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Submitted by email to BLM_OR_RMPs_WesternOregon@blm.gov

RE: Planning Update for Western Oregon's Forests

Dear Mr. Brown:

We thank you for the opportunity to comment on the revision of the Resource Management Plans (RMPs) for Western Oregon.

The Pacific Rivers Council is a non-profit conservation organization dedicated to the development and implementation of science-based public policies that protect and restore aquatic ecosystems and the species that depend on them. PRC is comprised of over 700 members from throughout the western United States who live, use, enjoy, and value the area affected by the RPM revisions. Members of PRC regularly use the forests and streams of western Oregon for fishing, boating, swimming, hiking, camping, backpacking, bird watching, cross-country skiing, downhill skiing, and biological study.

We have provided a summary of recommendations and detailed comments below.

Summary of Recommendations

- The DEIS should consider continued management of the Western Oregon BLM lands under the NWFP and its ACS as informed by the adaptive management process as a discrete alternative.
- The DEIS should consider, as a separate alternative, continued management under the NWFP and ACS with enhancements, as informed by the adaptive management framework of the NWFP, that increase the likelihood that the ACS objectives will be met.

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- Any alternative adopted must continue and enhance a robust coarse-scale aquatic conservation planning framework consistent with the principles of the NWFP ACS.
- The DEIS should include an analysis of the use of parcel swaps and other procedures for land consolidation to achieve the goals of the ACS.
- The DEIS should include a detailed analysis of the impacts of the alternatives on watershed hydrology and patters of discharge. Impacts should be analyzed at the spatial scales where impacts are pronounced and ecologically significant. Analysis should not be limited to the effects of canopy reductions, but also address soil compaction, roads and road use, logging, and grazing. The DEIS should also disclose the uncertainties and limitations of its analysis.
- The DEIS should inventory and evaluate remaining passage barriers, evaluate the availability of materials (e.g. sound large diameter boles and rootwads) for habitat enhancement, and assess the contributions of a highly active stewardship program on economics and community stability.
- Where the DEIS contemplates management changes to address fire, such as increased thinning, pre-commercial mechanical treatments, or prescribed burning, these activities should be evaluated in light of the actual efficacy of the proposed treatments and their potential effects on aquatic habitats which may arise from ground disturbance, soil compaction, LWD recruitment, and erosion and sediment delivery from roads and road use.
- Where the DEIS contemplates continuing or increasing thinning, thinning should be evaluated in light of the potential effects on aquatic habitats which may arise from ground disturbance, soil compaction, LWD recruitment, and erosion and sediment delivery from roads and road use.

The current (1995)[1] RMPs implement the environmentally preferable alternative that arose out of the northwest forest planning process of the late

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[1] On September 7, 2005, the BLM announced the Western Oregon Plan Revisions (WOPR) process. PRC provided extensive comments to BLM during the development of the WOPR and its DEIS (available at http://pacificrivers.org/conservation-priorities/land-management/federal-forest-planning/western-oregon-plan-revisions/prcs-comprehensive-comments-on-the-draft-eis). On December 30, 2008, the BLM adopted the WOPR for the BLM's Salem, Eugene, Roseburg, Medford, and Coos Bay Districts, and the Klamath Falls Resource Area of the Lakeview District. The RODs eliminated the Northwest Forest Plan's Aquatic Conservation Strategy, decreased the width of riparian buffers, and changed the standards, guidelines, and

1980's and early 1990's. This approach emphasized ecosystem management and retention of late-successional forests, restoration and/or maintenance of watershed conditions, protection of special status and other species requiring special attention, and other land uses consistent with the February 1994 *Final Supplemental Environmental Impact Statement on Management of Habitat of Late-Successional and Old-Growth Forest Related Species Within the Range of the Northern Spotted Owl* and its associated April 1994 interagency *Record of Decision for Amendments to Forest Service and Bureau of Land Management Planning Documents Within the Range of the Northern Spotted Owl* ("Northwest Forest Plan" or "NWFP"). The NWFP was "the culmination of an unprecedented effort in public land management" to produce "a balanced, comprehensive and long-term policy for the management of over 24 million acres of public land" that uses an ecosystem management approach to produce "a healthy forest ecosystem with habitat that will support populations of native species and includes protection for riparian areas and waters," along with "a sustainable supply of timber and other forest products that will maintain the stability of local and regional economies, and contribute valuable resources to the national economy, on a predictable and long-term basis." (USDA and USDI, 1994).

