

Fwd: Fw: My comments concerning the BLM's February 2014 Trail Creek Forest Management Project Environmental Assessment (the "EA")

1 message

MD_Mail, BLM_OR <blm_or_md_mail@blm.gov>
To: Jean Williams <j5willia@blm.gov>

Wed, Feb 12, 2014 at 11:36 AM

Jean--

Please share w/ Jon's acting FM. Thanks

----- Forwarded message -----

From: **Fred Fleetwood** <waterrat1@exede.net>
Date: Wed, Feb 12, 2014 at 10:08 AM
Subject: Fw: My comments concerning the BLM's February 2014 Trail Creek Forest Management Project Environmental Assessment (the "EA")
To: "Williams, Jean" <BLM_OR_MD_MAIL@blm.gov>

Jean,

Today is not my day, I guess.

I mailed the message below to BLM_OR_MD_MAIL@blm.gov, and I received a **failed delivery** notice for it. I see I put an extra "underscore" where I shouldn't have. So I changed that address to BLM_OR_MD_MAIL@blm.gov. I'll see if that works this time.

Fred

----- Original Message -----

From: Fred Fleetwood
To: Raby, Jon, BF Field Mgr ; Williams, Jean
Sent: Wednesday, February 12, 2014 8:38 AM
Subject: My comments concerning the BLM's February 2014 Trail Creek Forest Management Project Environmental Assessment (the "EA")

From
Fredric ("Fred") L. Fleetwood
4261 Hwy. 227
Trail, OR 97541

Wednesday, February 12, 2014

To:
Jon Raby
Field Manager
Butte Falls Resource Area
Medford District BLM
3040 Biddle Road
Medford, OR 97504

To:

Jean Williams
Butte Falls Resource Area Planning and Environmental Coordinator
Medford District BLM
3040 Biddle Road
Medford, OR 97504

The following are my comments concerning the BLM's February 2014 Trail Creek Forest Management Project Environmental Assessment (the "EA").

The official copy of this message, containing my hand written signature, is being sent to you via Certified U.S. Postal Service Mail with a Return Receipt Requested.

My primary interest in the Trail Creek Sub-Watershed has always been the "salmonids" (steelhead trout and coho salmon) and the other aquatic life which inhabit Trail Creek and its tributaries. Thus, the portions of the EA on which I focused my principal attention are those which pertain to those fish (**especially the juveniles** of those fish) and their habitat.

The main (principal) activity proposed for this particular Trail Creek Forest Management Project is tree/timber cutting, therefore I focused on that tree/timber cutting activity's effect on those fish's principal and most immediate habit -- **"their" water!**

I am guided by the following principle:

When tree cover of "a" forested watershed is diminished, more water comes off off/from the watershed during the winters and less comes off during the summers, thus diminishing summertime baseflows -- that is, if there is any summertime baseflow remaining to be diminished.

Since the ownership pattern of the Watershed is broken up into BLM (41.60%), Forest Service (12.32%), Timber Companies (28.01%), private (17.85%), and State (0.22%), the BLM does not have much control over the overall management of the watershed.

So, that being the case, and since the Watershed is already in such bad shape (i.e., environmentally degraded), what little the BLM can possibly do to improve the condition of the water will (unfortunately, and in actuality) be of little overall **IMPROVEMENT**, as far as the watershed's water quantity is concerned.

HOWEVER, I do believe the BLM will further degrade the Watershed by its Trail Creek Forest Management Project. I believe it will do that by the tree/timber cutting activities it intends to pursue! My opinion is that the tree/timber cutting activities **will worsen the already very poor quantity and quality of the summertime base steam flows**. (You're probably asking yourself, "How can that be the case, when there already is no more water quantity to decrease? Well that's true, but the project will just make that terrible situation more difficult to correct.)

That brings me to the question and the two paragraph response to it, which is found on page 110 of this EA. The response acknowledges the bad environmental condition of the Trail Creek Watershed, but it ignores and denies the effect the BLM's commercial "tree/timber cutting" activities will have on the watershed's stream network's water flows.

That question and response to the question are:

How would the proposed projects (which are mainly tree/timber cutting) affect water quantity?

Water quantity is of concern in the Trail Creek watershed primarily because much of the main stem

habitat is dry throughout most of the summer, creating low or no flow conditions in sections of stream that are dominated by bedrock. Water withdrawals, both permitted and unpermitted, diminish the volume of aquatic habitat as well as the quality.

Proposed Trail Creek Forest Management activities related to commercial timber harvest and yarding operations would not be hydrologically connected to the stream network and, therefore, would not increase peak flows or negatively modify summer base flows.

I believe that second paragraph of the response to the question is a **subversion of the truth** -- it is, **patently false!**

It is false because of the following two reasons:

1. The "... much of the main stem sections ..." of the creek which are "dominated by bedrock," as the BLM dutifully and accurately describes it, are of course, **not** the places in the creek where the spawning of the salmonids take place. **Of course salmonids do not spawn on bedrock!** The places where those salmonid activities take place are in the middle and upper reaches of the creek, where there is spawning gravel available to them.

And...

2. The harvest and yarding operations themselves may not be hydrologically connected to the stream network while they are happening, **but the after-effects of those operations once they are finished will certainly be connected later to the stream network!** Those after-effects will quite possibly make the poor wintertime water quality even poorer, and make the summertime lack of flows even harder to correct. Diminished tree canopies allow sun to get to the forest floor and dry out the soils more quickly and thereby make the diminished summertime lack of water flows (which already exist in Trail Creek) happen earlier in the season. The net effect would be to further degrade the Trail Creek Watershed and the habitat of the salmonids which inhabit its creek and tributaries.

Section **4.2.1 ESA Consultation**, found on page 104 of the EA, describes the process of ESA Consultation, **but nowhere does the EA actually state** (as far as I am able to determine) that the BLM **has actually consulted the National Marine Fisheries Service** on how the project may affect the listed (as threatened) coho salmon of Trail Creek.

But, according to Section "**4.2.1.3 T&E Fish**," found on page 105 of the EA:

"The Trail Creek Project Area contains one T&E fish species, the federally threatened Southern Oregon/ Northern California coho salmon. The project fish biologist determined the actions proposed in this project would have

no effect on coho salmon, coho critical habitat, or essential fish habitat; therefore, consultation was not required."

Note that the text in that paragraph is "The project fish biologist determined ..."

So thus, the only one who has apparently made the determination (that the Trail Creek Forest Management's commercial tree/timber cuttings will have no effect on the Southern Oregon/Northern California listed (as threatened) coho salmon, on their critical habitat, or on their essential habitat) is an employee of the BLM's Butte Falls Resource Area itself.

Therefore I hereby formally request the Butte Falls Resource Area to actually do the required consultation with the National Marine Fisheries Service on this matter.

Fredric L. Fleetwood