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February 29, 2000

Survey and Manage Supplemental Environmental
Impact Statement Content Analysis Enterprise Team
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Alfred Wright, Bureau of Land Management
Paul Roush, Bureau of Land Management

Subject: Survey and Manage Draft Supplemental Environmental Impact Statement (DSEIS)

The purpose of this memo is to formally transmit the comments prepared by the Intergovernmental Advisory Committee (IAC) subcommittee regarding the Survey and Manage DSEIS. The non-federal members of the IAC reviewed the work of the subcommittee at the February 3 IAC meeting and agreed to have these comments forwarded on behalf of the non-federal IAC members to the Regional Interagency Executive Committee and the Content Analysis Enterprise Team.

Sincerely,



CURTIS A. LOOP
Acting Executive Director

Enclosure
cc: Non-Federal IAC Members, REO Representatives

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**Final Comments of the IAC Non-Federal Subcommittee on the
Survey and Manage Draft Supplemental Environmental Impact Statement
February 23, 2000**

At the request of the Regional Interagency Executive Committee (RIEC), a subcommittee of the Intergovernmental Advisory Committee (IAC) reviewed the Survey and Manage Draft Supplemental Environmental Impact Statement (DSEIS) on January 26th. A preliminary report of the subcommittee was presented and discussed at the February 3, 2000 meeting of the IAC. This report presents the final comments of a subcommittee comprised of the non-federal members of the IAC resulting from the deliberations of the IAC and comments received through February 10th.

General Comments - Process

Distribution and handling of the DSEIS illustrates continuing problems in involving the IAC in Northwest Forest Plan (NFP) deliberations.

- The process for consideration of IAC input appears to be limited to public comments. The IAC should have a substantive role in helping to craft a recommendation to be presented to the RIEC.
- The document was not distributed to the IAC even though it was available in December.
- Some Provincial Advisory Committees (PACs) were given briefings and others were not. Likewise, some local governments were briefed and others were not. Briefing meetings were held with PACs and are being arranged without notifying IAC representatives. This causes confusion as to lines of communication between PACs, PIECs, the IAC, and RIEC. The Regional Ecosystem Office (REO) needs to implement a process to ensure that the IAC is kept informed of activities occurring within their respective areas of responsibility.
- The RCERT was established to deal with NFP social/economic issues. It appears that no one on the RCERT was asked for input on the DSEIS. RCERT should be involved, particularly when addressing socio-economic impacts of the proposed alternatives.
- The tribes were not involved or consulted during the development of the DSEIS.
- The distribution list for the document is incomplete and inconsistent (e.g., local governments).

Fundamental Issue:

None of the alternatives appears to represent a viable approach to fulfilling program obligations for Survey and Manage (S&M), given limitations of available budgets. The DSEIS fails to address the fundamental issue of what to do with S&M requirements

S767

given the limitations of federal funding available to support the activity. The costs of implementing any of the alternatives greatly exceed the \$8 million currently available for S&M. The DSEIS should explicitly discuss: (a) implications of insufficient funding in light of the new forest planning regulations under consideration which suggest that activities will not be implemented when funding is inadequate; and (b) consequences for other aspects of FS/BLM operations if the S&M alternatives were to be implemented under current budgetary limitations.

The fundamental policy question that needs to be addressed is not which of the alternatives should be supported, but rather *"Do we need a fundamentally different approach to Survey and Manage?"*

- The subcommittee has a general concern that researchers may be approaching S&M from an academic perspective, engineering the S&M approach without consideration for pragmatic and practical constraints. There is a concern that checks and balances are lacking and that policy oversight is insufficient to guide the development of alternatives. There should be some constraints on design of alternatives considering the costs of implementation, the time to implement the program and impacts to other program areas. Are there other strategies to approach the objective of species persistence? Can more efficient survey designs be developed?

Persistence as a goal for S&M

The objective of the S&M activity is intended as a mitigation measure that is intended to provide reasonable assurances of persistence for individual species. Yet, the DSEIS fails to provide quantitative standards to guide interpretation and evaluation of species persistence, particularly with respect to the concept of ensuring that species are "well distributed" across the NFP landscape.

