

Coast Range Association  
Comments on the BLM's  
Resource Management Plans (RMPs)  
&  
Draft Environmental Impact Statement (DEIS)

Part 3.

A second set of Coast Range Association submitted comments.

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# Coast Range Association

*Building just  
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communities that  
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and the natural world.*

[www.coastrange.org](http://www.coastrange.org)

CRA  
PO Box 2250  
Corvallis, OR 97339



August 20, 2015  
Jerome E. Perez  
State Director  
Washington/Oregon  
Bureau of Land Management  
P.O. Box 2965  
Portland, Oregon 97208

ATTN: Mark Brown  
Submitted via Email: <blm\_or\_rmpwo\_comments@blm.gov>

RE: This document is a second set of Coast Range Association comments on BLM Draft 2015 Resource Management Plan/EIS for Western Oregon

On behalf of hundreds of member households and thousands of supporters throughout the Coast Range, Oregon and the nation, the Coast Range Association (CRA) submits these comments addressing the Draft Environmental Impact Statement (DEIS) for the Resource Management Plans (RMP) for BLM forests and watersheds in Western Oregon.

1. The DEIS/RMP violates the ESA, NEPA and FLPMA because it failed to analyze ongoing impacts to bull trout and/or bull trout critical habitat.

The DEIS/RMP failed to identify locally relevant management direction, specific management objectives for critical habitat, and site specific interagency coordination needed to recover bull trout.

The DEIS:218 states:

“The amount of critical habitat for non-salmonid fish species or resident salmonid fish species on BLM administered lands is less than 5 percent of all critical habitat for fish in the decision area (**Table 3-50**). The BLM has very limited ability to affect these non-salmonid and resident salmonid fish species or their critical habitat through forest management, infrastructure maintenance, or habitat manipulations. The analysis contained herein will therefore focus on anadromous salmonids and effects to their habitat.”

Table 3-50 (DEIS:218) identifies 3.6 miles of bull trout critical habitat. The BLM cannot exempt itself from legally required NEPA analysis for ESA listed species or FLPMA requirements for planning documents to provide specific management direction to recover the federally listed bull trout. The assertions that bull trout can be dropped from analysis and management direction in the 2015 RMP/DEIS because the amount of bull trout critical habitat in the planning area is small compared to anadromous fish habitat is not only absurd but is not based on the best available science. Equally absurd is the implication in Table 3-50 that bull trout can be dropped from NEPA analysis because the amount of critical bull trout habitat affected is affected is small compared to total bull trout critical habitat in the entire USA. Of particular relevance to this DEIS/RMP is 75FR6394 which states:

“For example, in the Klamath Basin Recovery Unit where threats to bull trout are greatest, we are designating all habitat known to be occupied at the time of listing that contains the physical or biological features essential to the conservation of the species and that may require special management considerations or protection, and we are also designating a substantial proportion of unoccupied habitat outside of the geographical area occupied by the species at the time of listing that has been determined to be essential for bull trout conservation. Our primary consideration for designating critical habitat for occupied areas was to protect species strongholds for spawning and rearing and FMO habitats. Our primary consideration for designating most of unoccupied areas we are including in this designation was to restore connectivity among populations by protecting FMO habitats.”

We assert that this 2015 RMP/EIS must identify “special management considerations or protection” for bull trout and analyze the impacts regardless if they are beneficial or detrimental. The kinds of coordination with other agencies and private entities need to be identified because of the mobility of the species to cross property ownerships and the need identified by USFWS to restore connectivity.

Restoration of connectivity for bull trout creates the potential to damage Oregon spotted frog habitat or indirectly kill OSF. The likely presence of Oregon spotted frogs and/or OSF critical habitat along streams further demonstrates the need for clear direction in the RMP for bull trout management when critical habitat for bull trout and OSF overlap. The listing for OSF found that stream improvement projects for fish have damaged OSF habitat. The RMP/EIS needs to document the adverse impact of past stream projects to OSF and identify management direction to avoid this conflict in the future.

The DEIS: 908 states:

***“Management Objectives for non-forested lands in the decision area east of Highway 97***

- Provide for conservation of Special Status fish and other Special Status aquatic species.
- Provide for the riparian and aquatic conditions that supply stream channels with shade, sediment filtering, leaf litter and large wood, and stream bank stabilization.
- Maintain and restore water quality.
- Maintain and restore access to stream channels for all life stages of fish species.

