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03/03/14

To Jean Williams and ID Team:

Please accept my comments on the Trail Creek EA for 2013.

#### **I PURPOSE AND NEED**

Trail Creek is a fragmented watershed with high road density, hydrologic challenges, critical habitat disbursements and repeated impacts on marginal soils. An EIS should have been done for the entire watershed before the planning of the 2003 forest management project. This would have included a complete analysis of the entire watershed and all management projects including this present one. It would have included a complete Cumulative Effects analysis, issues and indicators for management on the site specific and watershed level, and a recovery plan for the entire watershed. Instead, piecemeal projects are offered with little regard for the effects on the whole. Tiering to the RMP is correct in the legal sense but does not pin point the specific issues for this watershed's specific issues with indicators about how they would be addressed. Since there were no actual Objectives for this project listed as such, I will address the categories as presented. Please consider doing an EIS for this entire watershed that includes assessment of effects on the NSO and other sensitive species.

#### **CUMULATIVE EFFECTS**

While the historic data of management in the watershed was presented in all categories, there was limited information on how this management affected flora and fauna in the parts of the watershed subjected to the changes that were outlined. Except for lowering the soil nutrient levels in Regeneration Cuts, the general condition of the land was not addressed. Instead, it was assumed that the thinning projects proposed would make remaining trees grow faster and improve the quality and quantity of wood for the future. Impacts on all forest systems working together were not discussed (forest regeneration, wildlife, streams, fish habitat). No reference was made concerning the affect that the 2003 project has had on the landscape and how this current proposed project will combine with that in a site specific sense and the watershed as a whole. The fact that certain sections are being entered multiple times (even though in different places) in a short period of time shows we must look at the effects on everything and not take each project separately. A broader cumulative effect could have also been addressed connecting the landscape level of other 5<sup>th</sup> Field Watersheds such as East Evans with Trail Creek.

## II PROJECT OBJECTIVES

These were not listed as such. Simply tying to the RMP ignores the fact that there should be overall project objectives for each phase of the project with issues for each objective and indicators how they will be implemented in an ecologically sustainable way. The Project Design Features while dealing with specific methods of implementation do not really show this. The following seem to fit the Objective Categories.

### A. Forest Management and Timber Harvest-Design and implement timber sales on Matrix lands in Trail Creek 5<sup>th</sup> Field Watershed.

1. Production of Revenue. This is the main purpose and driver for this project to support local and regional economic activity. According to the RMP the lands that meet the minimum stand age for the North and South GFMA could be Regeneration harvested on Matrix lands. Even though that won't be done for this project, what would be the ecological consequence of if it were to be done and how would it be mitigated (or would mitigation not be considered)?
2. Reduce densities in stands less than 100 years old that have a more simplified structure with limited layers present in order to control stocking levels and reduce growth to fewer but larger trees. Commercial thinning is proposed for this. The condition of the landscape as a whole must be considered-not just the trees apart from the landscape ie: streams, wildlife, soils etc.
3. Maintain or enhance forest health, stand structure and function in stands identified as NSO habitat. This could be ecologically destructive since this species thrives best when left alone in large, densely forested areas. Leaving these areas with as large a forested landscape as possible seems the best plan to insure species survival.
4. Reduce tree densities in stands less than 150 years old on matrix lands to increase landscape resiliency to environmental disturbances. Small diameter thinning should be done aggressively. This will increase the health of the stands and decrease fir danger. However, I would reduce the age of leave trees to 100-120 years old depending on the size of the tree. There is no mention of Upper Diameter Limits of trees to be harvested. Logging large trees should be discouraged since there is a shortage in the watershed. Upper Diameter limits of 20" DBH should be considered.
5. Maintain stands less than 80 years old on developmental paths to achieve desired stand characteristics in the future. Precommercial thinning should be done aggressively to reduce fire danger and promote growth of the healthiest trees. Some hardwoods should be left to increase stand diversity. Try to avoid single age and species composition.
6. Improve individual tree and stand health, reduce risk for catastrophic wildfires and restore ecosystem functions to riparian reserves. While this is a site specific issue, Riparian reserve logging can be detrimental to the streams and can cause silting and damage to sensitive ecosystems. While thinning Riparian plantations could be a positive outcome for reduced fire risk, logging mature and native forests in these areas will not be positive. Limit Riparian cutting to what can be done by hand and yarded out by equipment located outside the Riparian area. All roads in this area should be decommissioned. Major haul routes through Riparian zones should be stabilized and decommissioned after project completion in favor of new routes that do not involve these areas. Riparian canopy closures should be 70%. Buffers for streams are too small. They should be 100.

