



February 2, 2021

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**RE: Last Chance Forest Timber Sale Scoping Comments**

Thank you for accepting these scoping comments from the Klamath Siskiyou Wildlands Center (KS Wild) on behalf of Oregon Wild and Cascadia Wildlands. Contact information for our organizations may be found at the conclusion of this document. Please send our organizations hard copies of the forthcoming NEPA analysis and decision documents for the Last Chance timber sale.

**1. Concerns regarding the limitations of the Project's stated Purpose and Need.**

The project states the purpose of the project, but does not state a need – what are the conditions giving rise to the proposed management actions? In line with meeting the requirements of NEPA, we are unsure about the extent to which this project is necessary. Reducing the risk of fire is something we are all on board with, but our concern is that this project may not be prioritizing landscapes where actions are most effective or using the goal of reducing fire risk as a justification to engage in commercial timber harvest. Please specifically demonstrate the criteria for which trees will be logged. Please also describe the harvest methods that will be used for all land allocations and forest types, and the rationale and need for the logging treatments.

Please note that the Purpose and Need for the project does not identify a credible site specific “need” to treat Riparian Reserves that meets the direction of the 2016 BLM RMP and ROD. Hence Riparian Reserve logging is outside of the appropriate scope of this project.

Similarly, the BLM has not provided a site-specific rationale to support LSR logging. The stated “need” to treat overstocked forest stands is misplaced. By far the most overstocked forests in the planning area are the extensive network of timber plantations that the BLM and private timber companies have established in these watersheds. Indeed, proposed regeneration logging and plantation establishment will increase, rather than decrease tree stocking levels in the project area.

- i. *Concern regarding the ability of the BLM to effectively manage lands identified as TPCC.*

Additionally, the forthcoming Last Chance NEPA analysis must disclose the Timber Production Capability Classification (TPCC) of forest stands the project area. Please discuss the agency’s methodology for logging on TPCC lands and how this interacts with the agency’s interpretation of O&C Act and its guidance regarding “annual sustained yield capacity.”<sup>1</sup> Please also indicate if the agency believes that forest stands subject to log landing and logging road construction will be managed to ensure sustainable timber production or if they will be managed into future as areas in which conifers are not present and hence not producing timber volume or providing habitat values.

## **2. Concerns regarding the ability of the project to promote fire resiliency in Late Successional and Riparian Reserves.**

One of the stated purposes of the project is to reduce the risk of catastrophic wildfire and reduce the risk of stand replacing crown fire and to ensure the presence of stable instream wood. Please demonstrate the site specific scientific and management basis for logging late successional and riparian reserves. Additionally, please describe how and whether this proposed logging will impact the wildlife habitat and aquatic objectives of the reserve land use allocations. Please also disclose the presence of spotted owl critical habitat, 303(d) listed streams, Coho critical habitat and Coho essential fish habitat in the project area. We are concerned that pursuing logging practices, such as “group selection” clearcuts in which forests are removed and replaced with timber plantations, will increase fire hazard at the site level.

- i. *Concerns regarding the project’s ability to account for climate change in managing for fire resiliency*

The RMP requires the BLM to address how it will consider uncertainty and flexibility given the effects of climate change. Please describe the methods through which this project will facilitate climate resilience across the landscape and account for uncertainty. If the BLM opts to address the uncertainty through an adaptive management program, please specifically identify management actions, a means through which the actions will be monitored to gauge project success and outcomes, and the means through which the monitoring information will be used to adapt future actions to new information. In this vein, please describe how the BLM will accomplish this monitoring without using the survey and manage features disavowed in the

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<sup>1</sup> U.S. BUREAU OF LAND MANAGEMENT, SOUTHWESTERN OREGON RECORD OF DECISION AND RESOURCE MANAGEMENT PLAN (2016) at 74.

RMP.<sup>2</sup> Does the BLM intend to log forest sites that were previously deferred as survey and manage buffers?