The NWFP conserves forested aquatic ecosystems through the Aquatic Conservation Strategy (ACS), which establishes riparian buffers where timber harvest is prohibited, provides extra protection to key watersheds, limits activities both streamside and upland that interfere with aquatic health objectives, emphasizes watershed restoration, and requires scientific analysis for some individual watersheds. The ACS was developed as a "cornerstone" of the NWFP necessary to provide for the recovery of fish populations (NMFS 2007) and intended to protect and restore aquatic habitats (USDA and USDI 1994).

The NWFP established a comprehensive monitoring framework to ensure that the plan measures are implemented, to verify their efficacy, and to drive an adaptive management process. (USDA and USDI, 1994).

> *"Adaptive management is a continuing process of action-based monitoring, researching, evaluating and adjusting with the objective of improving the implementation and achieving the goals of the RMP. This*

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directives for management within riparian buffers. Due to BLM's failure to undertake ESA Section 7 consultation with the United States Fish and Wildlife Service and the National Marine Fisheries Service, pursuant to 16 U.S.C. §1540(g)(2), the adoption of the WOPR action was vacated by court order in *Pacific Rivers Council v. Shepard,* 03:11-CV-442-HU, 2012 WL 950032 (D. Or. Mar. 20, 2012).

> *approach to evaluation and interim adjustment will frame a process of adaptive management, permitting effective response to changing knowledge. The RMP is based on current scientific knowledge. To be successful, it must have the flexibility to adapt and respond to new information. Under the concept of adaptive management, new information will be evaluated and a decision will be made whether to make adjustments or changes. The adaptive management approach will enable resource managers to determine how well management actions meet their objectives and what steps are needed to modify activities to increase success or improve results."* BLM, 1995. Record of Decision for the Medford District Resource Management Plan. Bureau of Land Management, Medford District.

Analyze continued management under the NWFP as an alternative

Aquatic species, including salmon and amphibians, need the habitat provided by BLM lands in Oregon to thrive. Western Oregon BLM lands include more than 20,400 miles of rivers and streams and 218,199 acres of lakes, ponds, and wetlands. NWFP monitoring strongly confirms that the Plan is an effective strategy to continue cutting timber while conserving rivers, fish and wildlife. The 15-year study concluded that watershed and aquatic habitat conditions for salmon and steelhead are generally improving in accordance with projections: "[t]he majority of watersheds had a positive change in condition scores . . . Of those with larger positive changes, most were driven by both improvements in road (decommissioning) and vegetation (natural growth) scores. (Davis et al. 2011). There is no demonstrated need for change in aquatic conservation practices on Western Oregon BLM lands and there has been no credible policy review recommendation to abandon the NWFP or its ACS. Numerous scientific and federal agency documents conclude that the ACS is necessary to protect aquatic species and water quality and to comply with the Endangered Species Act, the Clean Water Act, and the O&C Act. Further, federal recovery plans for endangered species continue to recognize and rely on the continuation of management of federal forest lands under the NWFP. For example, NMFS' draft recovery plan for salmon and steelhead in the Lower Columbia basin finds implementation of the NWFP "crucial in protecting and restoring coho salmon habitats"[2] and "crucial in protecting watershed processes."[3] Any reduction in protective measures will undermine the central assumptions of those federal recovery efforts.

Suffice it to say, the RMP revisions are not occurring in a vacuum. Revisions to the RMPs must be limited to judicious modification of the current plans as

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[2] page 6-31
[3] page 7-68

informed by new credible information and substantial changes in public need. Any other approach would be unfaithful to the enormous public investment in the development in the NWFP and the public's reliance on the NWFP to balance the critical public and private interests that rely on the sound management of the covered federal lands. Therefore, the DEIS must consider continued management of the Western Oregon BLM lands under the NWFP and its ACS as informed by the adaptive management process as a discrete alternative.

Analyze management under the NWFP with enhancements as a separate alternative

Watershed assessment was one of the key components of the NWFP ACS. The Aquatic and Riparian Effectiveness Monitoring Program (AREMP) 15-year Watershed Status and Trend (Lanigan et. al. 2012) identified a number of needed modifications to roads data development and management necessary for watershed assessment. BLM road data is currently incompatible with USFS road data. BLM road data should be converted to a form compatible with USFS data to facilitate analysis of watershed conditions across ownership boundaries. Roads on non-federal lands are likely to influence watershed conditions. The BLM should develop roads data on non-federal lands, such as through remote sensing, within and include in watershed assessment. Non-system roads may influence hydrologic processes and are not accounted for in the current assessment methods. Include all non-system and "ghost" roads in road data and watershed analysis. Roads that are merely administratively closed are likely to affect watershed condition differently than roads that are partially treated and roads that are fully obliterated and recontoured. The BLM and the USFS should refine the categories for "decommissioned" roads such that obliterated, partially treated roads, and roads that have merely been closed by a gate may be distinguished for purposes of watershed assessment.

