feller-bunchers (on all slopes) should be viable methods, subject to the professional discretion of the timber sale officer, logging contractor, and timber purchaser-considering real-time, on-site conditions. Mechanical timber falling and fuel treatments using mechanical methods-such as shovels, grapple machines, feller-bunchers & processors-should be allowable on cable or helicopter yarded units. The NEPA decision must not limit these prescriptive sorts of operational decisions before the contract is offered.

U. Support "thinning and low severity fire" prescriptions. We strongly support the proposed thinning and mechanical or burning fuel treatments. This harvest is necessary to promote desired future sustainable and resilient forest conditions, including: resilience to fire-pests-disease-storm disturbances, with forest management and recreation in healthy and safe forests accessible by roads.

V. Support "opening treatments to create gaps" prescriptions. We strongly support the proposed opening treatments to create gaps with allied fuels, burning and regeneration treatments. This harvest is necessary to promote desired future sustainable and resilient forest conditions, including: resilience to fire-pests-disease-storm disturbances, with forest management and recreation in healthy and safe forestlands accessible by roads.

W. Support "strategic fuel treatment" prescriptions. We strongly support the proposed strategic fuel

treatments to foster better fire prevention and management. This harvest is necessary to promote desired future sustainable and resilient forest conditions, including: resilience to fire-pests-disease-storm disturbances, with forest management and recreation in healthy and safe forestlands accessible by roads.

X. Support "larger diameter treatment" prescriptions. We strongly support the proposed larger diameter (>20" dbh) treatments to harvest some trees over 20" dbh, which improves resilience and forest health outcomes-as well as enhancing economic values and contributions of the treatment. This harvest is necessary to promote desired future sustainable and resilient forest conditions, including: resilience to fire-pests-disease-storm disturbances, with forest management and recreation in healthy and safe forestlands accessible by roads.

Y. Support "aspen and grassland restoration treatment" prescriptions. We strongly support the proposed aspen and grassland restoration treatments to foster improved sustained native ecosystems diversity across the landscape. This harvest is necessary to promote desired future sustainable and resilient forest conditions, including: native habitat diversity, resilience to fire-pests-disease-storm disturbances, with forest management and recreation in healthy and safe forestlands accessible by roads.

Z. Support "riparian habitat conservation area treatment"; however, we recommend increasing the upper-diameter removal size. We support the proposed RHCA restoration treatments to foster more diverse and resilient riparian ecosystems across the landscape. However, we recommend increasing the upper-diameter removal size to 16" dbh, which would improve resilience and forest health outcomes-as well as enhancing economic values and contributions of the treatment. This harvest is necessary to promote desired future sustainable and resilient forest conditions, including: native habitat diversity, resilience to fire-pests-disease-storm disturbances, with forest management and recreation in healthy and safe forestlands accessible by roads.

Thank you for the opportunity to comment about the Blue Mountains Forest Resiliency Project. If our comments create questions, please do not hesitate to contact me: 503-364-1330, or by email: rstorm@oregonloggers.org

Sincerely,
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