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BOARD OF COMMISSIONERS

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DOUGLAS COUNTY

February 29, 2000

Survey and Manage SEIS
Content Analysis Enterprise Team
Attn: USDA Forest Service-CAET
P.O. Box 221090
Salt Lake City, Utah 84122

RE: Draft Supplemental Environmental Impact Statement For Amendment to the Survey and Manage, Protection Buffer, and Other Mitigating Measures Standards and Guidelines.

Dear Enterprise Team:

The Board of Commissioners of Douglas County, Oregon has reviewed the Draft Supplemental Environmental Impact Statement For Amendment to the Survey and Manage, Protection Buffer, and Other Mitigating Measures Standards and Guidelines relative to revising the Northwest Forest Plan. We are submitting the enclosed comments for your review.

As indicated in more detail in our enclosed comments, we are very concerned that the proposed amendment does not maintain the balance that was the foundation for the Northwest Forest Plan. The survey and manage measures were part of a comprehensive program to maintain a balance between late-successional/old-growth forest habitats and forest products, yet the proposed measures place a priority on the survey and manage species and reduce the amount of timber production available from the forests. We recommend that a new alternative be incorporated that reexamines all land set asides to identify additional lands that can be restored to the matrix to offset the survey and manage impacts.

BOARD OF COUNTY COMMISSIONERS
OF DOUGLAS COUNTY, OREGON

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COMMENTS OF THE
BOARD OF COMMISSIONERS
DOUGLAS COUNTY, OREGON

on the

DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT
FOR AMENDMENT TO THE SURVEY AND MANAGE, PROTECTION BUFFER, AND
OTHER MITIGATING MEASURES STANDARDS AND GUIDELINES

1. At the April 2, 1993, Forest Conference, President Clinton set forth a program that was designed to achieve a balanced and comprehensive policy that recognized the importance of the forest to the local economy and the ecological importance of old-growth forests. A key foundation of the Northwest Forest Plan was to provide sustainable timber harvests, healthy old-growth ecosystems, and adequate populations of fish, wildlife, and plants. It was to achieve a balance wherein no one aspect had a higher priority over the other. Unfortunately, by increasing the amount of set asides and reducing the timber harvest for one aspect of the plan at the expense of the social and economic outputs, the "balance" is not being maintained, nor is the plan consistent with the purposes for which the forests and O & C lands were set aside.

When the Northwest Forest Plan was adopted, the sustainable timber harvest level was set at 958 million board feet plus an additional 10% volume estimated in cull and submerchantable material for a total of 1.1 billion board feet (DSEIS p. 291).[1] This volume was a significant reduction from the 1980-89 harvest of 4.524 billion board feet and the 1990-92 harvest of 2.389 billion board feet (FSEIS 3&4-265). Further, the plan reduced the lands available for timber management by placing 77% of the forest in reserves for which no scheduled harvest was to occur. Of the 24 million acres of federal land within the planning area, timber harvest was only allowed on the 16% designated as matrix lands, the 6% in adaptive management areas, or on the 1% set aside into managed late-successional areas. The "balance" resulted in 77% of the forest being off limits to scheduled timber harvests.

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[1]. Since the Northwest Plan was adopted, six of the forests revised their PSQ's (including the Umpqua) to reflect the underestimate of the extent of riparian reserves (and other minor factors). This revision resulted in the PSQ dropping from the 958 MMBF to 811 MMBF (not counting the 10% cull) (DSEIS p. 291).

In addition to these limitations, the Northwest Forest Plan further limited the lands available for harvest by adopting the survey and manage protocol for all land-disturbing activities within the 23% available for forest harvest. Under the survey and manage protocol, all sites with certain rare or isolated old growth and late successional species were to be managed to avoid impacting the species.