7. Aid in reforestation of areas proposed for Regeneration Harvest. Since young stands predominate in this watershed, there should be no need for this type of harvest. Decadent trees are a positive feature for wildlife. Cutting diseased trees might be more likely to spread the disease since many forms of root rot can spread through infected stumps. Regeneration cuts from the 2003 project should be carefully monitored and the results noted before these new cuts take place.

According to the WA3-41 if Regeneration Harvest is to be done, it should be done at the lower elevations where late successional connectivity is not an issue. This project plans these some of these actions in higher elevations that are NSO Critical Habitat and have been entered before. (335-1W-21)

#### **B. Roads and Road Work**

The road density in this watershed is extremely high. The WA shows that "roads are the single greatest source of management related sediment in the watershed". "...road surface erosion increased sediment delivery by 80% and exceeded 100% for the Upper East Fork sub watershed". An important part of the project is located in this area-3251W-19/21. The WA also mentioned that sediment delivered by roads is greater than that delivered by Mass Wasting. The marginal soils on which many of these roads are built contributes to this problem. WA recommendations for control of sediment delivery should be considered-pg 4-12-13.

##### **1. EA Road Objectives**

a. Reduce potential for sediment production on up to 80 miles of roads that would be used to haul harvested timber....Restore or improve roads to the desired standard in a manner that minimizes sediment production and water quality degradation. The desired standard condition is not mentioned although the WA states 1.5 mi/sq mi is the recommended standard. The current active road density in the watershed is 4 mi/sq mi. How this will be accomplished is also not mentioned.

b. Decrease the possibility of sediment entering streams by closing or decommissioning 1.4 miles of roads surplus to BLM at this time. This is much too little and implies these roads could be opened up later. All roads in the Riparian Zones should be decommissioned or closed. These closures should be permanent. Long and short term transportation needs could mean no temporary road closures because timber harvests are continuing in this watershed.

c. Provide temporary vehicular access to proposed harvest units on BLM administered lands in the project area that are not accessible by existing roads by constructing 6 mi and reconstructing .8 mi of temporary routes. There is really no such thing as a *temporary route* as it establishes a new foot print that can be reused. This will add to the road density.

d. The ROD/RMP (p 28 and 157) directs roads to be located to minimize soil erosion, water quality degradation and disturbance to riparian vegetation by minimizing road locations in riparian reserves and locating roads on stable positions such as ridges. This is another reason to eliminate roads in the riparian zones.

## 2. General Road Density Problems

- a. Displacement of wildlife sensitive species by increasing forest edge effect.
- b. Proliferation of Noxious Weed species
- c. Access to human trash dumping-often near streams
- d. Increased rates of soil instability and silting of streams
- e. Helipads are better than roads but there are too many in this project

Decommissioning unneeded roads and minimizing new landing construction is a must.

### C. OHV Use

This is becoming an extreme problem in all watersheds. Trail Creek is no exception. The high road density that has been established contributes to this problem because it creates a road system that off road vehicles can use to form new trails. These unauthorized trails maximize the road density problems already present such as mentioned in various parts of the WA. BLM is to be commended for recognizing this problem and attempting to deal with it. This will not be an easy job.

### D. Fuels Treatment

Various methods and lands are involved in reducing fuel loading in the project area. These are shown on the maps. Some of these are necessary in the Wildland Interface. However, it is questionable that there is so much land that will be managed in this way. The extreme road density contributes to this problem. Thin from the roads inward so that most of the activity will be near the roads. Use of controlled burning could be useful. Shredding of slash, when possible will provide nutrients to soils that burning takes away. Do not treat areas away from roads. The firewood cutting area, if properly supervised, could contribute to reduction of fire risk. Slash created by harvests must be dealt with the first winter.

### E. Special Projects

These are important projects that need to be done.

