

April 5, 2016

Via electronic mail: r6restorationprojects.@fs.fed.us

Blue Mountains Restoration Strategy Team Lead
72510 Coyote Rd.
Pendleton, OR 97801

RE: Blue Mountain Forest Resiliency Project Scoping

Dear Team Lead,

Thank you for the opportunity to comment on the Blue Mountain Forest Resiliency Project scoping notice. The following are the Oregon Chapter Sierra Club and Central Oregon LandWatch's scoping comments on the project. Please include these comments in the official record for this project.

1) Excessive Scope of Analysis Area

At the outset Sierra Club is greatly concerned about this project as scoped because of its enormous scale and the intention of the Forest Service to analyze this project under NEPA in one EIS. Such a large scale results in dilution of the project impacts when they are considered over such a large area. This is illegal under NEPA. *Pac. Coast Fed'n of Fishermen's Ass'ns v. Nat'l Marine Fisheries Serv.*, 265 F.3d 1028, 1035-37 (9th Cir.2001) (holding that an agency cannot try to "minimize" the environmental impact of an activity by simply adopting a scale of analysis so broad that it marginalizes the site-level impact of the activity on ecosystem health). The Forest Service should not analyze the treatments proposed under this project in one NEPA document but rather on a small scale that makes sense with respect to the different ecosystems and communities that will be affected. Further, a NEPA document analyzing such a large area will either be so extensive it will be unmanageable and inaccessible, violating NEPA standards, or it will be too general and not have enough specific analysis to fully determine impacts.

2) Cumulative Impacts

This project will overlap with many other projects and actions that impact the three forests. Cumulative impacts analysis should carefully consider how such large treatment areas, in combination with existing and planned actions will impact fish, wildlife and plan communities. The ability of the project to move forward should be dependent on the results of the cumulative impacts analysis and areas where cumulative impacts will be too great should be dropped from the project completely.

3) Climate Change

Any NEPA analysis for this project should include a robust analysis of the existing conditions and proposed actions in the context of climate change. As the CEQ's recent draft guidance on addressing climate change in NEPA analyses recognizes, "[c]limate

change can increase the vulnerability of a resource, ecosystem, human community, or structure, which would then be more susceptible to climate change and other effects and result in a proposed action's effects being more environmentally damaging.” CEQ, *Revised Draft Guidance for Greenhouse Gas Emissions and Climate Change Impacts* (Dec. 18, 2014), page 22 (Attachment A). The draft CEQ guidance makes clear that “[s]uch considerations are squarely within the realm of NEPA, informing decisions on whether to proceed with and how to design the proposed action so as to minimize impacts on the environment, as well as informing possible adaptation measures to address these impacts, ultimately enabling the selection of smarter, more resilient actions.” *Id.*

4) Wildlife Impacts

Under the National Forest Management Act (NFMA) and its 1982 implementing regulations, “fish and wildlife habitat shall be managed to maintain viable populations of existing native and desired non-native vertebrate species in the planning area.” 36 CFR 219.19. The viability requirement is applied to management indicator species selected and identified by the Forest. For each project, the Forest must analyze the project and its impacts on the population trends and viability of the management indicator species. 36 CFR 219.19. Further the Forest Service must consider Regional sensitive species and species protect under the Federal and state Endangered Species Acts. Any NEPA analysis must use best available science and should include recent and complete species population data. Consultation with US Fish and Wildlife Service may be necessary as this project covers habitat of the Gray Wolf, which is federally listed.

5) Road Density Standards

Any proposed actions should conform to and be consistent with road density standards for the applicable forest. Roads should be at the lowest density that meets long-term resources needs and excess roads should be permanently decommissioned as part of this project. Construction of new roads in Old Growth areas should be avoided.

6) Forest Plan Amendments

Any proposed actions should be consistent the with current LRMP standards. Proposed actions should not require LRMP amendments.

7) Compliance with Existing Law and Regulations

Any proposed action should be consistent with all applicable laws, regulations and guidance, including but not limited to the Clean Water Act, Eastside Screens, INFISH, Travel Management Rule and Plans, Executive Orders 11644 and 11989 and others.

8) Best Available Science

The analysis of any proposed actions should utilize best available science and take a hard look at the environmental consequences of the action. Analysis must incorporate accurate baseline data on site-specific conditions. The Forest Service should use actual data rather than proxies or models wherever possible. Any models utilized should be the best

available and most scientifically accurate. Where the Forest Service does not have sufficient data, the data should be collected before analysis continues.

9) General Comments

The scoping notice and available documentation for this project is very general and does not allow the public to do in-depth analysis or comment. Many, if not all, of the issues raised by the Forest Service in the 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 project planning and implementation, it appears to the public that 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, and 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 project would make learning from mistakes and adaptive management virtually impossible for the project 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 the project 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 generally 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 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. We contest the assertion that the current pace of active forest logging is not keeping pace with forest growth.

Deforestation, which is a leading contributor to climate change, is not just caused 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 project 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. 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

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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.

Thank you for the opportunity to comment on this project. Please continue to provide Sierra Club and Central Oregon LandWatch with any correspondence or notices related to this project. You may send notices via email to mdarzen@gmail.com and paul@centraloregonlandwatch.org.

Sincerely,

/s/ Meriel Darzen

Meriel Darzen
Eastside Forest Committee
Oregon Chapter - Sierra Club

/s/ Paul Dewey
Executive Director
Central Oregon LandWatch