- Maintain and restore the proper functioning condition and ecological site potential of riparian and wetland areas.”

These are well intentioned and necessary objectives but the RMP fails to describe how these objectives will be accomplished for Klamath Basin bull trout. The RMP fails to meet its purpose and need because it does not identify contributions to the recovery of bull trout in either the decision area or the planning area. Similarly, the DEIS lacks analysis of the effectiveness of biological assessments or biological opinions for bull trout. Delaying required Section 7 consultation process hinders our ability to make substantive comment about bull trout for this DEIS. The DEIS fails to disclose that due in part to the failure of the RMP to make actual contributions to the recovery of bull trout in the Klamath Basin, the Klamath Basin bull trout will likely be upgraded to endangered in the short term and likely extirpated in the planning area over the next 100 years.

## 2. The 2015 DEIS/RMP violates the ESA, NEPA and FLPMA because it failed to analyze impacts to the endangered shortnose sucker and/or shortnose sucker critical habitat.

The DEIS/RMP failed to identify management direction for shortnose sucker , specific management objectives for shortnose sucker critical habitat, and site specific interagency coordination needed to recover shortnose sucker in the Klamath Basin.

The DEIS:218 states:

“The amount of critical habitat for non-salmonid fish species or resident salmonid fish species on BLM administered lands is less than 5 percent of all critical habitat for fish in the decision area (**Table 3-50**). The BLM has very limited ability to affect these non-salmonid and resident salmonid fish species or their critical habitat through forest management, infrastructure maintenance, or habitat manipulations. The analysis contained herein will therefore focus on anadromous salmonids and effects to their habitat.”

Table 3-50 (DEIS:218) identifies 9.0 miles of shortnose sucker critical habitat on DEIS/RMP “decision” lands but fails to indicate the location of those 9.0 miles. Failure to identify the location and water body names of shortnose sucker critical habitat demonstrates the inadequacy of the DEIS and also substantially hinders our ability to make substantive comment for this DEIS.

The DEIS cannot exempt itself from legally required NEPA analysis for ESA listed species and critical habitat occurring on BLM decision area lands. The assertions that shortnose sucker can be dropped from DEIS “fish” analysis because the amount of shortnose sucker critical habitat in the planning area is small compared to anadromous fish habitat is not only absurd but is not based on the best available science. Equally absurd is the implication in DEIS:218 Table 3-50 that shortnose sucker can be dropped from this DEIS analysis because the amount of critical shortnose sucker habitat on BLM lands is small (4.3%) compared to total shortnose sucker critical habitat in the

Klamath Basin.

The DEIS:907-909 identifies management direction for “all water features” including riparian areas, but the management direction seems to be targeted for salmonids and fails to identify management direction for shortnose sucker. The DEIS:909 states: “Manage livestock grazing where listed fish species occur to prevent direct impacts to spawning and incubation.” The DEIS is defective because it has no biological analysis of proposed turn out dates in allotments with shortnose sucker critical habitat to determine if the grazing season of use would comply with this directive (DEIS: 1235-1233).

The DEIS:916 states as a management objective for fisheries to “improve the distribution and quantity of high quality fish habitat across the landscape for all life stages of ESA-listed, BLM Special Status Species, and other fish species.” The DEIS/RMP is defective because it fails to identify conservation actions needed to make substantial contributions towards the recovery of shortnose sucker. The DEIS identifies existing exclosures, some of which, were apparently constructed to protect shortnose sucker from livestock impacts but the effectiveness of these exclosures for improving habitat for shortnose sucker is not described (DEIS 942-943). The DEIS/RMP is also defective because it did not consider the need for additional exclosures to protect all BLM shortnose sucker critical habitat from grazing impacts (USDI FWS 2012b:73768) and other conservation actions identified in the 2012 Revised Recovery Plan for the Lost River Sucker and Shortnose Sucker (*Deltistes luxatus* and *Chasmistes brevirostris*).

The BLM cannot exempt itself from FLPMA and ESA requirements for the Klamath Falls Resource Area RMP to provide specific management actions to recover the endangered shortnose sucker. The DEIS/RMP fails to meet its purpose and need because it does not identify adequate specific contributions for the recovery of endangered shortnose suckers in either the decision area or the planning area. Similarly, the DEIS lacks analysis of the effectiveness of previous biological assessments or biological opinions for endangered shortnose suckers relevant to this 2015 planning process. Delaying required Section 7 consultation process (e.g., Biological Assessments ) hinders our ability to make substantive comment about endangered shortnose suckers for this DEIS (see DEIS:869).

