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**MEDFORD DISTRICT OFFICE
BUREAU OF LAND MANAGEMENT**

BLM
BUTTE FALLS RA
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SCOPING COMMENTS TRAIL CREEK FOREST MGT PROJECT
04/29/13

Please accept my Scoping Comments on the new Trail Creek Forest Mgt Project.

1. GENERAL EA FORMAT

A. Purpose and Need

The purpose and need should be clearly developed in concert with objectives that define what is ecologically sustainable and how management plans will act in accordance with this.

B. Project Objectives

Are some listed Objectives in conflict with each other (ie Objective 1 in conflict with the other 5 objectives)?

Alternative 2, may not fulfill bullet points 4 and 5 given the history and present condition of the watershed and project area

The EA should have project objectives that clearly identify the desired future condition of the land.

C. Issues and Indicators

Each Objective must have clearly stated issues and indicators by which the effectiveness of meeting the objectives may be measured.

D. Alternatives

The range of alternatives presented should compare ecological effects of each alternative action as well as for the other objectives listed. A complete analysis of the environmental effects must be delineated for each Alternative.

Watershed Analysis

According to the NWFP, Watershed Analysis will serve as a basis for developing specific project proposals. Therefore, this project should incorporate the findings in the WA. However, the WA was written over 10 years ago and, while generally accurate, needs to be updated as to current levels with regard to roads, hydrology, fish etc. Since the EA for the 07-02 was written, the project has taken place. Therefore, total impacts on resources are probably much greater than were those described in the WA. An EIS would reflect this updated information.

E. Issues to Be Addressed

1. Cumulative Effects Analysis

Please provide a Cumulative Effects Analysis of all influences, including public and private timber harvest, that could affect stream and riparian degradation. How will the current project affect this Watershed in light of historical impacts, including past projects

on private and BLM land in Trail Creek and neighboring watersheds such as East Evans and Elk Creek?

This watershed shows a highly fragmented landscape due to past private and federal forest management projects. The most recent of these projects is the completion of 2002 EA Trail Creek project in 2012. Comparisons of proposed units for this current project and those from the 2002 EA show many of the same sections being entered with adjacent units in this project to those from the ones proposed 12 years ago. This impact, combined with private water withdrawal, extensive road building and vegetation removal (both upland and riparian) could indicate significant effects on water, fish and soils and wildlife.

As stated in the WA, the impacts of past BLM logging and road activities on the hydrological and terrestrial health of the Watershed must be thoroughly analyzed along with the additional impacts expected from this current proposed project. Cumulative impacts of ORV use, trash dumping, road/stream crossings, and habitat fragmentation associated with the existing BLM transportation system are significant.

Historical soil erosion throughout the watershed should also be analyzed with regard to sediment load in streams. Please provide a complete monitored inventory of the results of the 04-12 project. What is the present condition of the land that was logged at that time? How did that project affect the streams, Peak Flows, Base Flows, fish etc.?

An EIS is required because of the cumulative effects of past impacts and future projects. The agency must consider the effects of the proposed action in the context of all relevant circumstances.

2. Road Density

Like much of the Butte Falls RA, this watershed has a very high road density. According to the WA-pg 1-5 "*Stream crossings are numerous and road mileage adjacent to streams are common. As a result, road systems are the dominant source of delivered sediment within the watershed*". No new roads should be constructed for this project, permanent or temporary. Temporary roads are not really temporary. They leave a permanent footprint on the land. Depending on the soil types, decommissioning temporary roads can still leave a permanent footprint. Temporary roads are often reopened if new activities are planned. Roads near streams do need to be decommissioned to lessen the extreme sediment load on streams. What is the current status of all roads on WA Map Figure 3-7 listed as abandoned or closed? The new status needs to be included in the upcoming NEPA document.

OHVs have created new roads that are not in BLM inventory. This issue should also be addressed.

3. Timber Harvest

(a) Regeneration Cuts

It is important to reconsider these given the degraded condition of the watershed.

- They expose the soil to intense sunlight, thus drying it and making it less productive
- Plantations replacing the forest are fire and disease prone and demand continuous maintenance.
- The 02 EA proposed numerous Regeneration Cuts. These cuts do not regenerate the forest, but create a brushy landscape that takes years if ever to regenerate. The Map I received for this project did not label the different types of timber harvest actions. Therefore the places for these proposed cuts is unknown. Please provide complete unit information (text and maps) concerning proposed timber harvest actions.
- Please report in an EIS the condition of the units in which Regeneration Cuts were done in the 04-12 project.

(b) Upper Diameter Limits are needed. The emphasis in this project should be on small diameter thinning and cutting from below. An upper diameter limit of 20" would insure that the few remaining late successional forests would be retained.

(c) Ground Based Yarding (tractor) is destructive to soils and the forest ecosystem in general. This type of yarding should be minimized. Please justify the reason for this type of yarding other than flat slope. This has had intense impacts in the past.

(d) Riparian Thinning The overstory canopy is extremely important in Riparian areas. Trail Creek streams already have according to the WA an extreme "shade deficit". Riparian thinning can be destructive as it removes the shade canopy needed for protection of streams and soils. It also reduces future snag and down wood development. Stream "no cut" buffers should be 150ft as given in ACS standards. Standing trees dead and alive should be retained to fall into the streams rather than cutting trees down to place in the streams. This would insure a continuous shade canopy for the stream as well as leave an inventory of wood to fall into the streams. Planting Alder and Willow along stream banks might help this process.