#### 1. Stream Habitat Restoration

If done properly this could be valuable for the area. It was not clear if seedlings would be planted on land that was cleared in the past or if land would be cleared for this project. Watershed restoration as described in the ACS standards may or may not be applicable to this project. The implementation of the project itself is not a cause for concern except in Alt 2 there is a Commercial Thin planned on either side of the stream with a Riparian Thin near the stream. This could damage the stream and add to the sediment created by the project. This section-325-1W-19 is a problem area that has been entered in the 2003 sale in a different place. The Upper Trail Creek Subwatershed has a number of problem areas. They are close to or within the TSZ which means they could be subject to Peak Flows even though the EA disputes this. Unfortunately, we did not get to see much of this part of the watershed on the tour because we were running late.

2. Water source restoration-This is an important project that will be helpful.

3. Meadow Restoration-Be careful of broadcast burning and soil depletion. Consider retaining thickets for wildlife if possible. Some brush pockets are good habitat for birds and small animals.

4. Quarry Reclamation (Romine Creek) this is an excellent idea. In my comments in 2002 I addressed problems with this quarry. I am glad it is being reclaimed. I did not see any quarries marked on the map. Where is the rock coming from for the roads in this project?

The NEEDS section will be addressed in various other parts of these comments to which they pertain.

### III ISSUES AND INDICATORS

A. Forest Condition-How can BLM promote the growth and vigor of overstocked forest stands and reduce potential fire hazards in the Project Area? The assumption is that all stands selected for harvest are over stocked. Reducing stand density should consider the age and size of the tree and well as the stand density. Older trees provide values to the forest such as fire protection, shade and soil conservation. Reducing stand density in young plantations and early seral forests is a positive thing that also decreases potential fire hazard. Snags can be good for wildlife and general forest health.

B. Fragile Soil- This will also be addressed under SOILS. Can BLM implement ground-disturbing activities in the Trail Creek watershed on suitable commercial forestland considered fragile for mass movement while minimizing impacts to those fragile soils? Mass wasting and slumps are not the only soil problems in the watershed. . "As was noted in previous sections, soil productivity in this watershed is relatively low for timber production. TPCC further depict extensive timber productivity limitations due to fragile soil and/or reforestation problems." (WA-3-31).

Tractor yarding also contributes to soil problems. It could cause sediment flow and similar problems that roads cause.

C. Sediment from Roads-Can BLM eliminate road-related sources of sediment in the Project Area? BLM is attempting to deal with this problem by restoring the roads and ditches planned for use. This is an acknowledged problem. Building new Temporary Roads and decommissioning them will make this problem worse. There was no discussion about mitigation measures that will work and be permanent. (see under roads)

D. Northern Spotted Owl Habitat(see under NSO)-Can BLM implement forest management projects on matrix lands in northern spotted owl habitat without harm to an individual owl? There have been no solutions presented for this. The population is declining due to human activity. If we really want to save the species we must provide enough territory for their needs to be met.

E. Economics-How can BLM provide an economical timber sale while maintaining healthy, diverse and productive ecosystems? This is a difficult question because the two goals are often incompatible. Many of the lands in Southern Oregon do not reproduce forests at the same rate that those in the north do. We are going now into areas that have been deferred and are sometimes marginal. (see Economics)

#### OTHER ISSUES(NOT ANALYZED IN DETAIL)

F. Special Status Species- These surveys should have been completed before this document came out. The ROD for the project is not a deadline that the public can be made aware of and comment on. "No treatment" buffers are not always enough when the ecosystem is changed.

G. Migratory Bird Species-Migratory Birds are in decline everywhere, not just in this watershed. Seasonal restrictions may not be enough protection. The fact that the Trail Creek Forest Management Project will follow the US Fish and Wildlife Service mandates for conservation **where feasible** is another way of saying other parts of the project have priority.

#### I. Coarse Woody Material

Snags and down logs build soil and provide important habitat critical to recovery after disturbance and in fish bearing streams. The WA goes into depth about the degraded condition of the Main stem of Trail Creek and other streams. These are primarily "related to a history of direct channel disturbance and management practices that have led to depletion of LWD(large woody debris) followed by loss of gravel substrate and habitat diversity elements". The recommendations on pg 4-17 also indicate "ground based yarding on or near fragile soils can also create problems in partial harvest areas. Retain as much LWD as possible". BLM is currently trying to implement some of these recommendations.

J. Can BLM thin riparian reserves and meet Aquatic Conservation Strategy (ACS) objectives? (this will be addressed under **Riparian Thin**) There are assumptions that BLM is making when discussing implementation of this part of the project that may or may not be true.