The DEIS/RMP is defective because it fails to disclose that due in part to the failure of the DEIS/RMP to identify and require substantial and effective contributions to the recovery of endangered shortnose suckers in the Klamath Basin, the endangered shortnose sucker will likely be extirpated in the decision area over the next 20-100 years. The endangered shortnose sucker requires active conservation measures to stave off local extirpation. We would like to remind BLM that its failure to take active and coordinated conservation efforts to protect and restore sage grouse ecosystems in the 1970s- 1980s resulted in the unanticipated extirpation of Lakeview District Klamath Falls Resource Area sage grouse by the mid 1990s.

3. The 2015 DEIS/RMP violates the ESA, NEPA and FLPMA because it failed to adequately analyze impacts to the threatened Oregon spotted frog and/or Oregon spotted frog critical habitat.

The DEIS/RMP failed to adequately identify management direction for Oregon spotted frog, failed to identify specific management objectives for Oregon spotted frog critical habitat, and failed to identify site specific interagency coordination needed to recover Oregon spotted frog in the Klamath Basin.

The DEIS is defective because it fails to disclose that the Oregon spotted frog was listed as a threatened species on August 29, 2014 (79FR51658-51710) and revised proposed critical habitat was published on June 18, 2014 (79FR34685-34696). The 79FR34688 states:

“New information we received from the U.S. Forest Service indicated the proposed critical habitat unit did not include the full extent of occupancy by Oregon spotted frogs (T. Smith, USFS, pers. comm. 2014). Therefore, we propose to include an additional 17 acres (7 ha) in this unit. Upon consideration of the information we received, this refinement includes an additional portion of the Buck Lake drainage system of canals, as well as Spencer Creek from Buck Lake downstream approximately 1.6 miles (2.6 km), ending at the intersection of U.S. Forest Service Road 46 and Clover Creek Road. The additional acreage is occupied by the Oregon spotted frog and contains the essential physical or biological features. *Fifteen acres (6 ha) are managed by the Bureau of Land Management and Fremont-Winema National Forest, and 2 acres (1 ha) are privately owned.* The essential features within the additional acres may require special management considerations or protection to ensure maintenance or improvement of the existing nonbreeding, breeding, rearing, and overwintering habitat; aquatic movement corridors; or refugia habitat, and to address any changes that could affect these features.”  
(emphasis added)

The DEIS:829 identifies indirect adverse impacts from livestock grazing but fails to identify direct mortality from trampling. The DEIS:829-831 fails to disclose impacts to Oregon spotted frogs and critical habitat from custodial grazing in the Buck Lake allotment (DEIS:1227) or the potential benefits to Oregon spotted frogs from Alternative D (no grazing). We assert that a 2000 Rangeland Health Assessment is inadequate to base livestock and other impact assessment to Oregon spotted frogs and/or critical habitat. Rangeland Health Assessments, although useful for identifying obvious impacts, were not designed for assessing impacts to Oregon spotted frogs. For example, the DEIS/RMP is defective because it does not require turn out dates of livestock into Oregon spotted frog critical habitat be delayed until after the Oregon spotted frogs have metamorphosed. The DEIS/RMP is defective because it fails to provide relevant context (as per NEPA) with baseline population monitoring or habitat monitoring of condition/trend in the planning area (e.g. Parsnip Lakes, Wood River Wetlands). The DEIS/RMP is defective because it has failed to provide any monitoring data for Oregon spotted frogs from the Buck Lake/Spencer Creek population. The DEIS/RMP must include specific habitat and population monitoring objectives for the Buck Lake/Spencer Creek population.

We are concerned that in February 2014, the BLM transferred a Section 15 livestock grazing lease for the Buck Lake Allotment (#00104) with a CE that did not acknowledge the presence of Oregon spotted frog and critical habitat within the Buck Lake Allotment (USDI BLM 2014). Due to multiple ownerships of Oregon spotted frog critical habitat in the Buck Lake/Spencer Creek area (79FR34695;USDI BLM 2014) it would seem prudent for the DEIS/RMP to require active coordination with the Forest Service, ODFW, USFWS private land owners, and permittees to

jointly protect and improve habitat for Oregon spotted frog in the Buck Lake/Spencer Creek area. Merely committing to the control of reed canarygrass (which may or may not be a limiting factor for Buck Lake/Spencer Creek Oregon spotted frogs) is not adequate conservation for Oregon spotted frogs (DEIS:830).

