Fwd: Comments concerning the BLM's Trail Creek Forest Mgt. Project. Attention: Jean Williams and Jon Raby

1 message

MD_Mail, BLM_OR <blm_or_md_mail@blm.gov> Wed, Apr 10, 2013 at 9:08 AM
To: Jean Williams <j5willia@blm.gov>

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From: [redacted]
Date: Wed, Apr 10, 2013 at 6:03 AM
Subject: Comments concerning the BLM's Trail Creek Forest Mgt. Project. Attention: Jean Williams and Jon Raby
To: "Trail Cr. For. Mgt. Proj." <BLM_OR_MD_Mail@blm.gov>

The following are comments concerning the BLM's Trail Creek Forest Mgt. Project. Attention: Jean Williams and Jon Raby:

First:

About "**Regeneration Harvests**":

Yes, the BLM is governed by its **Resource Management Plan** (the RMP)(http://www.blm.gov/or/plans/wopr/rod/files/wopr_medford_RMP.pdf), but nevertheless I have searched that document for the term "regeneration harvest" to see, if I am able, what that term specifically means -- in addition to seeing what the scoping document stated it means, which was, "minimum number of retained trees varies from 6 to 25 green conifer trees per acre greater than 20 inches DBH (diameter at breast height)."

I see that the RMP indicates the remaining trees in a timber cutting unit, after a "regeneration" cut is done, may vary, depending on the circumstances.

However, I very emphatically object to the use of "regeneration harvests" (that is regeneration "cuts" rather than "harvests"). I object to them because, more often than not, they amount to nothing more than virtual clearcuts! As you stated in the scoping document, there may be as little as only 6 trees per acre remaining after a regeneration cut is done. So..., please, STOP THE REGENERATION HARVESTS! They are unacceptable.

There is nothing more OXYMORONIC and ORWELLIAN than the term "regeneration harvests." One does NOT regenerate a stand of trees by CUTTING VIRTUALLY THE ENTIRE STAND! The use of the term is simply NONSENSE!

I believe it is alright ("OK") to "thin" timber stands if the tree canopy overstory is maintained "closed," or relatively so, so sunlight does is not able to easily reach the forest floor to promote growth of brush and to dry out the soil. Granted, with the forest tree canopy remaining closed, there is an increased potential for stand clearing "crown fires." But, I ask you: What is the risk of crown fires, if the understory is clean and clear of brush and dead limb ladder fuels? Answer: "Relatively small, compared to a stand of tress which has an open canopy and much ground fuel and ladder fuels."

Secondly:

Regarding Regeneration Harvests vs. Watershed Water Production and Wildfire: Nothing in this world is "for sure," so it is better NOT to diminish watershed water production by ***regeneration harvest*** timber cutting.

About **Trail Creek, itself:** As I am sure you BLM people are aware, the Trail Creek watershed is already severely degraded -- because of previous timber cutting and road building. And because of that, **in addition to the extremely over-appropriated out-of-stream water rights by the State of Oregon**, the summertime flow, especially in the middle and lower reaches of Trail Creek, almost without exception, **decreases each summer to virtually nothing**. As a consequence of those things, the now normal late summertime situation of the creek is that there exists only a very few isolated stagnant pools in those middle and lower reaches. That situation is, of course, lethal to the juvenile salmonids which inhabit the creek during the summers -- including the juvenile coho which are "listed" as "threatened" under the Federal Endangered Species Act -- the "ESA." (The mouth of the creek at the Rogue River dries up before any other part of the creek dries up, and the juvenile salmonids in the creek therefore become trapped in the creek, and then they die.)

Legally, under the Federal ESA, it is unlawful to do anything to those threatened species themselves, or to **their habitat**, which kills them. And... that is exactly what degradation to the watershed (by virtually clearcutting timber -- i.e., "regeneration harvests") does to those juvenile salmonids in Trail Creek -- it kills them! (See the U.S. Supreme Court decision of Babbitt vs. Sweet Home at http://caselaw.lp.findlaw.com/cgi-bin/getcase.pl?court=US&vol=000&invol=U10269)

Therefore, I maintain that your proposed actions, which will further degrade the watershed, its ecosystem, and its production of streamflow, by way of your using the "regeneration harvest" method of cutting timber, **will be illegal**, based on the "threatened" listing of the coho salmon juveniles which inhabit the creek during the summers.

(Incidentally, For Your Information, I also maintain the State of Oregon, itself, is in violation of the Federal ESA because of its permitting of out of stream water rights, which contribute to the mortality of those "listed" coho salmon. But I haven't been able to convince the National Marine Fisheries Service people that they should strictly enforce their ESA along Trail Creek.)

To substantiate my contention that logging, in general, and especially Regeneration Harvests of timber, diminished the water production of watersheds, I offer a research paper concerning timber cutting and summertime stream flows. It is titled "**LONG-TERM CHANGES IN STREAMFLOW FOLLOWING LOGGING IN WESTERN OREGON AND ASSOCIATED FISHERIES IMPLICATIONS**." It is found on the Internet at http://www.wou.edu/las/physci/taylor//g473/refs/hicks_etal_1991.pdf.

Notice the last paragraph of that paper's Abstract states:

> **"Low streamflows during summer have implications for salmonid survival." Reduced streamflow reduces the amount of rearing habitat, thus increasing competition. Combined with high water temperatures, reduced streamflow can lead directly to salmonid mortality by driving salmonids from riffles and glides, and trapping them in drying pools. Low streamflow also increases oxygen depletion ... ."**

That is what is now already happening in Trail Creek each summer, and the proposed "regeneration" cuts will exacerbate that situation.

And, **Lastly, but not least of all:**

Your first two objectives listed in you initial scoping document,

- "Supply a sustainable harvest of forest commodities (i.e., timber) from matrix lands...",

and

- "Restore ecological characteristics and sustainable conditions in the forests and landscapes in the watershed,"

are **diametrically opposed** to each other, on matrix lands. You can't do both on matrix lands, or anywhere else, for that matter. Therefore you will be, in reality, destroying ecological characteristics on those matrix lands, and in general for the watershed. Because of that **fact**, this "Forest Management" Project proposal will **generally further diminish (degrade) the Trail Creek watershed and its production of streamflow,** especially if you go through with the "regenerational harvests," which are, most emphatically, UNACCEPTABLE.!

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