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Bureau of Land Management  
Western Oregon Plan Revisions  
P.O. Box 2965  
Portland, OR 97208

These are comments from the Steamboaters on the Draft Environmental Impact Statement (DEIS) for the Revision of Resource Management Plans for Western Oregon BLM Districts.

Steamboaters is a 35 year old, 300 member flyfishing and conservation organization centered on the North Umpqua River.

1. The DEIS does not contain a range of reasonable alternatives for meeting BLM's management responsibilities in western Oregon. Federal agencies must investigate a range of reasonable alternatives, particularly when the proposed action has such potentially serious environmental consequences.
  - No alternative proposes to increase timber harvest by focusing on thinning of second growth plantations. Such an alternative would also serve to reduce fire hazard on BLM lands.
  - No alternative proposes to increase timber harvest while protecting watersheds and water quality by maintaining riparian protection areas or by selective harvest techniques in these areas which results in no siltation or temperature increase.
  - No alternative explores a sustained yield model which includes a range of timber harvest rotation periods, resulting in each watershed or sub-watershed containing tracts of different forest stages including late-successional reserves.

2. The analysis of Environmental Consequences for Fish (Pg 725 et seq) is inadequate and flawed.
- The analysis assumes a clean slate, and almost completely ignores the deteriorated condition of most western Oregon streams. While harvesting practices may have changed, the impacts from past operations remain with us and cannot be ignored. Current conditions include wide, shallow streams, increased temperatures, low levels of dissolved oxygen, and increased competition from fish species that adapt better to warm water conditions. Timber harvest in the riparian reserves can exacerbate all of these factors to the detriment of salmonids. The DEIS analysis focuses almost completely on the availability of large wood.
  - Riparian protection will be eliminated from intermittent non-fish bearing streams. There is no analysis of negative impacts from debris flows from these areas as riparian protection is removed. These impacts include siltation and stream scouring. In fact debris flows are treated as a positive event, delivering additional large wood to fish-bearing streams.
  - Fish Productivity (Table 210) is estimated to have minimal increases in 100 years compared to existing conditions. There is no estimate of short-range or mid-range impacts in the proposed alternatives.
  - There is no analysis of overall watershed condition, productivity, or impacts from harvest operations on private land.
  - The Peak Flow analysis is inadequate to gauge impacts on fish production or habitat. Problematic peak flows are defined as 5-year, 24-hour flows occurring at 2-year intervals. Damage from peak flow increases can also occur from continuous higher-than normal flows over the rainy season.
  - There is no analysis of decline in summertime flows and resultant increases in temperatures that result from faster runoff of winter precipitation.
  - The brief analysis of stream temperatures claims “None of the alternatives would contribute to an increase in stream temperatures...” This is incorrect and a poor discussion of a critical element for fish survival. There is no analysis of existing degraded conditions, no discussion of varying impacts from the orientation of streams, or the slope of the adjoining ground, or the high amount of flat, bedrock streambeds that exist on many North Umpqua River tributaries. Even slight increases in stream temperature and siltation on degraded streams can push the in-stream environment over the edge to a point where they severely impact the ability of anadromous fish to survive.
  - The stream temperature analysis doesn't discuss impacts to streams which are on the 303(d) list for failing to meet Clean Water Act standards, nor is there any discussion of impacts or contributions to TMDL's.
  - The DEIS claims that increases in temperature and fine sediment delivery would fall within the range of normal variation. However the increase would be in addition to the range of normal variation, not a part of naturally occurring conditions.
  - The DEIS assumes no siltation from ground disturbances greater than 200 feet from a stream. This is simply not true and casts doubt on the entire analysis of siltation from BLM activities.

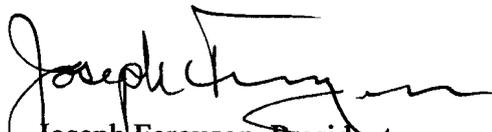
3. The DEIS does not contain discussion of, recognition of, or separate standards for streams which contribute to the Outstandingly Remarkable Values (ORV's) for rivers included in the Wild and Scenic River System. The ORV's identified for the North Umpqua River segment include water quality and the fishery, particularly the anadromous fishery. This plan revision would produce negative impacts to the watershed supporting these ORV's. In particular, Canton Creek, the major tributary of Steamboat Creek (the major steelhead spawning area on the North Umpqua River) and direct tributaries to the North Umpqua River including but not limited to Honey Creek, Clay Creek, Bob Creek, Hill Creek and Susan Creek are all vital to protection of the ORV's in the North Umpqua River system.

4. There is no comparison of existing conditions with reference (undisturbed) conditions in regards to water temperature. The discussion of Past Effects on pages 477/8 essentially dismisses negative impacts from previous actions. In the case of fish habitat and water quality, these previous actions have resulted in marginal conditions; and further deterioration could be lethal to salmonids. The impacts from (projected) small increase in temperature and siltation should be added to existing impacts and measured against undisturbed conditions.

5. The existing inventory of fish-bearing streams is incomplete. Riparian protection standards cannot be assigned until all stream segments have been surveyed.

We request that a new alternative be developed which will accomplish the following:

- Retain the existing Riparian Protection Areas on all streams, both perennial and intermittent.
- Adopt a standard which retains all existing shade on all streams.
- Prohibits management activities which have any negative impacts on tributaries, and consequently the ORV's, of the Recreational segment of the Wild and Scenic Rivers System on the North Umpqua River.
- Protects and enhances water quality, particularly stream temperature, on all fish bearing streams.
- Recognizes Canton Creek, especially upper Canton Creek and tributaries, for their importance in anadromous fish production. This watershed was identified several years ago as a critical watershed by the PACFISH work group. Stream surveys have found up to 37 steelhead redds/mile (Harkleroad, 1991) above Pass Creek. A temperature survey of Canton Creek (Bauer & Oliver, 1969) found increases in temperature from timber harvest in the upper watershed, and temperatures in the mid 70's downstream.

  
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