An underlying assumption of the Northwest Forest Plan was that the impacts of the survey and manage requirement would be less than 6 MMBF (DSEIS p. 294), and this number was the basis upon which the "balance" of 1.1 billion PSQ was developed. With the modifications proposed in the DSEIS, the preferred alternative would drop the "balance" PSQ of the Northwest Forest Plan from the 1.1 billion down to 695 MMBF (as compared to the 4,524 MMBF harvested in 1980-1989). While implementation of the survey and manage protocols has resulted in a greater impact than projected at the time the Northwest Forest Plan was adopted, the proposed alternative does not seek to reestablish the "balance" but reduces the harvest further. Rather than simply reduce the harvest level further and ignore the social and economic aspects of the "balance," we recommend that the entire plan be reevaluated with greater attention being given to maintaining the social and economic aspects of the "balance." Among the options to reestablish the balance is to re-examine the various buffers and set asides to find additional land for timber production. For example, reducing the 200 foot buffers on each side of Class IV streams would free up substantial amounts of volume and in turn help restore the "balance."

2. The DSEIS states that the purpose of the survey and manage program is to assure viability of species closely associated with late-successional or old-growth forests. By selectively targeting late-successional or old-growth associated species yet only surveying for them in lands that do not have a high incidence of these habitat features, the surveys provide little assurance that species viability is being maintained or even verification that there is a risk to persistence.

While the survey and manage species are selected in part based on the assumption that the reserve system and other standards and guidelines do not provide a reasonable assurance of species persistence, this is simply an unfounded assumption until field surveys in the reserve system provide scientific verification. Due to the impacts of the survey and manage set asides on the social and economic values of the Northwest Forest Plan, we recommend that a priority be placed on surveying all of the reserves to verify the assumption that neither the reserves nor the standards and guidelines provide the reasonable assurance of species persistence.

3. We note that the purpose of the survey and manage requirement was to assure stable, well-distributed populations of rare and isolated late-successional and old-growth forest related species. Notwithstanding this goal, the strategy to achieve it is more onerous than necessary. As a result of the failure to survey for these species in the majority of their habitat - the congressionally and administratively reserved lands - the survey and manage protocol does not provide a scientifically sound method for determining whether the populations are in fact rare or isolated. While landscape level "strategic surveys" have the potential to address this issue, it is unclear whether they will include the reserves and be conducted in a timely manner. We recommend that the final decision require surveys of the set aside areas within a specific time period.

4. While the Record of Decision for the SEIS will not invalidate existing Survey Protocols, we note that several of these protocols expire by their provisions. We suggest to allow a smooth transition that all protocols in place be extended until revised pursuant to the final SEIS.

5. On page 34 of the DSEIS is a reference that the alternatives do not provide every species with a defined minimum level of assurance of persistence since doing so would incur "undue impacts to other objectives of the Plan." To provide for meaningful review and evaluation of the plan, we suggest that these undue impacts be clearly stated in the ROD.

6. Under the section entitled "Concern for Persistence," one of the factors indicating there is little or no concern for persistence is a "high proportion of sites and habitat in reserve land-use allocations." In the absence of surveys in the reserve land use allocations, this would be a difficult factor to satisfy. Since this is a critical factor, we suggest that the reserve sites be surveyed.

7. Furthermore, the criteria set forth in paragraph 6 above erroneously assumes the only way to satisfy persistence of the various species is to set aside additional lands. We suggest it would be more appropriate to examine essential habitat features and manage for them rather than simply rely on reserves.

8. We note the criteria for assigning a species to the "rare" category, is limited to the number of sites or habitat on federal lands. We recommend that this criteria be expanded to include a criteria that examines its full range and habitat covering all land ownerships.

9. Under the proposed alternative the estimated cost of the survey and manage program is $27.6 Million as compared to the no-action alternative of $132 Million. While the preferred alternative represents a significant cost savings, this sum will most likely need to be appropriated dollars or otherwise take funds away from other programs. We suggest further discussion on the impact of this cost to other forest programs be fully discussed in the FEIS.