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Comments: I commented earlier, 9 March 2023, on the lack of quality buffer zones I see on this integrated resource project. The only response from the agency was, as usual, to fall back on the expired 2006 Forest Plan. Flaws in the plan and the supporting data / assumptions get ignored for decades or until the plan gets updated, which now looks to be Never.

The problem is that planners chose studies and data to justify the Forest Plan and industrial scale logging. The selection process excluded, as best I can tell, science on buffer zones that called for greater distances from water channels, water bodies, and wetlands in general. When I look up information on buffers to support my own work, I routinely find recommendations for 200 to 300 foot buffers, as minimums. The expired Forest Plan does not even consider buffers beyond 110 feet, unless the slope becomes incredibly steep.

The NRCS published a Riparian Forest Buffer update in 2020 with guidance on practices. ALL of the references in the Code 391 publication are dated after (more recently) than 2006. Additionally, the recommendations for wildlife benefits / habitat / restoration / conservation / range from 50 to 165 feet, well beyond what the GMNF is adhering to. This has been my argument all along, that the Forest Plan has lost relevance and needs more current science, studies, evidence, data, and recommendations. Clearly, the new information is what strong minds and responsible stewards are using as they design projects and mitigate impacts. Outdated documents mean mitigation failure.

Again, the buffer references that I encounter with "biblical status" out of states like Rhode Island and Pennsylvania BEGIN with minimum widths of 100 or 200 feet. Distances are increased for better results or specific considerations. See DeBonnet et al (1994) as one component of collective thinking / study on buffers; the validation is in multiple organizations seeing the need for wider, more viable buffer zones.

The Forest Service Manual (as referenced in the Forest Plan: FSM 2526.03.2 and .5) states that the agency shall: "manage riparian areas under the principle of multiple-use and sustained yields, while emphasizing protection and improvement of soil, water, and vegetation particularly ..." Further: " give preferential consideration to riparian dependent resources when conflicts among land use activities occur." Finally, point 5 calls for: "special attention to land and vegetation for approx. 100 feet from the edges of all perennial streams, lakes, and other bodies of water."

This is so absolutely a clear call to honor water quality. The only room for mis-interpretation is to question the non-mention of vernal pools directly. For the agency to ignore this guidance from the Forest Service Manual is odd; three of four buffer distances charted in the Forest Plan are 50, 70, and 90 feet, and all of those fail to honor the 100 feet called for. Why is that design failure still tolerated? And while the expired Forest Plan details several standards to address wetlands and heavy storm events, it does not address consecutive years of drought. It is easy to call a water channel intermittent when there have been multiple and ongoing years of drought. Drought is a stress situation that should push us toward even greater buffer distances, but it appears the agency simply deferred to the lead priority of resource extraction.

Forest staff need to resolve this stark discrepancy; in no way should there be any riparian buffer zones less than 100 feet wide. I'll even argue for 200 feet to accommodate the NRCS recommendations in support of birds and large mammals.

Thank you.