By precluding or limiting access to potentially large amounts of habitat at a single choke point, fish passage barriers have a strong influence on watershed habitat condition for salmon and steelhead. Watershed assessment should incorporate the presence and evaluation of fish passage barriers, such as those posed by watercourse crossings (Lanigan, 2012).

Artificial water withdrawals are affecting peak discharge and summer flow. (Lanigan 2012). The BLM should develop measures to assess artificial modification of instream flow as part of watershed analysis. Water drafting is diversion of water from a water body through use of a water truck. Water drafting associated with timber harvest activities is generally conducted for application to unpaved forest roads for dust abatement purposes. As such, water drafting is usually done during dry periods in the spring, summer, and

fall, when rearing juvenile salmonids may be particularly vulnerable to reductions in instream flow. As such, an analysis of the effects of water drafting on instream flow should be included in the DEIS.

Currently, watershed and assessment under the NWFP omits elements developed within the USFS National Watershed Assessment framework (Lanigan, 2012). The USFS Watershed Condition Classification (WCC) system proposes a nationally standardized outcome-based performance measure of condition change (USDA 2011). The BLM should harmonize its monitoring and watershed assessment program with useful and applicable components of the WCC, including water quantity indicators such as hydrograph modification and the presence of dams and diversion facilities.

Watershed Restoration is also a key component of the NWFP ACS. Currently these projects are not included in watershed analysis (Lanigan 2012). These projects should be tracked and included in watershed analysis in order to capture the likely substantial improvements these activities are having on watershed condition and drive the adaptive management process for implementing restoration activities.

Since the time of the NWFP, new information has become available regarding the potential impacts of artificial flow modification on salmonids. Such impacts include: blocked or delayed migration, reduction in useable habitat, stranding fish, increased temperatures, alteration of hydrologic cycles, interruption of invertebrate drift, disruption of channel dynamics, increased deposition of sediments, inhibited recruitment of spawning gravels, promotion of encroachment of vegetation (NMFS and CDFG 2002); triggering early emigration of juvenile salmonids, reduced growth and survival of fish, reduced prey production (Snider 1985); increased vulnerability to terrestrial predators, reduced water depths, redd superposition, increased disease due to thermal stress (Vadas 2000); temporal shifting of peak and low flow periods, reduction of channel forming flows, reduction of sediment transport capability, disruption of connectivity (Annear and others 2002); scouring of redds, reduced oxygen delivery to redds, and reduced transport of metabolic wastes from redds. Lanigan et al. (2012) observed that artificial water withdrawals affect summer instream flow. Adequate instream flow is essential for maintaining habitat conditions for rearing juvenile salmon and steelhead. Even when streams are not completely dewatered, substantial reductions in juvenile growth may result from reduced habitat volume and productivity of invertebrate prey. The BLM should develop and implement measures to ensure the maintenance of adequate instream flows needed to support salmon and steelhead recovery and healthy aquatic habitat conditions.

An understanding of the role of large woody debris (LWD) in riparian areas has developed since enactment of the NWFP. Large downed trees in riparian areas provide important terrestrial habitats for riparian depended species as well as the importance of naturally occurring upslope slope failures in the colluvial zone for the delivery of wood and coarse sediment to aquatic habitats.

Lanigan et. al. (2012) found that high water temperatures were a principal factor in low-scoring watersheds. The BLM should identify stream reaches impaired by excessive water temperatures and adopt management measures to recruit shade canopy, promote natural pool formation processes, control excessive sediment delivery, and address the effects of water withdrawals.

Notwithstanding the importance of continuing to maintain and restore aquatic habitat under the NWFP, as recognized in both the 10-year NWFP review (summarized in Rapp, 2008) and the 15-year NWFP review (summarized in Davis et. al. 2011) improvements to the RMPs are warranted in the areas descried above. The DEIS should consider, as a discrete alternative, continued management under the NWFP and ACS with enhancements as informed by the adaptive management framework of the NWFP, that increase the likelihood that the ACS objectives will be met.

