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Little Butte Creek Watershed Council

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Bureau of Land Management
Western Oregon Plan Revision
PO Box 2965
Portland, OR 97208

Thank you for allowing comment on the BLM proposed Western Oregon Plan Revision (WOPR). This letter states the Little Butte Creek Watershed Council's position and makes recommendations on off-highway-vehicle and logging activities proposed for BLM lands that are located in the Little Butte Creek Watershed (LBCW).

The Little Butte Creek Watershed Council (LBCWC) is a broad based organization supported by the State of Oregon to locally assist in all measures that will "improve and maintain the general health, beauty, productivity and quality of life of Little Butte Creek Watershed…"

The Little Butte Creek Watershed Assessment (Mason 2003) observes that Little Butte Creek Watershed is a 373 square mile 5th field watershed with 13 distinct subwatersheds. There are five major native anadromous salmonids populations in the LBCW: fall and spring Chinook, winter and summer steelhead, and coho. Currently, coho are listed as threatened under the Endangered Species Act. The subwatersheds used by coho (for spawning and/or rearing) are Antelope Creek, Lick Creek, Lake Creek, Salt Creek (Haight personal communication[1]), North and South Fork Little Butte, as well as Mainstem Little Butte Creek. Summer steelhead use these same areas, as well as Rock Creek, Soda Creek, and Lost Creek. Little Butte Creek (LBC) also supports water quality that impacts the Greater Bear Creek Valley in Jackson County.

The LBCW contains a number of streams which are already 303(d)listed as sediment impaired, including Mainstem Little Butte Creek, South Fork Little Butte Creek, Lake Creek, Lost Creek, and Soda Creek. Temperature impaired streams on the 303(d) list include the above, in addition to Burnt Canyon, Antelope Creek, Conde Creek, North Fork Little Butte Creek, and Dead Indian Creek.

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[1] Haight, David. 2007. [Personal Communication] Based on stream surveys done on the first reach of Salt Creek above the mouth. Oregon Department of Fish and Wildlife.

Fine volcanic soils are prevalent in the Little Butte Creek Watershed. These soils are derived from volcanic tuffs, tuff breccias, mudflows, and basalts, all of which are highly altered. Thin clay silty soils develop from these rock types and are highly erosive. The subwatersheds noted for having over 40 percent highly erosive soils are: Antelope Creek, Lick Creek, Lake Creek, Lost Creek and South Fork Little Butte Creek. The most serious risk of erosion in silty soils is on steep slopes or on bare soil with no vegetative cover. On this type of soil with little or no vegetation, a small rill can become a large gully during a single large rainfall event. These gullies can deliver very large amounts of sediment to the local streams (p.102).

Also noted in the August 2003 Assessment, the overall health of the LBCW is moderately degraded. Riparian health and hydrology are rated as the least degraded, and fish habitat is the most degraded of the watershed health parameters. This is most important in those subwatersheds where native anadromous salmonids populations thrive (listed above). Wild spring Chinook and coho numbers have decreased over the last century for a variety of human induced and natural factors. Habitat degradation has limited the recovery potential for the wild anadromous fish stocks of the LBCW.

Preserving and improving the integrity of the watershed and reducing consequential adverse impacts to Little Butte Creek are paramount. It appears to us that some of the policy changes reflected in your plan amendments are not beneficial to State and Local goals to improve and protect Little Butte Creek and its watershed. Below we address the proposed Off Highway Vehicle (OHV) areas and also the proposed logging as they relate to LBCW.

Recommendations for the OHV Emphasis Areas Proposal

We do support an OHV developed area because we feel ultimately it will protect resources by only allowing OHVs in developed areas, and if developed, it should receive the funding needed for the BLM to hire people to oversee the facility and enforce the laws. However, the areas chosen to be brought forward into transportation management to be developed should be selected to avoid adverse effects to resources such as soils, water quality, fish and fish habitat in LBCW.

Three of the proposed OHV emphasis areas are located in the Little Butte Creek Watershed: Obenchain/Worthington, Lake Creek, and Salt Creek. We are asking that these areas be removed from consideration for OHV development for the following reasons:

Sediment Delivery to Streams

Introduction

In the LBCW the three main sources of sediment to streams are road runoff, road instability, and mass wasting. The low infiltration rate of the soils in the watershed exacerbates these problems, which are greatest on steep slopes where human activities are occurring (p.123).

