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Please accept our attached comments on the Blue Mountains Forest Resiliency Project.  
We appreciate the opportunity to be involved.

Blue Mountains Restoration Strategy Team  
72510 Coyote Rd.  
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Dear Blue Mountains Restoration Strategy Team,

The Lands Council would like to provide comments on the Blue Mountains Forest Resiliency Project. The action to be taken would include the following treatments:

On the Ochoco National Forest, thinning and low severity fire would be applied to dry forests on about 115,000 acres within the project planning area: 20,500 acres of smaller diameter stands. 55,000 acres of larger diameter (>about 20" dbh), closed-canopied; 15,000 acres in larger diameter, open stands and fuel treatments could be applied on up to 5,800 acres of smaller diameter moist and cold forest.

On the Umatilla National Forest, thinning and low severity fire would be applied to dry forests on about 125,000 acres within the project planning area: 69,500 acres of smaller diameter, closed-canopied stands; 36,000 acres of smaller diameter, open stands; 1,000 acres of larger diameter, closed-canopied stands to move them toward more open conditions, and encourage growth in average diameter; and 4,200 acres of larger diameter, open stands.

On the Umatilla National Forest, strategic fuel treatments could be applied on up to about 87,500 acres of smaller diameter moist and cold forest to achieve desired planned and unplanned fire behavior, facilitate safe and effective fire management, conserve high value resources, and restore fire at landscape scales more reflective of the RV. These treatments would be integrated with upland dry forest treatments to achieve landscape-level objectives.

On the Wallowa-Whitman National Forest, thinning and low severity fire would be applied to dry forests on about 190,000 acres: 127,500 acres of smaller diameter, closed-canopied stands; 39,500 acres of smaller diameter; 1,000 acres of larger diameter, closed-canopied stands; and 7,200 acres in larger diameter, open dry forests.

The need to modify forest structure and composition across large portions of fire-prone forests in the western US to increase resistance and resilience to disturbance and climate change is well established. Our question is how the acreages proposed for treatment were determined, and whether a landscape evaluation that included impacts of both wildfire and fire suppression was part of the model. Our reading of the project indicates it does not seem to have a focus on species composition, but instead focuses on stand structure.

Wildfires and fire suppression are modifying the structure and composition of forests at rates that far exceed

mechanical and prescribed fire treatments. The reality that wildfire will do much of the work of resetting vegetation and fuels across the west is becoming increasingly apparent. The "work" of wildfires can be beneficial in terms of reducing fuel loads, enhancing fire resistant species and structure, and creating early seral habitat. We believe this should be part of the analysis for this project.

How has past management of the Blue Mountain forests shaped the temporal and spatial patterns of vegetation and fuels? What combinations of weather, biophysical patterns, and prior fire history move landscapes towards desired reference conditions or create novel conditions that are further departed? Understanding how past wildfires and past mechanical management activities have modified the effects of fires and stand structure and resiliency is critical to designing a successful project.

Despite the huge number of acres being burned by wildfires each year, there is a lack of evaluation on how fires are shaping landscape patterns relative to reference conditions and future resilience. Without This analysis, managers cannot evaluate the conditions where fires will typically be beneficial or harmful and therefore where to prioritize management actions.

An ecological basis for fuel reduction treatments has been established in dry forest, historically low severity systems. However, this stand-level knowledge has not been scaled up to a watersheds level and put in a larger scale context. Without a clear scientific basis for why treatments are needed to restore or enhance ecological function and resilience across a watershed, it is unclear why so many acres are proposed for mechanical treatment - particularly treatment that involves removing large diameter trees.

We share a goal to manage forests for ecological resilience - the capacity to withstand and recover from fire, insects, drought, and other natural events. Fire is inevitable and necessary in our fire-adapted western forests, and fire is predicted to become more prominent as the atmosphere continues to warm. We believe the Forests should conduct landscape evaluations at the scale that ecological processes like fire operate in order to identify and prioritize actions that restore forest and watershed conditions.

Any actions should involve protecting and restoring populations of large and old fire resistant trees, removing river-polluting roads, relying on managed or natural fire where possible, and creating resilient landscapes. Avoiding new permanent roads and minimizing temporary roads is also critical, as well as maintaining habitat for rare and sensitive species. Increasing the use of prescribed fire is likely cost effective and should be considered on more acres.

Thank you for the opportunity to comment,

Mike Petersen, Executive Director  
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