### 3. The need for a high degree of collaboration with the public

In addition to the logging activities proposed by this management project, please indicate how the BLM will increase its capacity to reduce wildfire risk and achieve the project's stated purpose by collaborating with local landowners as described in the RMP.<sup>3</sup> In addition to the direction to collaborate in the RMP, the DOI regulations for implementing NEPA encourage the public to put forth collaborative based alternatives.<sup>4</sup> Please consider and incorporate into the forthcoming NEPA document an alternative proposed by the public. Indeed, per a recent Report and Recommendation put forth by Magistrate Judge Clarke involving the Medford BLM in Oregon District Court, collaboration can "result in more transparency, improved outcomes, and fewer projects stuck intime consuming litigation" because "each party has expertise that should be at the table in discussing and planning these public projects."<sup>5</sup>

If a collaborative based alternative is not ultimately chosen as the proposed or preferred alternative, please incorporate collaborative elements in the proposed or preferred alternative, as this will promote partnership, facilitate a sense of ownership with local communities, and increase overall project capacity.<sup>6</sup>

#### *i. Proposed Collaboration-based Alternative Outline*

Our organizations hereby proppose an action alternative designed to meet the purposed and need for the Last Chance Forest Management Project in which:

- Fuel reduction treatment activities are conducted through stewardship contracts, the selection of which is done through a public participatory process. Opportunities to participate in the selection process should be fully done virtually if possible.
- Selection of small diameter timber to be thinned in overly dense stands will be based on ecologic principles informed though both BLM expert knowledge and experts within the community.
- Remaining mature forests and fire-resilient large diameter trees (over 20" inches DBH) are retained;
- Downgrading and removal of suitable spotted owl habitat, especially within the identified Late Successional Reserves is avoided; and
- Existing roads are upgraded while new road construction is avoided.

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<sup>2</sup> *Id.* at 27.

<sup>3</sup> *Id.* at 26.

<sup>4</sup> Department of Interior: Incorporating consensus-based management, 46 C.F.R. § 110 (b).

<sup>5</sup> Magistrate Report and Recommendation, *Klamath Siskiyou Wildlands Center et al., v. Bureau of Land Management et al.*, CN 1:17-cv-00997-CL, (D. Ore. 2019).

<sup>6</sup> See generally COUNCIL ON ENVIRONMENTAL QUALITY, COLLABORATION IN NEPA: A HANDBOOK FOR NEPA PRACTITIONERS, Oct. 2007.

The recommendations above are reasonable and have been successfully implemented by BLM Districts throughout Oregon. The Medford BLM is capable of planning and successfully implementing timber sale projects that seek to produce wood fiber while retaining canopy cover and wildlife habitat, avoiding harvest of large-diameter preferred tree species, and reducing (rather than increasing) cumulative impacts to soil and watershed resources. Please consider implementing the reasonable sideboards utilized in previous successful “dry forest restoration” BLM pilot projects in Southern Oregon and within the Ashland Resource Area that were based on the recommendations of forestry professors Johnson and Franklin.

#### **4. Concerns regarding the proposed treatment on Late Successional Reserves and the potential direct and cumulative impacts to at-risk species.**

One of the primary purposes of the SW RMP is to reserve sufficient acres of LSR to create “large blocks of nesting, roosting, and foraging habitat that are capable of supporting clusters of reproducing northern spotted owl.”<sup>7</sup> The cumulative effects of BLM and private logging and road construction in the landscape around the proposed project demonstrate that there is already a scarcity of sufficient late-successional forest habitat to meet this stated purpose. Given that the Last Chance project proposes more than 1600 acres of thinning and treatment on LSR allocations, we are concerned about the impact any project will have on these landscapes and the wildlife living therein through the downgrading of existing NRF habitat.

##### *i. Concerns regarding the project’s potential impact to Northern Spotted Owl habitat.*

The RMP states that the BLM’s intends to “provide for the net conservation and recovery of the spotted owl...by contributing to barred owl management” and “minimize[e] adverse impacts associated with timber harvest and other activities.”<sup>8</sup> Please demonstrate how logging, yarding, and hauling activities in the LSR land allocation provides for the conservation and recovery of the spotted owl in the short and long term. Additionally, please demonstrate how the project will contribute to barred owl management and interspecies competition with NSO. We are also concerned about the extent to which the direct and cumulative impacts of the timber sale impacts opportunities for NSO recovery and Barred owl encroachment.