Keep heavy equipment out of the riparian Zone and decommission roads by streams to limit sediment delivery. Rhodes & Purser(1998) *Forest cutting in Riparian Areas is particularly detrimental.*

A complete map of Riparian Reserves is required with inclusion of areas of soil instabilities. How will timber harvest effect this? Riparian reserves cannot, at present, fully protect streams from mass erosion involving large amounts of sediment delivered to the stream channel via debris flows or slumps from logged areas.

(e) Late Successional Habitat is scarce in this watershed. We don't need more harvest of large older trees in Upland areas or Riparian Reserves where there is already a deficit. An example of this is R1W-33S-Sec 9/10. New adjacent harvest is planned near where Regeneration Cuts were done in 04-12. What is the status of these areas now? Were plantations done? What is the status of those? Instead of taking more old larger trees, concentrate on thinning plantations and other small diameter material. This will reduce fire risk as well as provide jobs and economic incentives.

4. Soils

Unit descriptions of the various management actions and soil types need to be provided. Many problem soils exist in the watershed. WA-pg 1-5 *Deep seated slumps and earthflows are common in the Trail Creek Watershed and again are associated with the clay rich soil formed from volcanoclastic parent materials that underlie the entire watershed.* This may or may not cause problems with timber harvest but do affect road construction and accelerate the erosion process. Repeated entries with new roads could increase stream sediment. The Trail Creek soils present complex problems that have been minimized in the past. The TPCC limited stand data needs to be brought up to date and presented in the upcoming document.

Please discuss in detail the general soil types in the watershed and their limitations with regard to timber growth, production and road construction.

In light of soil issues, please consider what effects the extensive past ground based yarding, will have on the land from this project.

A good slope map is needed. The one in the WA needs more detail. The map needs to determine critical slopes for ravel and colluvial movement. Slopes of 70% were identified but the scale was so small it was hard to read. Benchy terrain needs to be identified for possible landslide deposits, landflow deposits, or other slope drainage concerns. Also, erosion risk maps based on geology, land forms, and effects of past land use need to be updated in the WA.

5. Hydrology

Please discuss in detail the reasons for the degraded conditions of Trail Creek mainstem and some tributaries. The mainstem has an extreme widened channel, lack of pools, woody material and is cut to bedrock. According to the WA a "high shade hazard was noted in almost all streams" indicating the lack of Riparian vegetation and high stream temperatures (especially in the mainstem). Please provide a current evaluation of the hydrologic condition of all streams in the project area to update what is in the WA. How will the proposed project affect Aquatic conservation? Will ACS standards be met and how?

TSZ - Part of the project is within the TSZ. How will that affect Peak Flows and Base Flows in a watershed where streams are already dry earlier each year? The last project also had actions in this zone. How did that affect Peak and Base flows. What is the condition of the land since that part of project was completed? If new Regen cuts are planned in this area, how will that affect Peak flows from ROS events and further road degradation and stream sediment.

6. Fish

Please update all studies on Coho, Rainbow, Sculpin, Redside Shiner, and Klamath Sucker to current levels with regard to numbers of each species, where located, and survival at the location where found. Many fish are being lost due to high stream temperatures and other seasonal water quality limitations that accompany loss of hydrologic function during the summer and late spring. How will this project affect these waterways and fish populations that are already stressed? How will increased sediment loads from road building and timber harvest affect them?

7. Wildlife

(a) Northern Spotted Owl- This species requires at least 60% canopy cover for nesting and 40% for dispersal. This is the bare minimum and the canopy cover should be actually at least 70%. Three of the management projects in Alt 2 will not fulfill this requirement. Reduced canopy cover results in habitat fragmentation. The maps of the Critical Habitat units in the WA need to be updated. According to the WA there were 10 active NSO areas. The suitable owl habitat map from the WA show that the management plan is in conflict with retaining these areas free from harvest or close enough to drive them away. The 02 EA showed Regeneration cuts in some of these areas. Please update the information as to the status of these areas.

(b) Northern Goshawk- A bureau sensitive species that will be affected by a reduced forest canopy-please update the present status and map it.

(c) Closed Canopy Dependent Species

The pacific fisher, All Bats, Western Bluebird, Pileated Woodpecker, Del Norte Salamander may all be affected by reduction of forest stand structure, canopy closure and/or snag density in planning area. Impacts on these species must be addressed

(d) Neotropical Birds are in decline in all habitats due to habitat loss. Southern Oregon is no exception. Precautions must be taken and seasonal restrictions applied on project activities to protect these populations.

8. Fuels Treatments

Please present a complete fire plan with justification and activities for each location. This should include historical information about the 04-12 project. What were the results of those treatments?

Discuss a plan for slash removal and clean up after current planned harvest.

Discuss the effects of plantations on fire risk(from Regeneration Cuts and subsequent plantings).

Please offer a complete description of the fire plan for this new project with regard to slash disposal, broadcast burning, underburning etc).

Why are fire projects being planned where there a few roads and no timber harvest? ie TWP 33S-R1W-Sec 21, 28, 18, 1? Fuel hazard reduction should start closest to homes and the wildland urban interface along roads and move inward from there. The firewood cutting could accomplish some of these goals if it is properly supervised.

In conclusion I would suggest expansion of small diameter thinning from below as offered in Alternatives 3 and 4. Leave as much overstory as possible for shade, wildlife, retention of soil moisture, and reduction of fire risk. Projects such as meadow restoration, quarry decommissioning, and Riparian road decommissioning are commendable.

Thank you for your consideration,

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