The DEIS:1069 (Table F-2) lists the assumed existing Tunnel Creek ACEC that includes Oregon spotted frog critical habitat. Grazing management is listed as “open with stipulations: Fencing to keep cattle out of sensitive wetland areas”. The DEIS:942 Table B-8 lists a Tunnel Creek Exclosure and Surveyor Campground Exclosure in the Buck Lake Allotment that would apparently exclude livestock from Oregon spotted frog critical habitat. The DEIS:1085 (Table F-3) lists potential Tunnel Creek ACEC that is “relevant and important” because it has Oregon spotted frogs. The DEIS is defective because it does not explicitly identify the benefits of existing Tunnel Creek ACEC and “potential” Tunnel Creek ACEC for the Oregon spotted frog. The DEIS/RMP:942 is defective because it lacks a conservation action that would identify new fencing that would exclude livestock from the entire expanded Tunnel Creek ACEC and presumably all BLM Oregon spotted frog habitat in the Buck Lake area.

The DEIS fails to discuss the effectiveness of existing or potential livestock exclosures as it relates to Oregon spotted frog habitat and population viability in the Buck Lake/Spencer Creek area.

The final listing of Oregon Spotted Frog (USFWS 2014:51667) states:

“Surveys conducted at Buck Lake suggest a population decline and have documented most recently small numbers of egg masses (38 masses in 2010), or the equivalent of 76 breeding individual (male and female) (BLM 2012). Additional information indicates that suitable habitat occurs downstream of Buck Lake within Spencer Creek (Smith 2014, pers. comm.). The minimum population estimate for this sub-basin is currently estimated to be 112 breeding individuals suggesting drastic population declines since 1998.”

The DEIS/RMP is defective because it relies primarily on passive management for the Buck Lake/Spencer Creek population of Oregon spotted frogs (e.g. livestock exclusion). The DEIS fails to state that passive management is likely not adequate to prevent local extirpation due to ongoing drought, water withdrawals, small population size, and biotic factors (bull frogs, disease). A similar isolated population of Oregon spotted frogs at nearby Parsnip Lakes has declined to 2 egg masses in 2015, even though cattle have been removed from Parsnip Lakes (Personnel communication R. Nawa [KS Wild] with Michael Parker [SOU]). Specifically, the DEIS/RMP has failed to identify the need to develop “competitor free” open water habitat for Oregon spotted frogs at Buck Lake to supplement existing open water habitat (e.g. BLM development of Wood River Wetlands that benefitted Oregon spotted frogs, although bull frogs are believed to be factor for recent declines in that OSF population). Although BLM staff may be pursuing conservation of Oregon spotted frogs at Buck Lake/Spencer Creek, these ongoing efforts, specific management direction, fencing, construction of new habitats, reduction of competitors, and annual monitoring need to be explicitly stated in the DEIS:905-985. The DEIS/RMP apparent reliance on Rangeland Health Assessments in the Buck Lake “custodial” allotment completed in 2000 is clearly inadequate for conserving the Oregon spotted frog. The DEIS:936 stated wildlife objective: “Conserve and recover ESA-listed species and the ecosystems on which they depend so that ESA protections are no longer needed for those species” is not being met. The DEIS:936 fails to identify a time table for implementing active



conservation to halt and reverse declines of ESA-listed Oregon Spotted frogs at Buck Lake and also to systematically search BLM lands for undiscovered populations.

The DEIS:830 states that “there are 508 acres of [Oregon spotted frog] habitat on BLM administered lands, and 67 percent of that habitat occurs in large habitat patches.” The DEIS/RMP is defective because it has not required that these possible Oregon spotted frog habitats be systematically searched in a timely manner for Oregon spotted frogs so that the species and its habitat is fully protected with needed conservation actions.

#### 4. The 2015 DEIS/RMP violates NEPA and FLPMA because it failed to analyze impacts to the green sturgeon (*Acipenser medirostris*) that spawns in the Rogue River (Northern Distinct Population Segment).

