



October 5, 2006

Survey and Manage SEIS Team
P.O. Box 2965
Portland, Oregon 97208

Dear Messrs. Haske and Christensen:

The Society of American Foresters, representing over 15,000 professional forest managers, scientists, and consultants in all sectors of employment, is pleased to offer comments on the *Draft Supplement to the 2004 Final Environmental Impact Statement to Remove Survey and Manage Mitigation Measures Standards and Guidelines (DSEIS)* as requested in the July 7, 2006 issue of the *Federal Register*. SAF is committed to ensuring the continued health and use of forest ecosystems and the present and future availability of forest resources to benefit society through sustainable forest management.

SAF continues to support the change made in the 2004 Record of Decision (Alternative 2 in the DSEIS), to remove the Survey and Manage Mitigation Measures Standards and Guidelines (subsequently referred to as Guidelines) from the Northwest Forest Plan and instead rely upon existing species conservation programs of the agencies for those species in the Plan area not listed as threatened or endangered under the Endangered Species Act.

The conservation of species whether or not they are endangered or threatened is critical to the overall health and sustainability of forested ecosystems. However, because both the Bureau of Land Management (BLM) and the USDA Forest Service (USFS) have mandates that require them to provide for the economic, ecological, and social values associated with forests, species protection must be balanced with other values, rather than “trumping” these values. The Guidelines went above the legal mandates of the agencies and have had the affect of limiting the provision of other forest values in the process, conflicting with legal mandates of the National Forest Management Act and the Multiple-Use Sustained Yield Act. The Guidelines also conflict with the very principles of sustainable forest management, placing emphasis on one value above the others which will ultimately limit the sustainability of the system.

The Guidelines were originally intended to provide for “additional benefits to species while maintaining the balance between late-successional and old-growth forest habitats and forest products.” SAF recognizes the good intentions of the Guidelines, however, subsequent experience and evaluation has demonstrated that they have hindered achievement of the Northwest Forest Plan’s original goals. For example, the Survey and Manage Final SEIS 2000 estimated that upon implementation, the probable sale quantity (PSQ) would be reduced by 51 million board feet per year,

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when in actuality the PSQ was reduced by twice this amount. In addition, Guidelines can prevent the Agencies from moving forward with projects that will help restore or maintain forest health, reduce wildfire risk, and maintain wildlife habitat and waterways.

The DSEIS provides additional information to support removal of the Guidelines from the Northwest Forest Plan, incorporating new information on species in the Plan area as well as correcting issues with the assessment of acres needing hazardous fuels reduction treatments. It also provides additional information to help with the mitigation measures in the preferred action, Alternative 2.

Alternative 2 supports multiple use management, thus embracing the original intentions of the Northwest Forest Plan and the intentions of Congress in the Multiple-Use-Sustained-Yield Act of 1960 and the National Forest Management Act of 1976. Alternative 1, no action, is not acceptable in light of these mandates and existing programs. Though Alternative 3, modifying the Guidelines, would be an improvement over the existing circumstances, we believe Alternative 2 with the mitigation measures would best address the issues and help to achieve the original goals of the Northwest Forest, and maintain sustainable forests and sustainable communities. We strongly urge implementation of Alternative 2 without further delay.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael T. Goergen Jr.", with a stylized flourish at the end.

Michael T. Goergen Jr.
Executive Vice-President and CEO