#### K. How does timber harvest affect trees greater than 30" DBH?

Appendix C was complete as far as it went. However, even though it addressed the age of the tree, it did not address size directly. A tree 30" DBH should not be cut unless it is a hazard. BLM admits that they don't know how many large 30" DBH trees will be cut. This is important because of the low volume of large trees in the watershed and past practices of saying no large trees would be cut when they were. If two large trees are close to each other both should be retained. Some large trees will be in a state of decline and they should also be retained as snags or future snags.

#### L. How would the proposed projects affect Northern Goshawk?

The seasonal restrictions and proposed buffers are not enough. This species like the NSO requires solitude and quiet.

#### M. How would the proposed projects affect water quantity?

If riparian logging releases peak flows during the wet season, flows in the summer could become less. Riparian zones are actually part of the stream network.

N. How would the Trail Creek Forest Management projects affect the TSZ?

According to the EA, not enough of the Upper Trail Creek Watershed in in the TSZ to cause peak flows. Lots of work is being done in these sections so it remains to be seen what the end result will be.

O. How will logging slash in the timber harvest units influence potential wildfire behavior prior to slash clean-up? Some of this could be used for coarse wood in the streams. Log and scatter would be an immediate solution until a more permanent one can be found.

P. Would the proposed projects affect fish and fish habitat? Because of the degradation of the Trail Creek Main stem the water dries up during the summer leaving juvenile Salmon stranded. This is not due to the project but is an issue to be considered when removing vegetation from Riparian areas. Past mismanagement has made the situation in the Mainstem critical.

Q. Would road densities be reduced?

It is commendable that BLM is decommissioning some of the roads. However, temporary roads are being built which, if constructed, would increase the footprint on the land. The average road density would only be reduced by .1 mile. This is better than increasing road density. However, there could have been more decommissioning done.

R. Pacific Connector Gas Pipeline

If this is in fact built, it will destroy the watershed and the Rogue River Coho fishery for many years into the future. An EIS would be necessary as the entire watershed plan would change.

#### IV PROPOSED PROJECTS AND ENVIRONMENTAL EFFECTS

##### A. TIMBER

###### 1. Forest Stands proposed for treatment

a. **Plantations**-if soils and sites permit-thin aggressively. This will also reduce fire risk. Log and scatter slash

b. **Mixed conifer stands**-residual from the 1960s harvest. Thin to a 40% canopy but retain the largest trees

c. **Mixed conifer closed canopy stands**-leave everything over 120 years old or larger than 25" DBH.

(1) Because young stands are predominant in the watershed, please consider using **upper diameter limits** of 25" DBH so as many larger trees in the watershed will be retained.

(2) Consider retaining **snags** and decadent trees as part of the mix for wildlife and returning nutrients to the forest.

(3) **Stand Density**-there was extensive discussion throughout the document about high stand density and not much emphasis on age class or size of the trees being discussed. When reducing stand density, age class and size should also be considered.

## 2. Harvest Practices

Old large trees must be retained regardless of other factors. The methods described in the EA pg 5 should be considered. Prescribed under burning and clearing less dominant trees and brush surrounding large trees will reduce fire risk as well as release soil nutrients and moisture for use by larger trees. Shade is of utmost importance. Open canopies dry out the soil and initiate the growth of brush. 40%-60% canopies are too low especially in NSO areas. Thinning from below should take precedence over thinning the overstory. It has been shown that the undisturbed forest is the least fire prone because of shade and retention of soil moisture (DellaSala and Frost-2000). Avoid shaded fuel breaks. They fragment the forest and will only work if constantly maintained.

a. **Regeneration/Shelterwood harvest** should have no place in these current forest plans. This practice is unnecessary in a watershed where early seral stages predominate. Plantations are fire prone and soils dry out. This creates an "edge effect" that influences the surrounding landscape. The few large trees that are retained are not a forest and even though healthy at harvest time, may not survive over the years. Plantations are also competing with grass and brush species which make up the early seral component that needs to be aggressively managed. The drought conditions of the Southern Oregon summers exacerbate this problem.

b. **Density Management and Commercial Thinning need** more closed canopies. 40% canopy closure is too low. 50% or 60% should be considered depending on the carrying capacity of the land.

c. **Restoration Thinning** with small unthinned patches could be a more natural way to restore the forest. This is a relatively new practice being used by BLM. However it has been under discussion for a number of years. Again consider upper diameter limits and well as age class for retention. Moving toward retention of Pine species reflects the dryer climate that Southern Oregon is moving into.

d. **Small diameter Thinning and Precommercial Thinning** should be done aggressively as these stands are fire prone.