The DEIS/RMP failed to identify management direction for green sturgeon, specific management objectives for green sturgeon, and site specific interagency coordination needed to prevent the need to federally list the Northern DPS green sturgeon.

The DEIS:218 states:

“The amount of critical habitat for non-salmonid fish species or resident salmonid fish species on BLM administered lands is less than 5 percent of all critical habitat for fish in the decision area (**Table 3-50**). The BLM has very limited ability to affect these non-salmonid and resident salmonid fish species or their critical habitat through forest management, infrastructure maintenance, or habitat manipulations. The analysis contained herein will therefore focus on anadromous salmonids and effects to their habitat.”

The BLM cannot exempt itself from NEPA analysis for the green sturgeon.

Table 3-50 contains information about the threatened Southern Distinct Population Segment green sturgeon that spawns in the Sacramento River and sometimes enters the lower ends of large coastal rivers such as the Rogue River. The more relevant green sturgeon that spawns in the Rogue River is in the Northern Distinct Population Segment. The green sturgeon in the Rogue River is a ESA species of concern. The NOAA fisheries states that “Species of Concern are those species about which we have some concerns regarding status and threats, but for which insufficient information is available to indicate a need to list the species under the Endangered Species Act (ESA). We wish to draw proactive attention and conservation action to these species.” (emphasis added)

The Rogue River is one of 3 remaining spawning rivers for the Northern DPS of green sturgeon. The DEIS is defective because it fails to alert the decision maker and the public that any diminishment of the Rogue River population of green sturgeon would certainly trigger a formal listing process. Thus, the BLM must identify an active conservation role in the management of green sturgeon in this DEIS/RMP.

The DEIS analysis of large wood contribution to streams is irrelevant to green sturgeon spawning in the mainstem Rogue River.

The DEIS/RMP is defective because it has failed to at least conference with NOAA Fisheries in a timely manner to identify specific conservation actions in this RMP/DEIS to ensure that the Northern DPS green sturgeon does not become threatened with extinction.

The DEIS:906-908 and 916 lists management objectives, management direction and fish related restoration actions. The DEIS/RMP fails to describe how these objectives, direction and restoration will be accomplished for green sturgeon, an ESA anadromous species of concern. The BLM cannot exempt itself from FLPMA requirements for the Medford District to provide species specific management actions to ensure that the green sturgeon does not become threatened with extinction. The DEIS/RMP is defective because it fails to meet its purpose and need by failing to identify specific contributions for the management of green sturgeon in either the decision area or the planning area. Similarly, the DEIS is defective because it lacks analysis of the effectiveness of DEIS management objectives, management direction and fish related restoration actions for green sturgeon. Delaying or downright refusal to conference with NOAA fisheries regarding conservation needs of green sturgeon hinders our ability to make substantive comment about green sturgeon for this DEIS. The DEIS is defective because it fails to disclose that due in part to the failure of the DEIS/RMP to identify actual contributions to the conservation of green sturgeon in the Rogue River, the green sturgeon is likely to become threatened with extinction over the next 100 years. ESA species of concern such as the green sturgeon require spatially explicit conservation measures in this RMP/DEIS to stave off the need for threatened status.

