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Comments: Thank you for the opportunity to comment on this proposal. As a retired hydrologist who was employed in Region One (Kootenai NF) and the Northwest Oregon Office of the BLM since 1990, I have worked under the conditions set forward in the 1994 Northwest Forest Plan.

While working on numerous types of NEPA projects for both agencies, it was always stressed to us that NEPA requires a "hard look" at all activities that have potential impacts. Based on this history, I find it hard to believe that the 2024 NWFP Amendment does not include any reference of potential impacts to the aquatic environment. Reviewing the 2018 Synthesis of Science document, it is clear that 25 years plus of monitoring have basically shown a neutral or very minor increase in aquatic conditions in managed areas. The report states that the minor changes can be attributed to areas of vegetation regrowth and road decommissioning efforts. Also stated in the report is that all this occurred while only 54% of the actual planned harvest allowed under the 1994 Plan took place. The change in aquatic conditions that occurred have not been sufficient to change the status of listed fish species (which is the goal). The report also states that Federal lands are important source areas of large wood and mixed sediment for streams.

The 1994 Plan components were set up to protect (hopefully leading to improvement) riparian areas and waters. Page 1-12 of the 2024 NWFP amendment states that the proposed activities may affect water quality and quantity but that conditions are not expected to change. Do you feel the monitored aquatic conditions have improved to a level where you think the proposed new harvest activities would require no changes to the ACS to protect or actually improve aquatic conditions over the next 30 years?

Page 3-97 of the DEIS under section 3.7.2.2, Consequences common to all alternatives, does not include any discussion on the new permanent and temporary roads that would be constructed to meet the tens of thousands of acres of new harvest or the millions of acres of burning prescriptions per decade that are proposed across the alternatives. How can you not include potential indirect, direct and cumulative effects to the aquatic resource (ACS) when roads have been identified as the most impactful land management action? To just assume there will be no impact on the aquatic resources because you are not changing the ACS component is wrong, short sighted and does not meet the requirements of NEPA. Because fuels activities would require road access far into the future, the road network would undoubtedly expand possibly even requiring the reopening of decommissioned roads. This would cause a net decrease in the objectives of the ACS. This discussion also needs to be included in the DEIS.

Going back to the 2018 report as it relates to the ACS, it has suggestions for ecologically based management from 3 major scientific reviews which include: 1) Retain old large trees and snags, 2) protect soils against compaction and erosion, 3) protect ecologically sensitive areas, and 4) rehabilitate existing roads and avoid creation of new roads. It appears that all of these items would be in conflict with the alternatives proposed in the 2024 NWFP amendment. This is not to say the DEIS process should not move forward; it just exposes the shortcomings of meeting NEPA objectives by not even including the aquatic resources in the analysis.

Because the USFS has given such specific values of potential harvest and fuels treatment acres per decade in the alternatives discussion, staff probably has a very good idea where these stands are located and what the existing road access is or would be needed to reach your goals. These data should be used to analyze effects to the aquatic resources to give a true picture of the expected impacts. I realize this is a planning document but if the USFS truly wants to look at this level of change in forest activities you cannot just focus on the big picture ecological and social changes while the potential impacts to the aquatic and soil resources could have longer lasting detrimental impacts than the boom/bust cycle of the timber industry.

I bring these items to your attention because the attributes of the ACS while they are an important first step in improving conditions and objectives of the ACS, have not been able to make the desired progress over the past 30 years that was hoped for. All the monitoring has shown is that the impacts from forest activities are real and long-lasting. One would think that since only 54% of the allowable harvest under the 1994 plan occurred that there would have been a robust recovery seen in ACS conditions in many locations across the planning area.

Instead, monitoring has shown that the aquatic resource has barely been able to maintain itself in its already degraded condition. This 2024 NWFP Amendment, while looking to help community and social issues through increased forest management and fuels treatments would almost certainly cause negative impacts on the very resources the public requires to sustain human life, soil and water.