### e. **Riparian Thinning**

Riparian thinning should be done only to remove small diameter trees less than 8" DBH. The EA states that conifers up to 20" would be removed. Trees of this size enhance the Riparian zone, hold soils and provide shade. 50%-60% canopy cover is too small in the riparian area. The canopy in this area should be about 70%. NSO habitat should be avoided. Stream buffers are too small and should be about 150' from the stream. Roads in the Riparian area need to be decommissioned and no heavy equipment should be brought in. Small diameter trees could be felled by hand and hauled out by skyline yarding with equipment located outside the Riparian buffer. Yarding corridors would be decommissioned after operations are complete.

(1) **Stream buffers**-The WA states that "almost all stream miles in the Trail Creek Watershed have a high shade hazard. Shade is required to maintain stream temperature below 64 degrees F. for survival of fish.

(2) The **sediment load** which travels through Riparian Reserves is also high due to road density and past management. Please consider restricting Riparian harvest to small diameter trees or dropping these units.

### 3. Yarding Methods

a. **Ground Based Yarding**-There is a lot of this type of yarding in this sale because of slopes being less than 35%. Slope is not the only criteria for tractor yarding. Other criteria include but are not limited to, slope shape(convex or concave), soil texture and abruptness of changes in textures, soil drainage, topographic shapes, soil depth, mineralogy, parent material and porosity. The Soils section reflected the criteria of slumps or mass wasting. This is important but it is only one of many criteria. This type of yarding is bad for all soils and should be minimized. The feller-buncher technique is a vast improvement over the traditional tractor. Hopefully this will be used rather than the tractor. It was not clear how much of this project would be done with the feller-buncher and how much would be done by traditional tractor-crawler.

b. **Skyline yarding** involves the use of skid trails. It would be good to have full suspension of these logs as this works on steep slopes and these trails can damage soils and act as conduits for water and flooding. These should be decommissioned after use.

c. **Helicopter**-This method is the least damaging to soils and the ground. However it is expensive. Alt 4 avoids building new temporary routes but relies on helicopter use. This generates less money from the sale but is the best ecologically.

## B. WILDLIFE/NSO HABITAT

The Wildlife appendix of this EA was very disappointing. It was merely a list of the various species without any explanation of how they will be affected by the management plan.

### 1. NSO sites

In the Affected Environment Section-chapter 3- the NSO sites were discussed in detail. Large sections of NSO habitat will be entered for various activities under this plan. According to the EA CH 3 PGS 86/89 the project that is going into NRF habitat in all Alternatives is **likely to Adversely Affect** the species. This is unacceptable for a species that is already in decline.

Seasonal restrictions would be inadequate protection because this species is sensitive to noise and general human disturbance that would be caused by project activity. Juvenile owls are very vulnerable for longer periods of time and do not fly. Maturity comes in a few years. This species is in decline because of human disturbance and habitat loss. The Barred Owl threat is a symptom not a cause of habitat degradation.

This underlines my earlier statement that no Regeneration or Shelterwood harvest be done in this project. Likewise, Fuels Reduction should be unnecessary in this habitat which encourages retention of large older trees. Shade canopies encourage soil moisture retention and resistance to fire.

The fact that the fire wood cutting area goes through NSO critical habitat is problematic. The general public should not be allowed to collect firewood anywhere near NSO sites. The firewood cutting area should have been located on a road more in the southern part of the watershed.

## 2. Connectivity Blocks/Forest Fragmentation/Cumulative Effects Cont.

This project continues the forest fragmentation of the 2003 sale. Many current activities will continue to take place in owl cores. Both connectivity blocks meant to provide connectivity through a fragmented landscape will be impacted. A complete analysis on the effects of the 2003 project on the landscape and how this project will add to the cumulative effects is necessary to determine the true condition of the watershed as a whole. Despite the general historical cumulative effects information presented, the site specific information about specific results of the implementation of the last sale should have been presented in this EA. How will the fact that multiple entries into adjacent parts of certain sections affect the NSO and other wildlife?

## 3. Other Species

The only mitigation measure discussed for these and plant species was buffering. Buffering may not work well when the ecosystem itself is changed.