Additionally, please specify how the BLM plans to facilitate Northern Spotted Owl recovery implementation oversight through undertaking Recovery Actions set forth in the Revised Recovery Plan for the NSO. Specifically, please specify how the BLM proposes to “conserve spotted owl sites and high value spotted owl habitat to provide additional demographic support to the spotted owl population” pursuant to Recovery Action 10.<sup>9</sup>

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<sup>7</sup> SW RMP at 22.

<sup>8</sup> Id. at 24.

<sup>9</sup> U.S. FISH AND WILDLIFE SERVICE, REVISED RECOVERY PLAN FOR THE NORTHERN SPOTTED OWL (2011) at III-43.

In line with Recovery Action 10, please specify how the BLM proposes to use monitoring and survey data to determine habitat conditions across the project landscape. Additionally, please provide information regarding the “probability of persistence of the spotted owl population at the province scale.”<sup>10</sup>

We would also like the BLM to provide information regarding how the stated goals of the project will comply with Recovery Action 32.<sup>11</sup> Please describe how the BLM will work with the Fish and Wildlife Service to meet the complementary goals of “maintaining and restoring [spotted owl] habitat” while addressing the project’s stated purpose of minimizing fire risk through management actions.<sup>12</sup> We are aware that the Grants Pass resource area is proposing “regeneration harvesting” and “group selection” logging in many of its projects which will *increase* site-specific and cumulative fire hazard for decades.

*i. Concerns regarding the impact on neotropical migratory birds*

The regional decline of migratory birds is a significant issue for this project. Numerous studies have reported local and regional trends in breeding and migratory bird populations throughout North America. The forthcoming NEPA document for this project should analyze and disclose the potential impacts of conifer thinning operations and brush removal on neotropical bird population trends.

The cumulative effects analysis on migratory birds should not rely exclusively on the Resource Management Plan, Riparian Reserves and LSRs to provide for species viability into the future because it is the collective and cumulative impact of individual habitat removing actions that is pushing these species towards extinction. Further, the Medford BLM is currently engaged in an “Integrated Vegetation Management” (IVM) NEPA process specifically designed to facilitate widespread removal of existing bird habitat from the Late Successional and Riparian Reserve networks.

Simply concluding that the scale of the project is small, relative to the size of the nation, hence migratory bird populations will not be affected, will not suffice. As per DOI BLM instruction memo 2008-50 the BLM must “include migratory bird species of concern in the affected environment[al analysis] when any of these species may be affected by the proposed actions....”<sup>13</sup> Further, the agency must “emphasize avoidance or minimizing negative impacts and restoring and enhancing habitat quality....”

Please develop and implement seasonal operational restrictions to avoid project impacts while land birds are nesting in the project area. An example of such restrictions may be found in the Highway 89 Safety Enhancement and Forest Ecosystem Restoration Project on the Shasta-Trinity National Forest in which project activities that could impact cavity-nesting and ground-and-shrub-nesting migratory bird species are prohibited during the primary nesting period of April 15 to July 31.

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<sup>10</sup> *Id.*

<sup>11</sup> *Id.* at III-67.

<sup>12</sup> *Id.*

<sup>13</sup> US DOI, Migratory Bird Treaty Act Interim Management Guidance (IM 2008-050).

Pursuant to the Migratory Bird Treaty Act (MBTA), it is unlawful “at any time, by any means or in any manner to . . . take [or] kill . . . any migratory birds, [and] any part, nest, or eggs of any such bird.”<sup>14</sup> This prohibition applies to federal agencies and their employees and contractors who may not intend to kill migratory birds but nonetheless take actions that result in the death of protected birds or their nests.<sup>15</sup>

The prohibition on “take” of migratory birds includes destruction of nests during breeding season. Specifically, “nest destruction that results in the unpermitted take of migratory birds or their eggs, is illegal and fully prosecutable under the MBTA.”<sup>16</sup>

Under the MBTA, “any person, association, partnership, or corporation” who violates the MBTA or regulations thereunder are subject to criminal and civil penalties.<sup>17</sup> Violations of the MBTA are prosecuted as a misdemeanor, and upon conviction thereof, are subject to fines of up to \$15,000 or imprisonment of up to six months, or both.<sup>18</sup>

The forthcoming NEPA document should evaluate the effects of the proposed project on migratory birds protected under the MBTA. The MBTA prohibits the destruction of nests and eggs of migratory birds. The BLM should evaluate the impacts of project activities on migratory bird nests, should disclose the breeding season for each migratory bird species found in the project area, and should proposed measures (such as seasonal restrictions) to avoid destruction of nests.

