



August 22, 2019

USDA Forest Service
Attn: Objection Reviewing Officer
1400 Independence Ave., SW, EMC
Mailstop 1104
Washington, DC 20250

Re: OBJECTION - Regarding the Pacific Northwest Region Aquatic Restoration Project
Submitted at: <https://cara.ecosystemmanagement.org/Public/CommentInput?project=53001>

Dear Objection Reviewing Officer,

The undersigned organization received notice of the U.S. Forest Service's preparation of an environmental assessment (EA), draft Decision Notice (DN) and Finding of No Significant Impact (FONSI) for the Pacific Northwest Aquatic Restoration Project. We submit our objection to that draft decision.

As required by 36 C.F.R. § 218.8(d), the lead objector's name, address, and telephone number:

1. Identification of Objector

The lead objector's name, address, and telephone number:

Marlies Wierenga, Pacific Northwest Conservation Manager
WildEarth Guardians
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Portland, OR 97213
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mwierenga@wildearthguardians.org

WildEarth Guardians is a nonprofit conservation organization with offices in Oregon, Washington and five other states. WildEarth Guardians has more than 220,000 members and supporters across the United States and the world. Guardians works to protect and restore wildlife, wild places, wild rivers, and the health of the American West. Guardians has organizational interest in the proper and lawful management of national forest lands and associated impacts of decisions on wildlife, aquatic species, rivers and wild places across Region 6 of the Forest Service.

1. Previous Involvement in the Pacific Northwest Region Aquatic Restoration Project

Our organization responded to your initial Notice of Opportunity for Scoping and Public Comments by submitting a letter dated January 17, 2018. Our organization submitted comments on the Draft Environmental Assessment (EA) on November 12, 2018. In addition, our organization has tracked and commented on numerous Forest Service projects across the region for years.

2. We support the Forest Service's efforts to improve aquatic conditions across the Pacific Northwest Region.

As was outlined in the “need” statement for the EA and we reiterated in our comments, aquatic restoration on federal lands is vitally important for recovery of listed fish and for improving water quality:

- 24 of the 28 fish species listed as threatened or endangered under the Endangered Species Act (ESA) depend on Forest Service rivers and streams for migration, spawning and rearing
- 6,000 stream miles are designated as critical habitat for federally listed fish (23.4% of the total in Oregon and Washington)
- 5,550 stream miles have been listed as water quality impaired under the Clean Water Act (CWA)¹ – most frequently due to stream temperature not meeting water quality standards.

In addition, 1/3rd of Washingtonians and 1/2 of Oregonians rely on drinking water from rivers and streams with headwaters on U.S. Forest Service lands.

There is an immense amount of work to be done to improve conditions for threatened and endangered fish species as well as meet federal clean water requirements. This is becoming increasingly important as climate change impacts progress across the region. Riparian areas in particular are important for climate adaptation due to their potential to provide cooler areas for species. We believe that the proposed actions can help propel the regional aquatic restoration program forward, as long as adequate safeguards are in place to ensure net benefits. We are happy to see the Forest Service make a region-wide effort to prioritize aquatic restoration and protection.

3. Objection and Remedy: The Forest Service must include system roads, not only non-system roads, for erosion control and decommissioning.

To reiterate the comments we submitted, road decommissioning has repeatedly been shown to have a large positive impact on the condition of a watershed (see Guardians comments p. 2-3). The Pacific Northwest region contains 25% of the entire Forest Service road system causing harm to 78% of the region's watersheds. Yet less than 0.2% of these roads are decommissioned each year. Studies (such as Black et. al. 2017) have shown that road decommissioning, when done smartly and correctly, can reduce sediment input to streams by more than 80%². It is an essential tool that leads to measurable improvements in aquatic resources.

¹ U.S. Department of Agriculture. Pacific Northwest Region. Aquatic Restoration Project. Environmental Assessment. October 2018. P. 1&3.

² Black, T., Luce, C., Cissel, R., Nelson, N. and B. Staab. 2017. Legacy roads monitoring project: GRAIP multi-site synthesis. Presentation. Watershed and Fisheries Program Managers Meeting. U.S. Forest Service, Pacific Northwest Region.

We recognize that non-system roads are often overlooked yet are also a key contributor of sediment to streams and a detriment to natural riverine systems. Just looking at one subwatershed in the region, as an example, the Greenwater watershed of the Mt. Baker-Snoqualmie National Forest. In a recently completed analysis, 22 miles of “non-system” or “user-created” roads were identified – most of which were within riparian areas³. These non-system roads are compacted surfaces, often in the wrong place, and causing significant impact. We support the region’s efforts to restore aquatic areas. Rehabilitating these compacted areas – that weren’t even allowed in the first place – is one step.

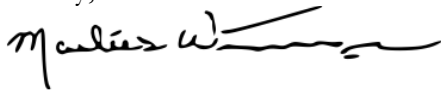
Our concern remains that this is a very small step compared to the need. Only 8 acres of these compacted areas – where non-system roads are - will be restored per year over the next 10 to 15 years (PNW Region Aquatic EA, p. 109). For perspective, Region 6 of the Forest Service manages 24 million acres in Washington and Oregon. Without inclusion of the system roads that may be equally problematic, it remains challenging to meet your regional aquatic restoration goals.

Suggestion: The Forest Service should modify its decision to include system roads in this proposal, specifically those that are identified in a Travel Analysis Report to be “likely unneeded” and causing risk to aquatic resources.

Conclusion

WildEarth Guardians appreciates your consideration of the information and concerns addressed in this objection, as well as the information submitted with our prior comments. We respectfully request to meet with the reviewing officer to discuss these concerns and suggested resolutions. Should you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read 'Marlies Wierenga', with a stylized, flowing script.

Marlies Wierenga
Pacific Northwest Conservation Manager

³ U.S. Forest Service. Mt. Baker-Snoqualmie National Forest. Greenwater ATM. Engineering Report. March 2016.