- a. **Red Tree Vole**-listed but no information about protection of mitigation measures
- b. **Northern Goshawk**-There was no mention of this important species in the wildlife section. It was discussed in Appendix A. It is also listed in the WA-APF though the "level of surveys" were listed as limited. Nothing was included about declining populations. This is another sensitive old growth closed canopy species that is an important forest health indicator which is known to be present in the watershed. There is not enough protection for this species.
- c. **Neotropical Birds** have been discussed earlier in these comments. Seasonal restrictions may not be enough to protect them.

## C. SOILS

The Soils Appendix was an improvement over what has been presented in the past. The maps in Chapter 3 were also helpful. The fact that problems were actually looked at on the ground rather than a "fly over" was also a large improvement over the past.

### 1. Problem Areas

- a. **Section 325-1W-19** is still a problem with a mixture of soil types and lots of activities taking place.
- b. **Section 325-1W-21** also has some problem soils (Straight/Shipa) and there are Regeneration units planned for this section. I did not have enough information to completely analyze this section but parts of it look marginal (showing past slumps etc).
- c. **Section 325-1W-29** shows parts of it are subject to raveling-unstable areas are recognized in Appendix D-Table d-1 where according to the chart, Tractor yarding was planned on "stable" slopes. Even though stability is currently present, the fact that other unstable areas are close could create future reforestation problems.

d. **Section 335-1W-10 Morine Creek**- There were multiple Regeneration cuts planned for this section in 2003. Now there is Density Management planned in between two past Regeneration cuts with Tractor yarding. Soils are Geppert-subject to raveling. No mention was made about the results of the 2003 Regeneration cuts in this section and how they and future harvest will influence the landscape.

e. **Section 335-1W-15** Problems with this unit are recognized. These units are part of the proposed berry Creek wilderness Characteristics unit. If this area is truly to be a wilderness, no more management should take place there, especially with problem soils.

f. **Section 335-1W-7** There is not only Tractor yarding but Commercial Thinning planned for this area in Alt 2. A new temporary road is also going in. Soils are marginal-these units and roads should be reconsidered.

g. **Section 325-1W-33** Buffering active slumps does not guarantee the ground will remain stable after management activities have taken place. The main road will be renovated but you are starting with unstable ground.

The fact that management activities will take place in areas where soils are unstable is disturbing. Again, because of multiple entries into these sections, it would have been helpful to have an assessment of the results of the harvest activities completed from the 2003 project.

## 2. Roads

Again it was found that roads were the predominant cause of increase in mass movement of soil. This will make a difference when considering not only yarding, but when ripping and decommissioning roads. The fact that stable areas were found near unstable areas should not be a reason to go ahead with project plans as the entire area could be unstable.

3. Ground Based Yarding. It seems that ground based yarding will continue (even with the improved feller-buncher) on slopes less than 35%. The fact that certain areas were checked for slumps and few were found is meaningful but were other soil factors considered ie clay content(pyroclastic)? This could make a difference when ripping and decommissioning roads.

## D. STREAMS

### 1. General Degraded Stream Condition in the Watershed

The degraded condition of the streams in this watershed is acknowledged in both the EA and the WA.

It was also discussed in my 2002 comments. I have no information about the effects on these streams from the 2003-2012 project. According to this EA the project area contains 43.7 mi of water quality impaired streams. Reducing stream buffers from the Riparian Zone boundary for riparian thin units could increase sediment loads. Road work and decommissioning in Riparian areas could also add to this load in the short term. However, if the decommissioned roads are not used again, this problem could be fixed in the long term.

2. TSZ- The EA does not see problems with peak flows in the TSZ. Parts of two sections are located in this area-325-1W-19 and 325-1W-21. These sections were also entered in the 2003 project and there is lots of activity planned for section 19. New units are adjacent to the old ones.

3. Upper Elk Creek Only 1 map showed this subwatershed in the EA even though the literature referred to it several times.

#### 4. ACS Watershed Restoration

a. Riparian Reserves-Building roads into these areas as has been done in the past will not fulfill ACS objectives F1.4. The stream project in 325-1W-19 is an attempt to correct past damages. However, the Riparian thin and commercial thin in Alt 2 could have a negative on the restoration process. Regeneration harvest in section 21 could contribute to more run off. Stream buffers for Riparian Thins are too narrow. They should be at least 100' from the stream.

