



Pacific Rivers Council • 917 SW Oak Street #403 • Portland, OR 97205

February 23, 2007

Kevin Birch, Senior Policy Analyst
Forest Resources Planning
Oregon Department of Forestry
2600 State Street
Salem, Oregon 97310
v. 503-945-7405

Re: *Pacific Rivers Council Priorities for Conservation and Recovery of Freshwater Ecosystems on Federal Lands*

Dear Kevin:

You have asked for input on the “most pressing problems” on federal forestlands. We understand that this input will be used by the Federal Forestlands Advisory Committee as it works to identify strengths and weaknesses of federal forestland management, craft a vision for the future, and develop recommendations for specific policy steps necessary to achieve the vision.

We have chosen to limit our list to three items:

1. Federal Forest Roads are a huge, neglected problem and the leading cause of sediment-related degradation to freshwater ecosystems. Vastly increased federal appropriations are needed for decommissioning, renovation and maintenance necessary to meet current resource protection and recovery obligations. Improved criteria for priority-setting at watershed and project scales, and beefed-up-standards for implementation also are needed. Strategic use of resources would target high value watersheds first. If fully funded, bringing federal forest roads into compliance with current water quality and other standards will create thousands of jobs now and into the future.
2. Thinning Treatments Should be Better-Focused to Protect Freshwater Ecosystems, Increase Effectiveness and Reduce Cost and Controversy. Thinning, slash burning and associated activities can pose risks to watershed health and fail to achieve either fire risk reduction goals or forest stand condition objectives. On the westside, least controversy is likely where projects focus on thinning in Late-Successional Reserves for growth release in a single entry, with unneeded and problem roads decommissioned on the way out. For fire management, fuels reduction treatments should be focused in the urban-wildland interface, where existing road networks are generally adequate for access. This focus limits fuels reduction projects to a manageable geography, enables thorough work

adequate to actually reduce fine fuels that exert effective control on fire spread and intensity, and makes a tangible impact on our ability to fight and manage fires in the places where it matters most. We refer you to the recent report by Jonathan J. Rhodes entitled *The Watershed Impacts of Forest Treatments to Reduce Fuels and Modify Fire Behavior* (Pacific Rivers Council, February 2007), available next week at www.pacrivers.org.

3. Reduce Impacts from Grazing and Domestic Livestock Management. Grazing patterns and practices on federal forests continue to prevent achievement of water quality and aquatic habitat objectives, and grazing continues in areas that are inherently unsuitable for livestock grazing, such as wet meadows and riparian areas. Increased federal funding is needed for environmental assessment and monitoring of aquatic ecosystems on grazed lands, and to expedite needed management changes – including retirement of permits -- on allotments in high integrity watersheds and river corridors, including areas most directly connected to the recovery of sensitive native aquatic species. Land management plans should be amended to include adequate forest- or district-wide standards to control grazing impacts on freshwater habitat, and to limit unacceptable cumulative impacts in the many watersheds where logging, high-impacts road-use and grazing occur contemporaneously. Management of wild ungulates should be considered as part of a comprehensive assessment of watershed health and grazing.

Thank you for your consideration of our views. We look forward to continued dialogue with the Department and with members of the Committee about these issues.

Sincerely yours,

Mary Scurlock
Senior Policy Analyst

Chris Frissell
Senior Scientist

cc: Members of the Federal Forestlands Advisory Committee to the Oregon Board of Forestry

Marvin Brown, State Forester
Ralph Bloemers, Crag Law Center
Allyn Ford, Roseburg Forest Products
Chuck Graham, Retired from USDA Forest Service
Steve Grasty, Harney County Judge
Steve Hobbs, Chair, Oregon BOF
Russ Hoeflich, The Nature Conservancy
Bill Kluting, Carpenters Industrial Union
Annabelle Jaramillo, Benton County Commission
R. Wade Mosby, Collins Companies
Zane Smith, Jr., Fish and Wildlife Commission
Ken Williamson, Environmental Quality Commission
Tim Vredenburg, Coquille Indian Tribe
Planning Committee Members