

From: [Doug Heiken](#)
To: [FS-comments-pacificnorthwest-deschutes](#)
Cc: [Erik Fernandez](#)
Subject: [CAUTION: Suspicious Link]Visual Analysis Plan Amendments - scoping
Date: Tuesday, January 14, 2020 3:10:38 PM

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Questions: Spam.Abuse@usda.gov

FROM: Doug Heiken, Oregon Wild | [REDACTED]
TO: comments-pacificnorthwest-deschutes@usda.gov
ATTN: Holly Jewkes
DATE: 14 Jan 2020
RE: Visual Analysis Programmatic Plan Amendments - scoping

Please accept the following scoping comments from Oregon Wild regarding the proposed Visual Analysis Programmatic Plan Amendments, https://data.ecosystem-management.org/nepaweb/nepa_project_exp.php?project=57249. Oregon Wild represents 20,000 members and supporters who share our mission to protect and restore Oregon's wildlands, wildlife and waters as an enduring legacy.

This proposed plan amendment would allow recreation planners and environmental coordinators to make decisions normally reserved for trained landscape architects. This raises significant concerns because recreation planners, and especially environmental coordinators are not trained as landscape architects.

The FS has been one of the [foremost employers](#) of landscape architects in the world. Sadly, FS downsizing has reduced the ranks of trained landscape architects within the agency, but the public should not have to settle for substandard design of projects in our increasingly valuable public lands. (To be blunt, with this proposal, the Forest Service appears to be finding untrained "yes men" to approve commercial logging projects in visually sensitive areas of our National Forest.)

Environmental coordinators are not always qualified to serve as landscape architect surrogates. [Qualifications](#) for a Environmental coordinator can be just a 4-year degree in chemistry or agriculture.

If real landscape architects are not available, the FS should ensure that the [minimum qualifications](#) are met:

To begin a career as a landscape architect in the Forest Service, you must meet the following requirements: Have a degree in landscape architecture or landscape design from an accredited college or university, OR A combination of education and experience – for each year short of graduation, the applicant must have had 1 year of experience under professional leadership and guidance of such character and diversity as to be a satisfactory substitute for the required education. This experience must have included original landscape design

We are also concerned that the FS just [recently approved plan amendments](#) regarding fuel reduction and scenic views. These proposals are so closely related that they should be considered in one NEPA document, not segmented in two documents that reduce the apparent cumulative significance.

The FS should not approve this with a Categorical Exclusion. The loss of expertise in planning projects in visually sensitive areas could lead to significant environmental effects and should at least be analyzed in an EA.

Each substantive issue discussed in these comments should be (i) incorporated into the purpose and need for the project, (ii) incorporated into a NEPA alternative, (iii) carefully analyzed as part of the effects analysis, and (iv) considered for mitigation.

Sincerely,
/s/

Doug Heiken, [Oregon Wild](#)