Coarse-scale Aquatic Conservation Planning

The purposes of the NWFP reflect in part statutory and public interest mandates, such as recovery of listed species, protection of water quality, management of peak run-off, and sustainable timber production, which require coarse-scale planning across multiple ownerships. Coarse-scale land management planning enhances landowner coordination and allows assessment of broad-scale factors such as reserve size, distribution, and connectivity (Carroll et. al. 2009). Any alternative adopted must continue and enhance a robust coarse-scale aquatic conservation planning framework consistent with the principles of the NWFP ACS.

Land Consolidation

The checkerboard pattern of federal land ownership is an oft-cited obstacle to management on the lands subject to the NWFP.[4] The DEIS should include

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[4] *See* NMFS. 2012. Public Draft Recovery Plan for Southern Oregon/Northern California Coast Coho Salmon (*Oncorhynchus kisutch*). National Marine Fisheries Service. Arcata, CA. p. 1-6. (*". . . the Northwest Forest Plan has important benefits for coho salmon, but that its overall effectiveness in conserving SONCC coho salmon is limited by the extent of federal lands and the fact that Federal land ownership is often not*

an analysis of the use of parcel swaps and other procedures for land consolidation which help to achieve the goals of the ACS.

Channel Morphology and Stability

Land management effects on watershed-scale hydrology and the frequency and magnitude of peak discharge affect aquatic habitat conditions that strongly affect salmonid populations. The DEIS should include a detailed analysis of the impacts of the alternatives on watershed hydrology and patterns of discharge. Impacts should be analyzed at spatial scales where impacts are pronounced and ecologically significant. Analysis should not be limited to the effects of canopy reductions, but also address soil compaction, roads and road use, logging, and grazing. The DEIS should also disclose the uncertainties and limitations of its analysis.

Sediment and Erosion Control

The potential adverse effects of road condition and use on aquatic habitats through accelerated transport and deliver of fine sediments is well known. The DEIS should include a detailed analysis of the effects of the use of the existing road network, construction of new roads, and the improvement and decommissioning of existing roads. The DEIS should address the management of the road network through a detailed erosion control planning framework that includes specific standards and design criteria, schedules for assessment and monitoring, prioritization of maintenance and repair actions, implementation scheduling, and implementation and effectiveness monitoring.

Restoration

Aquatic habitat restoration projects should be a key component of any adopted alternative. BLM should develop alternatives for a continued and improved aquatic habitat restoration program included an assessment of required resources and identification of funding sources and other support. In doing so**,** the DEIS should inventory and evaluate remaining passage barriers, evaluate the availability of materials (e.g. sound large diameter boles and rootwads) for habitat enhancement, and assess the contributions of a highly active stewardship program on economics and community stability.

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uniformly distributed. . . In addition, in some areas Federal lands are distributed in a checkerboard fashion, which results in fragmented landscapes.")

Fire

Lanigan et. al. (2012) attributed the greatest negative changes in AREMP watershed conditions scores to fires. However, recent investigations have concluded fire effects on stream habitats are either small or beneficial (Carroll et. al. 2009). Wildfire may result in periodic inputs of large woody debris and support increased productivity of benthic invertebrates (Carroll et. al. 2009). In part due to the low likelihood that a catastrophic wildfire will intercept treated lands, stand treatment may not be an effective means of reducing the potential occurrence or severity of wildfire. (Carroll et. al. 2009). Where the DEIS contemplates management changes to address fire, such as increased thinning, pre-commercial mechanical treatments, or prescribed burning, these activities should be evaluated in light of the actual efficacy of the proposed treatments and their potential effects on aquatic habitats which may arise from ground disturbance, soil compaction, LWD recruitment, and erosion and sediment delivery from roads and road use.

Thinning

Increased thinning has been proposed as a means to increase timber harvest, accelerate the development of mature forest habitat characteristics, and reduce the incidence and severity of wildfire. Restricting thinning to young stands does not dispose of the need to evaluate and mitigate soil erosion and compaction impacts (Carroll et. al. 2009). Where the DEIS contemplates continuing or increasing thinning, thinning should be evaluated in light of the potential effects on aquatic habitats which may arise from ground disturbance, soil compaction, LWD recruitment, and erosion and sediment delivery from roads and road use.

Again, the PRC appreciates the opportunity to provide these scoping comments for the proposed revisions to the Western Oregon RMPs. PRC is highly interested in assisting the BLM with the development, evaluation and selection of management alternatives. Please direct contacts to Greg Haller, Conservation Director by phone at (503) 228-3555 and by email at greg@pacificrivers.org.

Sincerely,

John Kober, Executive Director

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