- Pre-disturbance surveys account for from 75%-99% of the projected costs, yet these activities occur on only about 15% of the old growth landscape covered by the NFP. It is not at all clear that any conclusions can be drawn about species persistence under the NFP from pre-disturbance surveys – what distinguishes the matrix lands from others covered by the NFP? The DSEIS fails to explain how S&M strategies that devote the vast majority of available resources to pre-disturbance surveys on old growth matrix lands addresses objectives for species persistence across the landscape of land allocations and reserves established under the NFP.
- The stated management objective of S&M for species persistence does not adequately recognize obligations to tribes with respect to their rights and resources used by their communities. Tribal rights are mentioned in the Environmental Justice section, but the DSEIS needs to improve its treatment of the need to protect resources of importance to tribal communities as part of this program. A criterion should be added to the adaptive management process that requires consultation with the tribes and effects to tribal resources before a

S767

species is removed.

- The DSEIS needs to do a better job of analyzing relative risks to species persistence by alternative. The summaries do not facilitate ready evaluation of what the alternatives accomplish with respect to the risks to individual species.
- The DSEIS gives uneven treatment of impacts on risk to persistence of individual species. Some sections are written more coherently than others. The format for the red tree vole and salamander sections was easier to track than other portions of the effects analysis such as the vascular plants and mollusks.

Incompatibility of Ecosystem Management and Protection of Individual Species

The NFP is ecosystem-based while the S&M activities are species-based. As noted in the DSEIS, in many respects, these two approaches are incompatible. The discussion of alternatives presented in the DSEIS does not adequately address interrelationships between S&M and activities that are intended to improve ecosystem health. All alternatives are acknowledged to potentially delay or eliminate some of these activities, including subsoiling, fuels treatments, and restoration of upland watershed and riparian areas. The DSEIS asserts that such conflicts are inconsequential and would be reduced or resolved through adaptive management, but no supportive analyses are presented. Consequently, the DSEIS fails to reconcile potential conflicts between S&M and other activities anticipated under the NFPs standards and guidelines.

DSEIS Presentation of Alternatives

- The DSEIS attempts to bring all the pieces of S&M together in one document so that program costs, effects to species, impacts on PSQ, and socio-economic effects can be considered at the same time.
- The background section of the DSEIS should include a discussion of the relationship between recent litigation and the proposed action or purpose and need of the DSEIS.
- References to alternatives in the conclusion sections are not consistent with the text.
- The sole use of scientific names in appendices and tables makes the DSEIS inaccessible to the general public. Species should be identified by both scientific and common names to improve understanding.
- The appendices are helpful, but analysis of alternatives is inconsistent and muddled. Some "analyses" appear to be little more than statements of conclusions and lack adequate support as to their scientific basis.
- The description and discussion of alternatives are quite complex and involved. Treatment is uneven with some sections written more coherently than others. A

S767

consistent template for presenting information would facilitate comparison of alternatives.

- It is very difficult to track, compare, and evaluate conclusions and alternatives in the effects analysis in the DSEIS. The lack of clarity of the presentation of alternatives and effects analysis in the document impedes the ability of the public to understand differences between alternatives.

Specific examples of text or diagrams needing clarification:

- Page xxxix. The estimates of jobs supported by timber harvest and timber volumes for the No Action Alternative presented at the top of the page are inconsistent with Table S-3 in that they do not reflect a timber volume reduction for the 1st five years.
- Page 5: Relative Benefits of S&M alternatives to species, bar graph is misleading.
- Page 281: Figure 3&4-4c; white bars don't vary as much as they should. How can sale preparation costs be the same across the alternatives since probable sale quantities (PSQ) changes and some costs are relatively fixed?
- Page 285. The last paragraph contains the statement "Timber sale volumes foregone during the 5-year period would impact 6,570 jobs." The DSEIS does not explain the basis for this estimated impact. Since timber harvest may be delayed by the S&M activity because of fungi protocol surveys, what assumptions underlie the loss of 6,570 jobs?
- Page 287. How were survey and person hours required for S&M activity estimated? The costs in Table 3&4-9 should vary by assumptions regarding hourly rates. Why isn't a range of costs presented that reflects the ranges presented in Table 3&4-10? Instead, the DSEIS strangely appears to presume that the cost of S&M is fixed so that the number of FTPs varies depending upon hourly rates paid to field crews (Table 3&4-11). Is there an analysis that supports the implicit contention that the amount of field work required to conduct S&M activities or the work accomplished by S&M crews somehow varies by hourly rate?
- The criteria used to evaluate and compare alternatives are not presented. The basis for selection of Alternative 1 as the Preferred Alternative is not at all clear.
- The DSEIS does not provide adequate information on the effects of the S&M alternatives on two vitally important areas of ecosystem management, even though potential problems are acknowledged. S&M activities could interfere with the restoration of ecological functions in fire-associated forests in southern Oregon and northern California (see *Effects – Forest Ecosystems*). S&M requirements could also delay or eliminate some management activities that would benefit water, air, or soil resources (see *Effects – Aquatic Ecosystems*).

Adaptive Management

- The DSEIS devotes a substantial amount of effort toward changes of status of

S 767

individual species resulting from the application of categories and classification criteria under the proposed alternatives. However, this approach obscures the fundamental concept of adaptive management that underlies all alternatives.

- A general section on Adaptive Management should be incorporated into the DSEIS since this is the approach that is proposed to minimize the need for future SEIS's for S&M. Currently, each alternative contains a section on adaptive management. These sections are substantively identical except for categories and criteria.
- The concept of specifying criteria to change S&M requirements for individual species is an improvement from the current situation. However, reliance upon qualitative terms in those criteria does little to illuminate the contents of the "black box" of agency science and subjectivity. Vagueness and ambiguity will likely lead to continued uncertainty and spawn future litigation. This concern is heightened by the lack of a process for review/appeal of agency decisions as to changing the categorization of S&M species. Efforts should be undertaken to provide quantitative guidelines for criteria to minimize uncertainty as to intent.

Cumulative Effects

- The cumulative effects analysis (including all actions known or reasonably expected) is insufficient. The DSEIS does not clearly articulate the assumptions underlying the basis for the analysis. Areas of particular concern include: (a) activities on non-federal lands over the last five years have resulted in effects on species that were not factored into the original NFP baseline; (b) the failure to explicitly account for the exercise of tribally reserved rights; and (c) the failure to quantify take of listed species. The final EIS should consider changes to the landscape and environmental baseline such as Habitat Conservation Plans and activities on non-federal lands.

Socio-Economic Effects

- Information on PSQ and S&M costs is presented, but the DSEIS does not contain sufficient detail to support estimates of socio-economic impacts of proposed alternatives. No distributional information was presented in the DSEIS to enable affected communities to better understand the implications of the proposed alternatives. RCERT should have been consulted to obtain information for the analysis.

Criteria for identifying S&M species

- The utility of the second criterion for identifying an S&M species should be reviewed. This criterion relies on species occurrence being associated with old growth. However, much of the discussion within the DSEIS regarding removal of species centers on the observation that the species are not limited to old growth habitats. Just because a species is found in old-growth doesn't mean it is dependent on old-growth. If the intention of the S&M program is to protect species that are only found

S767

in old growth habitats, then the criteria should be changed to be Old-growth dependent.

Clarification of Implications for other Interests or Programs

- The DSEIS does not adequately address interrelationships between S&M and activities such as fire suppression or forest protection. For example, how does survey and manage affect fire suppression efforts or how does it affect the agencies ability to perform fuels reduction treatments or prescribed fire? It is unclear how survey and manage will affect emergency treatments for forest insects and disease. There is a concern that short-term management for S&M might preclude fuels management or other forest health treatments that have long-term ecosystem goals. For example, prescribed fire treatments may affect a survey and manage species that occurs on the site only because fire has been suppressed. The DSEIS should clearly state that S&M requirements will not preclude emergency activities such as fire suppression or forest protection.