Road Densities

According to the LBCW Assessment, road densities greater than 3.5 mi/mi² are considered to have high potential for delivering large amounts of sediment streams. Road densities in the Salt Creek subwatershed currently exceed that figure (4.1 mi/mi² in 2002). The Lake Creek subwatershed as of 2002 had road densities of 3.4 mi/mi² in 2002). We do not want OHV emphasis areas proposed in the WOPR, and located in LBCW, to increase road density that may adversely impact the streams that are used by salmon or steelhead (listed above) by adding more sediment, which will further degrade fish habitat, migration and spawning in LBCW.

Soils

A large percentage of the soils in the LBCW are thin, clay, and silty and prone to severe erosion. Introducing concentrated motor vehicle recreation use in Salt Creek, Lake Creek and Lick Creek would cause the kind of erosive activity on these soil types that would increase sediment loading in local streams. We do not wish to see this recreational activity or the development of the facility for this activity (which would disturb soils and may cause erosion), adversely impact the streams that feed LBC by adding more sediment, which will further degrade fish habitat, migration and spawning in LBCW.

Stream crossings have the potential for causing sediment to reach local streams (p. 107). Salt Creek subwatershed has the highest density of stream crossings in the watershed at 4.5 mi/mi², closely followed by Lake Creek at 4.1 mi/mi². There is less potential for sediment to be filtered out when roads are close to streams. In Salt Creek 62.7 percent of total road miles are within 60 meters of a stream. Lake Creek is 66.5 percent and in Lick Creek subwatershed it is 64.1 percent. We do not want additional roads and road crossings to adversely impact the streams that are used by salmon or steelhead (listed above) by adding more sediment.

Water Quality

As noted above, The LBCW contains a number of streams which are already 303(d) listed as sediment impaired, as well as temperature impaired. Nine of the thirteen subwatersheds have more than 37 percent of their streams on the list. Rural development and poor land management practices have degraded much of the streams in the LBCW (p. 123). The LBCWC does not want further development of the areas proposed for OHV in the LBCW so as to reduce further risk of water quality impairment.

Recommendations for Proposed Logging Activities

We recognize and support the value of developing sustained yield, and the economic value of logging; however, as stewards of the LBCW we do **not** support any of the action alternatives for logging as they are stated. We feel the following information should be considered when deciding logging operations design for an alternative.

Introduction

Forestland makes up over 65 percent of the Little Butte Creek Watershed. In addition, 25 percent of the Watershed's available year-round habitat for anadromous fish is on federal land.

Management changes on BLM lands in the LBCW to logging practices or harvest rates affect run-off and sediment flow within the watershed; these changes in the watershed will be reflected in the condition of the creeks discussed in this letter.

The two main mechanisms through which forestry practices impact hydrologic processes are (1) removal and disturbance of vegetation and (2) the road system and related harvesting systems (p. 18). The regeneration harvest treatment proposed under Alternatives 1 and 2 would create the maximum disturbance of vegetation possible, and increase the risk of erosion damage to streams because all of the trees would be removed.

Rain on Snow Events

The greatest likelihood of problems arising from forestry practices is through increases in peak flows associated with rain-on-snow events. Rain on snow events occur at intermediate elevations where the snowpack does not accumulate to a great degree. For the Little Butte Creek Watershed, this zone lies between 2500 feet and 4000 feet. Removal of vegetation reduces the crown closure, thus increasing the risk of adverse effects from rain-on-snow events. Regeneration harvest with no green tree retention, as proposed under Alternatives 1 and 2, would increase the chance that a severe rain-on-snow event would release silt-laden peak flows, damaging stream channels and gravel beds throughout the watershed (Mason 2003 p. 18).

Stream buffers

Alternatives 1 and 2 propose to increase the area managed for intensive timber harvest by reducing the size of riparian corridors. The reduction of stream buffers means that much of that increase will be in areas previously recognized as riparian zones. Most of the proposed future logging would be focused on riparian zones because much of the adjoining uplands have already been logged. A given volume of timber will therefore entail relatively greater potential for erosion damage to streams under these Action Alternatives.

