Data Submitted (UTC 11): 9/20/2024 4:25:47 PM
First name: Anna
Last name: Buckley
Organization: Portland Water Bureau
Title: Bull Run Watershed Protection Manager
Comments: The Portland Water Bureau (PWB) is a public drinking water utility that relies on the mature and old growth temperate rainforests of the Bull Run Watershed located in the Western Cascades on the Mt. Hood National Forest for the primary drinking water supply of nearly 1 million Oregonians. Due to foresight by elected officials, staff, and engaged citizens, Bull Run forests are protected from tree cutting and other land use and development activities within a 147-square mile federally designated management unit that is co-managed by the Forest Service and PWB for the primary purpose of water supply. The U.S. Forest Service is the lead agency for wildfire protection in the Bull Run and coordinates closely with PWB on wildfire protection and planning. A majority of the watershed's forests are 500-year old structurally complex, compositionally diverse, highly functioning old-growth forests. The natural fire regime is infrequent but high severity. The fuels in these highly productive forests are usually too wet to burn or they burn severely during infrequent extreme weather events. A large, high-severity wildfire would result in the loss of these old growth forests and, consequently, have significant negative impacts to drinking water quantity and quality. As a result, the current management approach adopted by the USFS and PWB is passive stewardship with an active wildfire prevention, early detection and aggressive suppression program to keep wildfire out of the Bull Run. This is the appropriate approach for these moist old growth Douglas-fir Western hemlock forests where forest productivity is extremely high and fire is infrequent.

PWB supports the management direction for the "stewardship of existing and recruitment of future old-growth forests so that they will be resilient over time" as stated in the DEIS. However, the DEIS management is focused entirely on encouraging "proactive stewardship" of old-growth forests suggesting that vegetation management is needed across all forest types in order to improve their condition and increase their ability to accommodate fires and climate change. While that may be an appropriate management approach for dry old growth forests that historically had frequent, low severity fire regimes that are now overgrown due to 150 years of fire suppression, "proactive stewardship" in the form of vegetation management is not an appropriate approach for moist, highly productive, old growth Douglas-fir Western hemlock forests like those found in the Bull Run watershed where fire is infrequent. Removing the understory and thinning in these old growth forests would alter their structure and species composition creating conditions that don't exist naturally, would require constant maintenance due to their high productivity, result in the loss of important ecosystem functions related to the provision of a clean and abundant water supply and, ultimately, be counterproductive to the stated stewardship objective.

The PWB recommends the following specific changes in the DEIS for incorporation in the final EIS:

1.Explicitly state that a main purpose of the proposed action is to conserve existing old-growth forests.

2.In the beginning of the EIS, distinguish between forests that experience frequent, low severity fires and moist forests that experience infrequent fire. Recommend different stewardship strategies for forests with frequent vs. infrequent fire regimes.

3.In Standard 2.a, add passive stewardship (no active vegetation management) as an appropriate management action for conserving much of existing old-growth forest with infrequent fire regimes.

4.Recommend increased wildfire prevention, early detection and suppression programs as a stewardship action to protect existing old-growth forests with infrequent fire regimes from wildfire given that's their greatest threat (Reilly et al. 2021. USFS Pacific Northwest Research Station. Fire ecology and management: Past, present, and future of US forested ecosystems. Managing Forest Ecosystems. Vol. 39. Springer, Cham: 393-435. Chapter 10. https://www.fs.usda.gov/pnw/pubs/journals/pnw_2021_reilly001.pdf)

5.Clarification with sideboards are needed to better understand what the goal is for Standard 2.c deviation that allows for wildfire risk management objectives within municipal watersheds. Given that Forest Service lands are the largest source of municipal water supply in the U.S., this has the potential to exempt protection for a large area of old-growth forests. The conservation of old growth forests is generally consistent with the protection of drinking water quality and quantity. It's unclear under what circumstances this exemption would benefit municipal watersheds.

6.Include a standard that prohibits vegetation management and fuels reduction work which would contribute to the loss of old-growth structure, composition and ecosystem functions.

7.Require that old trees in old-growth forests be retained if vegetation management is recommended.

8.Require increased training for managers to ensure they have the skills and knowledge for assessing ecological conditions of old growth forests, particularly those forests with infrequent fire regimes.

9.Recommend some level of protection measures for mature forests with flexibility to implement proactive management of moist plantation forests that were previously logged to enhance and to develop old growth characteristics. The DEIS does not address protection for these forests that are key for the recruitment of future old-growth forests.

The PWB appreciates the opportunity to comment and looks forward to tracking the old growth amendment.