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## Opinion: Forest Service and BLM Threaten Stream Protections in Oregon

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The U.S. Forest Service and the Bureau of Land Management are seeking to eliminate key protections for watersheds, streams and salmon. In 1994, the Northwest Forest Plan (NWFP) allowed federal forest management to free itself from court injunctions. The plan contains an Aquatic Conservation Strategy (ACS) which provides protections for streams and critical support for threatened and endangered salmon.

The BLM and Forest Service are currently revising all forest plans under the NWFP with a goal of increased timber harvests and lower standards for the ACS. We believe this is the wrong direction to take Oregon's federal forests. We urge federal land managers to review a new science report, **Conservation of Aquatic and Fishery Resources in the Pacific Northwest**: Implications of New Science for the Aquatic Conservation Strategy of the Northwest Forest Plan (Frissell and others 2014) and heed its recommendations

For the past 20 years the ACS has largely prevented the decline of streams, rivers and wetlands in federal forests. Scientific reviews indicate the ACS has protected water quality, helped restore stream health and contributed to the recovery of salmon populations.

To understand what would be lost if currently stream protections are weakened one must first know something about the ACS. The ACS contains nine conservation objectives. Each objective addresses one or more watershed processes with a goal of restoring streams and watersheds. For example, the ACS objectives include maintaining and restoring flow regimes, sediment regimes, natural levels of large wood recruitment into streams, and floodplain connectivity to create complex habitats for salmon and other sensitive species. Additional ACS provisions include Key Watersheds, Riparian Reserves, Watershed Restoration, and Watershed Analysis which round out the strategy.

The ACS currently prevents agencies from over-managing watersheds and stream areas through specific standards and guidelines, one of which is that managers "...should not use planned mitigation as a substitute for preventing habitat degradation." This means that the agency is not allowed to cause damage in one place while claiming benefits in another.

It is not hard to see that the ACS employs the precautionary principle that requires managers to make sure that their actions "do no harm". Under the ACS precautionary approach, conditions in all federal watersheds are expected to improve via natural processes and restoration actions over the 50-100 year time frame of the plan. Monitoring to date supports the effectiveness of the current ACS.

The Forest Service and BLM's planning processes aim to eliminate key aspects of the ACS because these protections limit management actions such as timber harvest. Nationally, the Forest Service has written planning guidance that allows forest plans to be replaced by weaker "aspirational" plans with few or no measurable standards. Where the Forest Service has already drafted new forest plans, the goal of "management flexibility" has been achieved by weakening stream and watershed protections.

In Oregon's national forests, which have yet to revise their plans, some managers are already willfully ignoring the ACS standards and proceeding with projects without regard for the ACS or its protective standards. Most notable is the Forest Service's approval of new road construction in the Mt. Hood National Forest. The new roads will support large scale logging and timber salvage in key watersheds, riparian areas, and on highly unstable slopes.

In the BLM's latest round of Western Oregon Plan Revisions (WOPR), BLM managers also appear to be ignoring the NWFP land allocation system and the protective standards of the ACS. In particular the BLM is ignoring the critical direction and guidance for Key Watersheds, Standards and Guidelines for roads and Riparian Reserves, and the overall rule requiring managers to restore all watersheds to meet the ACS Objectives.

Finally, a serious scientific oversight by both land management agencies is their current inattention to climate change. Warmer temperatures and more intense storms will require strengthening and improving the ACS's precautionary approach, not weakening or eliminating it. As streams warm and aquatic systems experience greater stress, it will be even more critical than ever to provide safe, highly intact habitat areas for salmon and other sensitive species.

For a thorough look at the ACS and the science that supports it–download the aquatic science report from the Coast Range Association's website: www.coastrange.org.

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