The existing stream buffers are not sufficient to maintain water quality at or above the State of Oregon's minimum for sediment and temperature. Reducing stream buffer zones, as proposed in the Action Alternatives of the WOPR would degrade these streams still further, putting them farther out of compliance with state minimums. Stream buffers should remain at the present size on all streams still 303(d) listed.

The BLM should not schedule regeneration harvest in the subwatersheds of LBCW that have steep slopes and fragile soils, including Lost Creek, Lake Creek, Salt Creek, Soda Creek, and South and North Fork Little Butte Creek. Selective harvest should be used in these areas to lower the risk of severe erosion which could jeopardize salmonid populations in Little Butte Creek. Avoid even-aged management; maintain diversity of tree size class within these areas to protect streams and the wildlife that depend on these areas for cover.

Roads as they pertain to Logging

Roads can transport large amounts of sediments thru the associated drainage ditch system. Sediment that is captured in the ditch system from ravel, sliding, and erosion of the road itself, is transported to the stream channel. The suface of the road itself can also provide sediment, depending on the surface material and condition of the road, weather conditions, and traffic. Natural surface roads have the greatest potential for generating sediment, especially if they are heavily used (p.101).

The location of the road in the watershed is also a factor in how much sediment is delivered to the stream system. Roads on ridge crests generally produce less sediment than a road that runs adjacent to a stream. Additionally, roads on steeper slopes are more prone to transport sediment than roads in more level areas.

Road densities in the Little Butte Creek Watershed are already high. In general, road densities greater than 3.5 mi/mi^2 of area are considered to have a high potential for delivering large amounts of sediment to the stream system. As of 2002, nine subwatersheds within the Little Butte Creek watershed had road densities exceeding 3.0. In light of the large increase in off-highway vehicle use within the last five years, present densities are likely much higher.

BLM's proposals to increase timber harvest within the watershed will require construction of still more roads, with subsequent potential for degradation of water quality and wildlife habitat. We would like to see roads being decommissioned and closed to motor vehicles, not the construction of new roads and skid trails.

The Butte Falls Resource Area of the Medford District BLM has recently completed a survey of roads in portions of the Lick Creek, Salt Creek, and Lake Creek subwatersheds. This updated information should be incorporated in planning documents guiding decisions with regard to new road construction or possible decommissioning.

Fire Hazard

The DEIS states on page 770: "The stand establishment and young forests created under the No Action Alternative, Alternative 1, and Alternative 2 would consist of even-aged plantations, which would be highly susceptible to stand-replacing crown fires. This would maintain or increase the crown fire hazard in the South. "

The proposed conversion of mature and structurally complex forest to young, even-aged tree plantations increases the risk of catastrophic crown fires. The incineration of vegetation during a crown fire leads to increased erosion and loss of soils into adjacent waterways. The regeneration harvests proposed under Alternatives 1 and 2 will substantially increase the risk of destructive high severity fire, and consequent delivery of sediments into streams.

BLM should use partial harvests or thinning in areas adjoining important stream habitat for anadromous fish, such as Little Butte Creek.

In addition, BLM should consider the impact of the proposed management activities on increasing the risk to fire fighters and rural residents in the Wildland Urban Interface.

Riparian Species

The Action Alternatives propose to reduce Riparian Management areas by 1/2 (Alt. 1) to 2/3 (Alt. 2 + 3) compared to present management. The DEIS states on page 720, "At a local scale, riparian management areas under Alternatives 2 and 3 adjacent to these intermittent streams would not maintain a stable assemblage of stream and riparian associates species."

Watershed health requires proper maintenance of riparian species. Sustained yield of timber, as contemplated under the O & C Act, would logically entail continued watershed health. BLM should maintain stream buffers large enough to ensure the robust health of riparian areas.

The DEIS states on page 761, "Under all four alternatives, best management practices would be applied and are assumed to maintain or improve water quality." This assumption is not documented or scientifically supportable. BLM should ensure that the management plan adopted will in fact maintain or improve water quality.

Given the present degraded condition of our salmon streams in the LBCW, and their importance to our quality of life as well as their economic potential, we urge that the existing riparian corridor protection be maintained on 303(d) listed streams, and that regeneration harvest not be used on BLM lands within the Little Butte Creek Watershed.

Sincerely,

Thomas W. Dover
President, Little Butte Creek Watershed Council

cc: Jackson County Commissioners