Please note that the 2016 RMP ROD specifically directs the BLM to “conserve or create habitat for species addressed by the Migratory Bird Treaty Act...”<sup>19</sup>

ii. *Concerns regarding the project’s impact on Bureau Sensitive Species and Special Status Plants*

The Last Chance scoping notice makes no mention of BSS species in the project area. We believe there is considerable risk that the BLM will not follow the 2016 RMP ROD direction to “implement conservation measures that reduce or eliminate threats to Bureau Sensitive Species...”<sup>20</sup>

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<sup>14</sup> 16 U.S.C. § 703(a).

<sup>15</sup> *Humane Soc’y of the United States v. Glickman*, 217 F. 3d 882 (D.C. Cir. 2000) (holding that federal agencies are required to obtain a take permit from FWS prior to implementing any project that will result in take of migratory birds); see also *Robertson v. Seattle Audubon Soc’y*, 503 U.S. 429, 437–38 (1992) (finding that federal agencies have obligations under the MBTA) and *Center for Biological Diversity v. Pirie* (191 F.Supp.2d 161 (D.D.C. 2002) (allowing injunctive relief against federal agencies for violations of the MBTA).

<sup>16</sup> U.S. Fish and Wildlife Service, Migratory Bird Permit Memorandum, from Director Steve Williams dated April 15, 2003.

<sup>17</sup> 16 U.S.C. §707.

<sup>18</sup> *Id.*

<sup>19</sup> SW RMP at 115.

<sup>20</sup> *Id.*

The direction to “include altering the type timing, location, and intensity of management actions” for the benefit of BSS species appears incompatible with the BLM’s intent to focus on timber production targets regardless of impacts to wildlife habitat in this planning area.<sup>21</sup> Please implement the direction to “[u]tilize integrated vegetation management in designing and implementing treatments... for any of the following reasons... Restore and maintain habitat for Bureau Special Status species.”<sup>22</sup> Please implement the direction to “[p]rovide for the conservation of Bureau Special Status plant and fungi species.”<sup>23</sup>

The Last Chance scoping notice contains no information or management goals regarding Pacific fisher (or any other BSS species). We are concerned that proposed regeneration and large tree logging may contribute to the need to list the species under the ESA.

Additionally, please be explicit in the forthcoming NEPA documentation about the management of BLM special status plant species in this project. In that vein, please disclose whether there are any formerly buffered survey and manage plant or animal habitat sites within the project area.

*iii. Concerns regarding the cumulative impacts across the landscape*

Please specify the extent to which this project’s impacts will contribute to the overall forest and watershed cumulative impacts. In addition to the cumulative impacts on NSO, please also describe the project’s contribution to the cumulative landscape impacts on overall ecosystem health and function. We are especially concerned given the history of logging occurring across the region, specifically recent and planned projects including the Poor Windy Forest Regeneration Logging Project.<sup>24</sup>

*iv. Concerns regarding the secondary indirect project impacts caused by ORV use and road construction*

The cumulative (and direct) impacts on sediment and erosion rates from timber haul are particularly important for the Last Chance planning effort given that riparian road densities are high, elevated sediment and turbidity levels are occurring because of an extensive road network and other disturbances and hauling and road maintenance activities are expected to result in short-term increases in sediment and turbidity. This may negatively impact already § 303(d) listed streams in the planning area in violation of the Clean Water Act. The BLM must quantify the cumulative impacts of sediment production from haul and explain why it intends to increase sediment loading in this highly impacted watershed.

