



BlueRibbon Coalition
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October 28, 2024

Ben Burr, Executive Director
BlueRibbon Coalition
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Jennifer Abernathy, Reviewing Officer
Ochoco National Forest
3160 NE Third Street
Prineville, OR 97754

RE: Objection to the North Fork Crooked River Forest Resilience Project Final EA

Dear Reviewing Officer:

Please accept this formal objection to the Decision Notice and Finding of No Significant Impact (FONSI) for the North Fork Crooked River Forest Resilience Project Final Environmental Assessment, submitted on behalf of BlueRibbon Coalition (BRC). BRC has a longstanding interest in sustainable motorized access to public lands, particularly in areas impacted by vegetation and forest health management. This objection is filed in accordance with 36 C.F.R. part 218, and we request a resolution meeting under 36 C.F.R. § 218.11. For further communication, please contact Simone Griffin at brmedia@sharetrails.org.

I. Interest of the Objector

BRC, a national non-profit organization, champions responsible outdoor recreation, advocating for access to public lands and conservation through collaboration with resource managers. Our members utilize motorized and non-motorized access for various recreational activities, including OHVs, hunting, camping, and wildlife observation, in areas impacted by the North Fork Crooked River Project.

II. Support for Forest Resilience and Wildfire Risk Mitigation

The BRC supports the intent of this project to mitigate the risk of catastrophic wildfire and to enhance forest resilience. The significant wildfires that have swept across Oregon in recent years underline the importance of timely, active forest management. Forest thinning and fuel reduction are crucial for creating fire-resistant landscapes, improving wildlife

habitat, and protecting adjacent private lands. We encourage prioritizing commercial treatment where feasible to reduce excessive biomass and fuel loading, contributing to healthier forests and economic benefits through wood products. In 2024 alone the Crazy Creek Fire due to lightning had dramatic effects on the project area. Nature will cause fires, management will allow them to spread or be contained with minimal damage. It is crucial to understand that the largest threat to the Northern Spotted Owl, its habitat as well as other wildlife and habitat is wildfire that spreads rapidly due to the lack of forest resiliency projects. BRC objects to tree removal only on trees less than 21 inches. Hazard trees need to be removed regardless of size in order to protect the public especially along roads.

III. Concerns with Road Access and Maintenance

The importance of maintaining an accessible and well-managed road system cannot be overstated, both for ongoing forest management and as critical infrastructure for firefighting and emergency response. BRC advocates for maintaining open and adequately maintained roads across the project area. We are concerned with the proposed road decommissioning in Appendix C, which suggests limitations on motorized access, thus reducing the potential for emergency response and active forest management.

In line with our previous comment on the North Fork Crooked River Forest Resilience EA, we reiterate that roads are essential as natural firebreaks and for their utility in enabling rapid fire suppression. Therefore, we request that the Forest Service reconsider plans to close or decommission any roads in the project area, focusing instead on upgrades and maintenance to enhance their functionality as fire barriers and access routes.

Decreasing road density and decommissioning roads should not be part of the scope of this project as this is not travel management. Roads ultimately aid in forest resiliency as they act as natural fire barriers and provide access for forest treatments. Any true negative impacts can and should be mitigated through other methods first and if cannot be the road should be re-routed rather than closed.

IV. Advocacy for Ongoing Monitoring and Adaptive Management

Considering the dynamic nature of forest health threats, including the current tree mortality trends and the spread of invasive species like cheatgrass, BRC encourages a framework for adaptive management. We request that the Forest Service conduct regular monitoring of forest resilience and wildfire risks, with contingency plans to address any emerging hazards, particularly along travel routes. Any hazards should not be used as justification to close routes but should be addressed and mitigated as soon as possible to keep the forest healthy and safe for the public.

V. Inclusion of Science-Based Adaptive Management to Protect Wildlife Habitat

The EA highlights objectives that will improve forest resilience, including the reduction of ladder fuels and creation of open forest conditions for species like the white-headed woodpecker. We urge the Forest Service to implement adaptive management practices informed by real-time conditions, especially in areas where previous management actions, or lack thereof, have led to increased tree density and reduced sunlight to riparian areas.

Conclusion

In conclusion, BRC appreciates the Forest Service's efforts to manage the North Fork Crooked River area to achieve forest health and resilience. However, we urge the Forest Service to prioritize the opening and maintenance of roads in the area, which will support both wildfire management and public access. This will ensure that the public can enjoy these

lands safely while forest health objectives are met efficiently.

Sincerely,
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Simone Griffin
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