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Comments: Portland Water Bureau (PWB) relies on the Bull Run Watershed as the primary drinking water supply for nearly 1 million Oregonians.

The forests of the Bull Run play a significant role in the production of a clean and abundant water supply for our customers. The PWB supports an update to the Northwest Forest Plan (NWFP) that improves the conservation and recruitment of mature and old growth conditions for multiple ecosystem functions, including biodiversity, water quality, water quantity, and carbon sequestration.

Moist old growth forested ecosystems, like those in the Bull Run, are fire resistant and resilient. The PWB appreciates the USFS' understanding that techniques for addressing increased wildfire risk due to climate change in forested ecosystems should vary across forest types and be based on the best available science, particularly when it comes to fuels treatment. Fuel treatments may be effective for mitigating risk in overgrown dry forests impacted by fire suppression but may not be appropriate in moist old-growth forests that are inherently productive and only fire prone during rare extreme weather events. Such treatments would result in loss of important ecosystem services, including negative impacts to the quality and quantity of the Bull Run drinking water supply. A large body of scientific research exists on 'west-side' fire ecology and PWB urges the USFS to consider this research, including past work by J. Agee and more recent work by J. Halofsky and others.

The riparian protections within the aquatic conservation strategy of the NWFP are not mentioned as part of the plan amendment. However, the aquatic conservation strategy and associated riparian protections are vital for landscape-scale protection of water quality and salmon habitat, which could be impacted by fuel treatments or other management. The PWB would like to ensure robust riparian protections remain intact in the amended NWFP.

The City of Portland and the Mt. Hood National Forest completed a land exchange in late 2022. That exchange of property in Bull Run involved a forest plan amendment to apply NWFP allocation categories to the land now owned by the USFS. Please make sure to use updated GIS mapping that shows the new ownership boundaries in Bull Run and the associated NWFP allocations.

The PWB is concerned that the proposed timeline does not allow for meaningful stakeholder engagement and urges the USFS to make use of opportunities to extend the timeline to allow for informed and thoughtful stakeholder input on a Draft EIS prior to the document being finalized. In particular, we are concerned that stakeholders have an adequate opportunity to review and comment on location-specific proposed actions.

We appreciate the opportunity to comment and look forward to tracking the NWFP amendment process.