Additionally, the cumulative terrestrial and hydrological impacts from the significant logging throughout the “checkerboard” land use pattern in the planning area must be disclosed and analyzed in a forthcoming EIS. The level of logging and road construction on both BLM

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<sup>21</sup> SW RMP at 115.

<sup>22</sup> *Id.* at 72.

<sup>23</sup> *Id.* at 106.

<sup>24</sup> Poor Windy Forest Management Project Environmental Assessment, DOI-BLM-ORWA-M070-2018-0010-EA (2019)

and private industrial timberlands in the area is extreme by any measure and has significantly altered by the species and seral composition across thousands of acres. The impacts of this practice on wildlife connectivity must be fully disclosed and analyzed prior to rendering the decision to build more logging roads and remove more forest canopy.

The BLM has repeatedly acknowledged the need to reduce (rather than increase) road densities in the planning area. The cumulative impacts of landings, Off Road Vehicle (ORV) routes, and skid trails, when combined with the significant existing impacts of the extreme road density must be quantified and disclosed in the forthcoming NEPA document.

In prior timber sale NEPA documents, the BLM has previously recognized that: (1) road construction contributes to peak flows; (2) the agency has failed to adequately maintain its existing network of logging roads; (3) road construction will increase soil erosion and compaction; (4) avoiding road construction would better protect soil resources; (5) the existing road density on BLM lands is high; and (6) the agency has been ineffective in preventing ORVs from exacerbating the impacts of the BLM road system. Yet the agency often insists on proposing new additional road construction while refusing to consider or develop reasonable action alternatives that would reduce road density. Such an approach is arbitrary and capricious.

The BLM is aware that ORV use is occurring in the project area and that ORV use is adversely impacting terrestrial and aquatic forest values. But the BLM is unable to ascertain the extent to which its proposed actions will facilitate and enable such ORV impacts. Either the BLM must quantify the effects of its actions, or it must complete an EIS. The agency cannot conclude that logging activities may contribute to an already significant cumulative effects that cannot be quantified and then just shrug off the consequences of additional logging and road construction.

Similarly, the BLM must disclose the location, number, and cumulative impacts of new log landings in conjunction with the significant impacts occurring from the excessive transportation system. How many acres will be utilized as landings, where will these landings be located, and what are their synergistic impacts with the network of logging roads?

*v. Concerns regarding edge effect and blowdown.*

Edge effect and blowdown associated with, and exacerbated by, logging activities on public and private lands are a significant issue for this project area. BLM planners must acknowledge, analyze, and account for the impacts of significant canopy removal through logging on edge effect and blowdown.



**5. Concerns regarding the project's ability to meet the requirements of water quality management plans and generally apply the principles of Ecological Forestry.**

- i. Please describe how the project will ensure that water temperatures and sediment storage within the project's watersheds will not exceed the standards set under CWA § 303(d)(1).*

Please demonstrate how the project will not contribute to a 7-day rolling temperature increase over 64 degrees in the Middle Cow Creek, Upper Cow Creek, and the Grave Creek watersheds, including but not limited to methods such as road maintenance, maintaining water flow, and decommissioning roads within the watershed.<sup>25</sup> Please also quantify the "periodic monitoring actions" required under the plan.<sup>26</sup> In addition to describing impacts to water temperature directly related to this project, please also describe the cumulative impacts that this project and others have and will have on water temperature within each watershed. Grave Creek watershed is of particular import because of its history of exceeding water quality standards set by § 303(d)(1).<sup>27</sup>

Please describe how the project will use Ecological Forestry principles to guide the management actions. Specifically please describe how the project will protect older trees within the project area, how the proposed thinning will "speed the development of northern spotted owl habitat," how each treatment within the stated land allocation will be screened to ensure "uneven-aged stand management [to facilitate] fire resilience in the dry forest," and whether and which key forest structural components will be retained following natural disturbance within the reserves.<sup>28</sup> We are concerned that the project's stated purpose will be used to quantify adherence to the principles of Ecological Forestry without providing specific analysis and a rationale for doing so.

- i. Concerns related to whether the project will adequately be informed by the watershed analysis for each associated watershed.*

While the BLM has rejected the NW Forest Plan and its Aquatic Conservation Strategy, information generated by BLM staff contained in the Watershed Analysis (WA) is nevertheless relevant to project planning, must be addressed in the Last Chance project NEPA document and decision, and should have been utilized to help inform the development of action alternatives.