##### b. Activities that may or may not prevent the project from meeting ACS objectives.

- (1) Equipment and skid trails in the Riparian zone
- (2) Decommissioned roads in the short term (but necessary for long term stability)
- (3) New Temporary Roads built and decommissioned (better not to build them)
- (4) Regeneration harvest in sections that have been entered within the last 1-8 Years
- (5) New helipad construction when there are existing ones close to harvest activity
- (6) Assumption that the Riparian Reserves would continue to grow large conifers in the long term after harvest may or may not be true
- (7) Drought conditions and changing weather patterns from Climate Change make long term effects unpredictable.
- (8) Road work and other activities could spread Noxious Weeds.

#### E. FISH

The Assumptions pg 220 (first bullet point) about private land activity continuing to be a problem is valid.

Therefore, Federal agencies need to be as vigilant as possible when protecting fish habitat.

1. The Trail Creek 5<sup>th</sup> Field Watershed is an important fishery for Coho Salmon and other species. Salmon and trout habitat has declined over the years. Elevated sediment from logging and road building has contributed to this in a major way. New information from the SONNC Coho recovery plan (NMFS-2012) indicates that this Species is at a higher risk of extinction than previously assumed by the Medford District RMP and WA.

## 2. Riparian Reserves Transportation

The EA Appendix I indicates that BLM is attempting to make sure the road system is adapted in such a way as to minimize sediment delivery to streams. However, the 21 miles of unpaved road through Riparian Reserves is of concern. Even though BLM has no jurisdiction over private lands, BLM might try to coordinate with private landowners and other stake holders to improve their part of the road system to keep sediment under control. Seasonal restrictions are helpful but dust can fall on sensitive areas even in the dry season and remain until the winter storms wash it into the streams. The riparian reserves are a buffer against this but will not do their job if activities such as log hauling and harvesting continue within them. Reconsider Riparian thinning. Ground based equipment will create sediment in the dry season that will wash into stream channels during the rain.

## 3. Other Unfavorable Conditions-WA

- a. Limited spawning gravel
- b. Main stem channel widened and cut to Bedrock (WA)
- c. Lack of Coarse Woody Material
- d. Temperature up to 80 degrees in Main stem when it should be 64
- e. Shade deficiency (WA 3-26)
- f. Refugia not properly documented (EA June 2002-AP F)
- g. Off Channel habitat not properly functioning-EA 2002-AP F/ODF&W Aquatic Habitat Inventories
- h. Low Flows in the main stem contributing to loss of up to 90% of juvenile Coho and Steelhead.

## 4. Historical Disturbance Factors-WA

- a. Past and present timber harvest
- b. Removal of Riparian vegetation
- c. Agricultural conversion
- d. Private Irrigation Use

## 5. Further Considerations

- a. Identify fish migration barriers for both juvenile and adult Coho. The project in 325-1W-19 is an attempt to do this. BLM could also try to coordinate with other stake holders to provide passage.
- b. Investigate private illegal water diversions from Federal land.

## 6. Fuels Treatment

There are conflicting interests here. The removal of vegetation and ground disturbance in the short term can leave loose soil and create sediment that ends up in streams. However, it is necessary to have fire prevention. Riparian thinning will probably be good for fire prevention but could decrease the water holding capacity of the soil thus contributing to the decrease in base flows.

## 7. Conclusion/Assumptions

Much of the information that was present in the 2002 EA was missing from this one. The ACS information in the current EA makes the assumption that the current project will have no effect on ACS objectives, streams of fish. The critical habitat decline and new information from NMFS-2012 make it imperative that current management plans be reviewed. While a number of stakeholders with various priorities exist, the overwhelming evidence shows a continuing degraded landscape. Many of the current projects show a step in the right direction. However, the continued stress on our public and private lands from commercial extraction will eventually lead to depletion unless we figure out a way to reverse the process.

## F. BOTANY

### 1. Special status /S&M vascular plants

a. There was no discussion of **short term effects** on S/M and vascular plants. It was assumed that thinning the landscape will benefit these plants in the long term. This again assumes that buffers work as planned and they survive into the long term.

b. **Buffering** the plants from harvest activity may or may not protect them because the ecosystem around them has changed even with the buffer. Closed canopy species would be the most affected. This is another reason to eliminate Regeneration Cuts that will change the landscape drastically.

c. **Trees in the mature seral stage** should be a priority for retention  
In this watershed which is lacking in this stage of development, it would have been helpful to know the number of trees over 30" DBH would be cut in each unit.

