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Thank you for the opportunity to comment on Blue Mountain Forest Resiliency Project.

The proposed logging and other mechanical "treatments" cover diverse forest habitats that will each be impacted differently, yet the scale of the proposed project (1,270,000 million acres) does not allow for the Forest Service to adequately describe or analyze site-specific or cumulative impacts. Thus, the public's ability to raise issues by evaluating a detailed proposal is limited. The Forest Service must address this by narrowing the focus of proposed activities.

A large-scale project is the perfect opportunity to make on-the-ground progress toward an economically and environmentally sustainable road network. If this project truly aims to make our forests more resilient, the agency must address roads' tremendous impacts to water, fish, wildlife, and ecosystems, impacts that are well documented in scientific literature. This project should identify the minimum road system needed and return unneeded, expensive and deteriorating forest roads to the wild.

Drop from the Project:

* Many forests targeted by this project are mid- and high-elevation, and/or cool and moist, and should be dropped from the project. Restoration activities can be appropriate in some dry forests where past logging and fire suppression have shifted open forests to dense forests. However, mid-elevation dry forests and cool, moist, high-elevation forests naturally support high tree densities and fires of moderate to high severity. Here, forest densities have changed little from their pre-suppression-era condition, and therefore mechanical "restoration" is not needed. High severity fires often have ecological benefits and are the norm in many ecosystems, such as lodgepole pine and spruce-fir forests. While severe fires can be perceived as "catastrophic", severely burned landscapes are neither "destroyed" nor "lifeless" in terms of their ecological integrity.

* Logging in old growth forests -The few old growth forests that remain in the Blue Mountains store large amounts of carbon, serve as refugia for sensitive species, have lower rates of non-native species, and help us understand natural ecosystems.

* Fire-resistant trees should be retained. Medium and large diameter trees are the backbone of wildfire and climate tolerant landscapes.

* Temporary road construction should be dropped from this project. The public often continues to use "temporary" roads long after they have been declared to be in state of non-use. As a result, soil compaction/disturbance and sedimentation impacts persist, as well as impacts to wildlife and the spread of

invasive species.

* Drop from the project activities within intact roadless areas and other roadless areas. Intact roadless habitats maintain species diversity, sequester carbon, protect watersheds, and provide non-fragmented habitat for numerous threatened and endangered species. This project proposes to carve temporary roads and bring mechanical equipment into these rare roadless areas, including the 5,570 acres Tiger Creek Roadless Area in the northern Blue Mountains on the Oregon and Washington border. This area has been identified as vacant bighorn sheep habitat and a site for future herds. Deer and elk winter at the lower elevations and calve at the higher elevations. The area also provides excellent aquatic habitat for native bull and rainbow trout, with cold and clear water flowing through its rivers year round.

Thank you,

Jill Wyatt