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<sup>25</sup> Middle Cow Creek WRM at 30.

<sup>26</sup> *Id.* at 38.

<sup>27</sup> Grave Creek WQRP at 15.

<sup>28</sup> SW RMP at 23.

Hence, the Last Chance project should incorporate and reflect the following BLM findings and recommendations contained in the WAs:

a. Upper Middle Cow Creek Watershed Assessment:

Page 64 of the Middle Cow Creek Watershed Assessment states:

*Recent consultation with NMFS has indicated that when a new road is constructed, another road should be decommissioned to offset the environmental effects. However, intermingled public and private land ownership patterns and existing reciprocal right-of-way agreements often prevent BLM from closing or decommissioning roads in this watershed.*

Hence the BLM should avoid new road construction in this heavily roaded watershed. Please note that the impacts to soils, hydrology and vegetation from “temporary” road construction can be significant and long-term.

Page 64 of the Middle Cow Creek Watershed Assessment also indicates that:

*Lack of maintenance from federal funding sources, new construction on private land and a lack of maintenance on private plan all point to a decline in stability and overall increase in sediment production. The trend is seen a decline in stability and maintenance for the long term.*

This increase in sediment and decline in watershed stability is significant and may be exacerbated by new road and landing construction and by ground-based yarding activities.

Page 85 of the Upper Cow Creek Watershed Assessment indicates that:

*Road maintenance funding, often attached to timber sale levels, has been declining in recent years. Maintenance of roads, especially non-system roads, has been substantially reduced as a result. Several of the roads in this watershed have not been maintained and as a result are in various stages of deterioration, most often being overgrown by brush, hardwoods, or conifers and in some cases having slid out as a result of landslides. Plugged culvers and ditch lines have resulted in several washed-out roads and numerous failures.*

Hence there is an urgent need to reduce, rather than increase, the impacts of the BLM transportation system on this watershed. Please consider road closures and decommissioning that will allow the BLM to better maintain the remaining roads to standard. Please do not exacerbate existing significant impacts through new road construction in combination with soil impacts from yarding, landings, and haul activities.

Please note that page 99 of the Upper Cow Creek Watershed Assessment acknowledges:

*Road density exceeds 3.5 miles/mile in all three 6<sup>th</sup> field HUCs. High road densities increase the potential for reduced water quality and fish habitat degradation. Continued improvement of the road system, including closure of unnecessary or problematic road segments, replacement of undersized culverts/fish barriers, and ongoing maintenance, will be necessary to minimize the impacts of roads on sediment delivery to streams.*

Page 101 of the Upper Cow Creek Watershed Assessment indicates that:

*Areas of high road densities should be looked at for possible decommissioning to reduce sedimentation, habitat fragmentation and disturbance to wildlife. [Emphasis in the original document.]*

b. Middle Cow Creek Watershed Analysis:

- Some soil types are considered to be sensitive to management activities such as timber harvest, road construction and broadcast burning, including shallow soils (less than 20 inches deep), soils derived from granite or schist, and soils derived from serpentine or peridotite.<sup>29</sup>
- While the BLM manages 40 percent of the watershed, only 22 percent of the water quality limited streams in the watershed occur on BLM lands<sup>30</sup>.
- Roads are the primary sediment source to streams in this watershed. There are 811 miles of roads in the watershed.<sup>31</sup>
- In this watershed, of the 154 miles of fish streams, 143 miles (93 percent) are within 330 feet of a road; 120 miles (78 percent) are within 165 feet of a road (Table 7). In other words, virtually all the fish streams in the watershed have a road in close proximity, which will provide a continuous source of sediment in most cases.<sup>32</sup>
- Fish habitat quality is in fair to poor condition throughout the watershed, with a stable or declining trend.<sup>33</sup>
- The Middle Cow Creek watershed contains approximately 85 miles of stream habitat for winter steelhead, Coho and fall chinook salmon. Resident cutthroat and rainbow trout inhabit about 154 miles.<sup>34</sup>
- It is believed that degraded conditions on all Cow Creek tributaries are limiting salmonid production, as well as limiting habitat suitability for other native aquatic species.<sup>35</sup>

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<sup>29</sup> Middle Cow Creek Watershed Analysis at 5.

