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Comments: Thank you for providing opportunities for public comment on the Environmental Impact Statement ("EIS") for the proposed revisions to the Northwest Forest Plan.

As a current resident of Bend Oregon originally from San Francisco CA and retired civil/structural engineer (California), I have been volunteering for lands stewardship on the Forest Service Regions 5 & 6 for about 40 years and have enjoyed fishing, hiking, backpacking, paddling and other outdoor activities on the rivers, trails and wildernesses of these Regions.

After reviewing the draft EIS for the proposed Northwest Forest Plan Amendment, I am disappointed and cannot support the proposed alternatives, although I do support the inclusion of Tribal Forest Stewardship to implement forest restoration, enhancements, fuels reduction or maintenance actions, as I have personally witnessed numerous examples of projects that have successfully worked to achieve the stated objectives.

Unfortunately, all of the proposed Alternatives include some level of "[p]roviding a predictable supply of timber and non-timber products…to support the long-term sustainability of communities located proximate to National Forest System lands and economically connected to forest resources" (EIS, p. ES-2)

The problem with this statement of need is that it ignores the environmental costs due to these resource extractions and therefore it is not sustainable in the long-term.

One of the most threatened or endangered species of the Northwest Forest is the many native species of salmon (Oncorhynchus), which are considered keystone species known to supply essential nutrients to forest ecosystems derived from their lives of ocean feeding and subsequently spawning in their native rivers and streams.

"Poorly designed and maintained forestry roads represent one of the most important sources of nonpoint pollution in the landscape. In forestry landscapes of the western USA, road damage to aquatic resources, especially where salmon (Oncorhynchus) run, has been a greater management issue than the damage to terrestrial wildlife. Several key issues affect the protection of fish and fish habitat as well as the recovery of migratory movement patterns by salmon: (1) increase and/or decrease of peak storm-flow levels; (2) concentration of suspended sediment in stream water; (3) extent of fine sediment that covers, or chokes, the gravel important for spawning; (4) alteration of the beneficial effects of streamside vegetation on stream ecosystems; (5) impacts of road-related landslides; and (6) blockage by poorly designed, constructed, or maintained culverts and bridges. Forestry roads have been implicated as culprits in all of these issues, though other factors are also typically involved." (Road Ecology - Science and Solutions, Richard T.T. Forman et al, Island Press, 2003, pp 339-40)

Having personally experienced many examples of the environmental consequences of neglecting the maintenance of logging roads on Forest Service lands, perhaps an appropriate example is provided by the massive landslide that occurred on the HJ Andrews Experimental Forest in February 1996, as described in chapter 10 of The Hidden Forest - The Biography of an Ecosystem, Jon R. Luoma, OSU Press, 1999, pp 175-195.

As a civil engineer with experience in construction management, I believe that all Forest Service timber sales contracts in the Northwest Forest Plan Area must include provisions for decommissioning logging roads as well as plans and specifications for protecting and restoring ecosystems.

Because they have not been addressed adequately by previous Forest Service timber sales contracts, I believe that these issues must be addressed in the subject EIS, which proposes sustainable harvesting of timber on Northwest Forest Plan Area.