### 2. Nonvascular Plants

Buffering may or may not protect these plants that exist in certain environments and microsites. Future host trees would be important if the species survives the period of time new trees could grow to act as hosts.

### 3. Fungi

#### a. Surveys of various sites not completed

Even though they are not required, it would have been helpful to have predisturbance fungi surveys completed as it will be too late to comment on them after this comment period is over. Appendix G pg 211 says that fungi surveys were not conducted in stands less than 180 years old-800 acres have not had surveys conducted. Is there a plan to do these surveys and buffer fungi that are found on this land?

b. The EA states that these species will be directly affected by timber harvest and project activity. However, because Matrix lands are open to timber harvest, that that takes priority. There is nothing that will prevent these species from trending toward listing if the project continues as planned.

#### 4. Noxious Weeds

- a. These are acknowledged problem that could come in when other plants have been removed and the ecosystem is changed. Since they are hearty they will survive where others species will not. The use of native species, seeds and straw/hay was discussed. The emphasis would be on use of native species. Seeding with native grasses after the weeds have been removed could be attempted.
- b. Alternative 4 has fewer roads and road usage therefore the danger of introducing these species would be lower.
- c. Fire is often a good way to reduce infestations even though they eventually grow back
- d. Roadside Firewood Cutting could present a problem for Noxious Weeds because the seeds are brought in from elsewhere. The only thing to suggest is monitoring and treatment when they appear.

#### G. WILDERNESS CHARACTERISTICS-BERRY CREEK UNIT

Retaining this land for Wilderness Characteristics is an excellent idea. Please consider dropping the project within this area and let it be what it is. There is already a footprint and adding to it may not let it retain this status.

#### H. ECONOMICS

There could be unrealistic expectations about projected profits returned to the US Treasury from timber harvests in Southern Oregon. As stated on pg 5, Southern Oregon has low site productivity. We do not produce new forests as fast as those in the north or on the coast. This watershed is no exception. The assumption that younger stands would mature in a predictable way may or may not be true due to marginal soils and changing weather which has always been variable in Southern Oregon and could be becoming more extreme.

It would be interesting to examine if private companies functioning on a 60 year rotation schedule are able to meet their targets without having to rely on public lands.

Ecosystem services such as clean air, fresh water and abundant fishery and recreation opportunities are values that are often left out and taken for granted when calculating the worth of forested watersheds. At a time when resources are generally disappearing, all values should be considered as part of the monetary component.

#### V ALTERNATIVES

The required Broad Range of Alternatives would only be met if Riparian thinning was eliminated in NRF/NSO habitat. This could have been offered as Alternative 5

##### A. Activities Common to all Alternatives

1. Small diameter thinning
2. Precommercial thinning
3. Riparian thinning- I am disappointed that this is to be done in all alternatives. Consider increasing stream buffers to 150' in the Riparian Zone. NRF/NSO habitat must be protected.

4. Hazardous fuel reduction
5. Special projects
6. Ground Based Yarding
7. The same number of acres

B. Alternative 2

While this is the alternative that will make the most money it will also do the most environmental damage because of Regeneration/Shelterwood Harvest, new Temporary Roads, more ground based yarding.

C. Alternative 3

This is the Franklin/Johnson alternative that emphasizes Restoration Thinning and Precommercial Thinning as opposed to Commercial Thinning and Density Management. The Restoration Thinning projects would create a more natural landscape with patches of unthinned area. However, the canopy closures are still limited to 40% and 60%. 40% is too low, especially near NSO sites. Consider tree retention of age class 120 years or older and establish an upper diameter limit of 25FT. It might be interesting to try this alternative in this watershed if larger trees are saved and canopy closures are increased.

D. Alternative 4

This seems like the best alternative but it is also the most expensive. Regeneration Harvest is eliminated and Restoration Thinning is established. It would also eliminate the need for Temporary Roads because of helicopter use and have less ground based yarding. It would be acceptable if Riparian Thinning in NSO habitat were eliminated. Could this alternative make enough money to make it pay for itself and contribute funds for the county?

This concludes my comments. Thank you for your consideration.

Sincerely,

[REDACTED]  
[REDACTED]  
[REDACTED]

Rogue River OR 97537-9771