<sup>30</sup> *Id.* at 20.

<sup>31</sup> *Id.* at 21.

<sup>32</sup> *Id.* at 23.

<sup>33</sup> *Id.* at 25.

<sup>34</sup> *Id.* at 26.

<sup>35</sup> *Id.* at 27.

- Three natural factors may limit stream productivity to a minor extent: isolated pockets of serpentine soils, high water temperatures and low summer flow in tributaries.<sup>36</sup>
- Many roads have been constructed in the vicinity of stream courses. Many of these roads contribute sediment to streams and have modified riparian vegetation so that shading and microclimate have been affected.<sup>37</sup>
- An aggressive effort should be made to reduce open road densities in the watershed through decommissioning, barricading, and gating.<sup>38</sup>

c. Graves Creek Watershed Analysis:

- 9 creeks within the Graves Creek watershed are 303(d) listed for temperature.<sup>39</sup>
- Stream channel widths on Grave Creek above Salmon Creek and on all Grave Creek tributaries are narrow enough for stream-side vegetation to provide adequate shade.<sup>40</sup>
- The geology and soils of this basin do not allow for a great degree of water storage. Uplands are steep and soils profiles are relatively shallow. Recharge of streams by ground water is very limited during summer months.<sup>41</sup>
- Sedimentation is also known to be a major problem for streams in this watershed.<sup>42</sup>
- Roads are a chronic sediment source to streams in this watershed. There are 808 miles of roads in the watershed, representing approximately 4,848 acres in roads.<sup>43</sup>
- In this watershed, there are 252 miles of streams which have a road within 166 feet, (23 percent of all streams) the approximate height of one site-potential tree. The situation is more dramatic regarding fish streams. Approximately 91 miles out of the 122 miles of fish streams (75 percent) have a road within the Riparian Reserve (i.e., within 335 feet of a road). These roads have a high potential for providing sediment directly into the streams, as well as disrupting riparian habitat and connectivity along streams.<sup>44</sup>
- An aggressive effort should be made to reduce open road densities in the watershed through decommissioning, barricading, and gating.<sup>45</sup>
- Existing culverts should be improved, where necessary, to provide free passage of aquatic organisms both up and down stream.<sup>46</sup>
- Please consider reintroducing beavers where conflicts with other uses is minimal.<sup>47</sup>

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<sup>36</sup> *Id.* at 29.

<sup>37</sup> *Id.* at 66.

<sup>38</sup> *Id.* at 70.

<sup>39</sup> Graves Creek Watershed Analysis at 8.

<sup>40</sup> *Id.* at 9.

<sup>41</sup> *Id.* at 10.

<sup>42</sup> *Id.* at 10.

<sup>43</sup> *Id.* at 11.

<sup>44</sup> *Id.* at 12.

<sup>45</sup> *Id.* at 94.

<sup>46</sup> *Id.* at 95.

<sup>47</sup> *Id.* at 96.

- Prescribed fire to reduce fire hazard and risk should be used to help preserve the existing timber and non-timber resources, and to help the interaction with rural interface issues.<sup>48</sup>
- The four large late-successional blocks in the northern portion of the watershed (Map 23) should be managed to maintain interior habitat over the next decade or two.<sup>49</sup>
- Where feasible, maintain some level of connectivity between the large blocks of late-successional habitat and the corridor along the north boundary.<sup>50</sup>

## 6. Conclusion

Removing and reducing mature forest canopy is a shortsighted and counterproductive way of attempting to meet BLM timber targets. Please work with interested stakeholders to develop projects that increase, rather than decrease, forest and watershed health. Substantive partnerships that acknowledge all the interests in America's public lands would better serve the BLM than continuing to develop projects that primarily serve a narrow set of timber interests.

Regards,

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<sup>48</sup> *Id.* at 96.

<sup>49</sup> *Id.* at 97.

<sup>50</sup> *Id.* at 97.