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NORTHWEST FORESTRY ASSOCIATION

May 17, 2000

USDA-Forest Service
Content Analysis Enterprise Team
Attn: UFP
Building 2, Suite 295
5500 Ameila Earhart Dr.
Salt Lake City, UT 84116

RE: Proposed Unified Federal Policy For Ensuring A Watershed Approach To Federal Land And Resource Management

Please accept these comments on the above referenced proposed policy on behalf of the members of the Northwest Forestry Association (NFA). The proposed policy was published in the Federal Register (65 Fed. Reg. 8834 2-22-00). NFA represents primary forest product manufacturers throughout Oregon and Washington. All of NFA's members, to varying extents, rely on federal timber for part of their raw materials. In addition, many of our members own private forestland either surrounded by or adjacent to federal lands. Consequently they are all concerned about policies regarding public land management and the potential effects on private lands.

Under Policy Goals, you recognize that existing programs for watershed assessment are currently being implemented and this proposed policy builds on that. It's good to see this. One of our first concerns was the proposed policy would re-invent the wheel.

The Forest Service and BLM have been doing watershed analysis in the Northwest for several years now. It's called ecosystem analysis at the watershed scale (EAWS). We would strongly oppose abandoning the progress made to date on this work.

However, there are concerns with the existing EAWS and we would expect the unified policy to address these. At the same time, we urge caution not to go to extremes. It's very important that the unified policy result in a cost-effective process. The result must be a timely and meaningful product. Otherwise it would simply be an exercise in futility and a waste of time and money.

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The guiding principles for the two goals in the proposed policy sound innocuous on the surface. But without knowing the details, it's very hard to offer substantive comments. We therefore reserve the opportunity to offer further comments in the future as more details become available.

For instance, the principle "Use the result of watershed assessments to guide planning and management activities in accordance with applicable authorities and procedures" is not clear. How will watershed assessments guide planning and management activities? How is watershed assessment consistent with applicable authorities and procedures? This principle appears reasonable but we must have more details.

Item A under Agency Objectives states "We will develop a common science-based approach to watershed assessment for Federal lands." This again raises the specter of re-inventing the wheel. We do not want to see the work done to date simply dismissed and time wasted trying to develop something new.

Also under Agency Objectives, item A.2.d states "We will use watershed assessments, where available, to protect Federal lands and resources..." (emphasis added). This emphasis on protection is of concern. The emphasis for watershed assessment is, as the name implies, to simply assess the quality of any given watershed. It is not necessarily for the purpose of protection but rather to provide information to the decision making process.

Based on our experience with current watershed assessments, we have some concern about what they really assess. We have always maintained the assessment should focus primarily on the proper functions and conditions of the watershed. What we see instead are measures of proxies such as miles of road. This is not to say road miles ought not to be measured but it's a stretch to correlate road miles in a watershed with proper functions and conditions.

We, in the interior Columbia River Basin, are very involved in the Interior Columbia Basin Ecosystem Management Project (ICBEMP). Part of the supplemental Draft Environmental Impact Statement (SDEIS) currently out for public review and comment is the "step-down process." This process includes sub-basin assessments as well as ecosystem assessments at the watershed scale (watershed assessments).

There are two points regarding this proposed step-down process and how it relates to the proposed unified federal policy. First, we don't agree with the need for so many layers of assessment and analysis. Second, it's not clear how this step-down process will be reconciled with the unified policy. We don't believe the step-down process as a whole should serve as a model for the unified policy.

The last comment regarding the proposed unified policy addresses Agency Objective D.3.b which states "Provide opportunities for interested stakeholders to participate in monitoring and assessing watershed conditions and in implementing watershed restoration projects..." Though this objective is understandable from the point of trying to realize cost savings and buy-in through partnerships, we urge caution.

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This is particularly of concern with regards to the monitoring and assessing. Too many individuals and groups volunteer their time to do this type of work but have little or no qualifications to do so. This must be an objective and credible process based on commonly accepted science. Allowing any individual or group that has time to volunteer does not necessarily lend credibility to the process.

We hope these comments are helpful given what little we had available to review. We trust before this unified policy goes any further, we will have another opportunity to review and comment on the details.

Sincerely,

Charles H. Burley
Eastern Oregon Manager

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