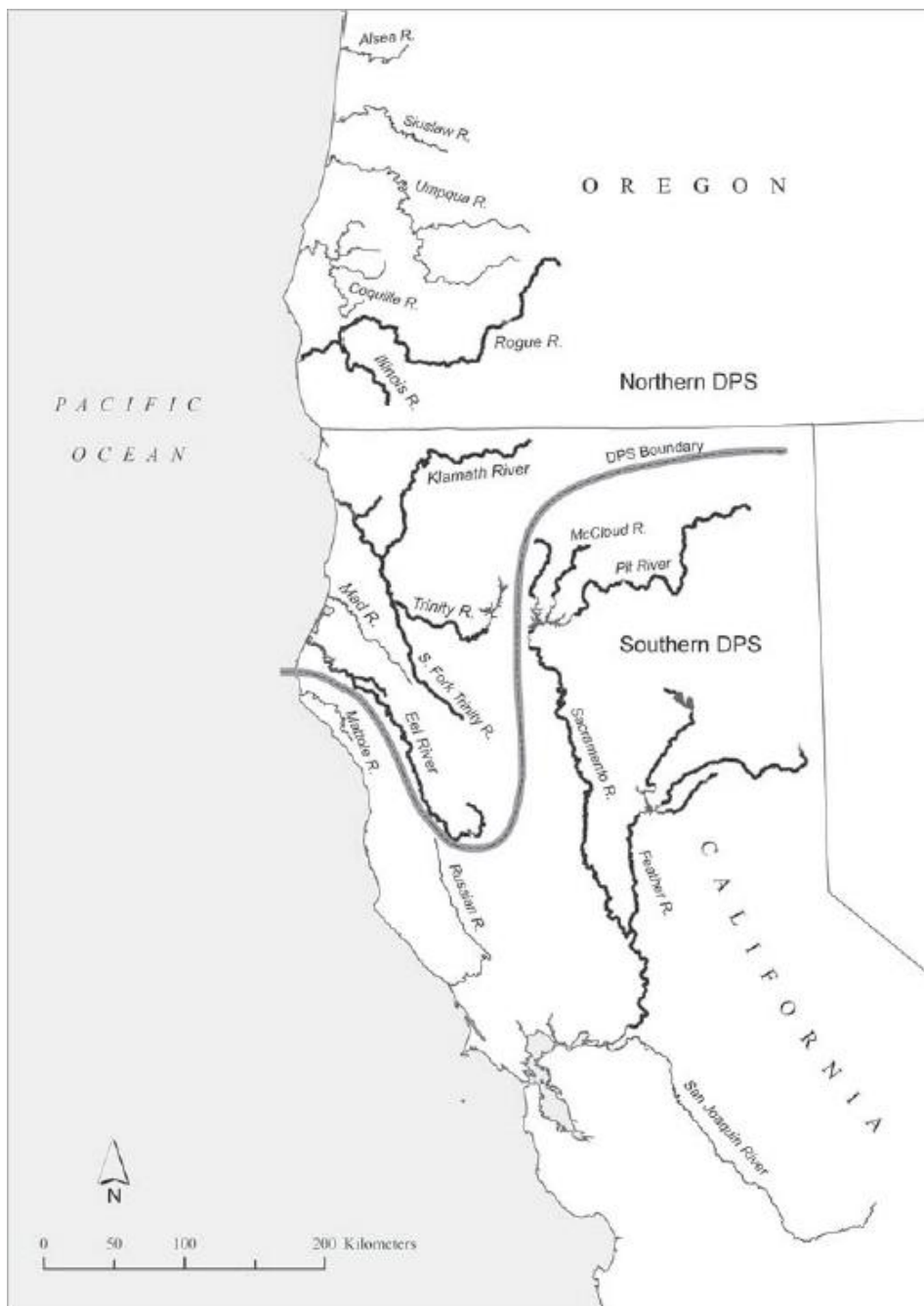


Figure 1. The Northern DPS green sturgeon is found in the Rogue River, Oregon. The Northern DPS green sturgeon is a ESA species of concern. The Southern DPS green sturgeon from the Sacramento River is listed as threatened. Green sturgeon are anadromous fish. They only spawn in natal rivers (e.g. Rogue River) but make annual feeding migrations to the ocean and other river estuaries (Lower Columbia River, Coos Bay).

[http://www.nmfs.noaa.gov/pr/images/fish/greensturgeon\\_dps\\_map.jpg](http://www.nmfs.noaa.gov/pr/images/fish/greensturgeon_dps_map.jpg)

New information from Mora et al. (2015) estimated the Rogue River population at 236 adults (150-424). The DEIS/RMP is defective because it fails to coordinate and contribute towards population monitoring or contribute towards water quality monitoring in spawning/rearing areas.

## 5. The DEIS/RMP is defective because it failed to evaluate effects to western pond turtle or provide for its special conservation needs.

The western pond turtle is a FWS Species of Concern and BLM Sensitive species because of the considerable degradation and loss of wetland habitats within the state, and the presumed unsustainably high level of nest and hatchling depredation.

The FWS is currently evaluating a petition To list the western pond turtle as an endangered or threatened species under the ESA. The FWS states that “based on our review of the petition and sources cited in the petition, we find that the petition presents substantial scientific or commercial information indicating that the petitioned action may be warranted for the western pond turtle (*Actinemys marmorata*) based on Factor A.” (80FR16262)

Federal agencies such as the BLM are required to take actions to prevent the need to list species. Rosenberg (2009) identified loss of habitat, recreation disturbance, road mortality, and invasive riparian vegetation as some of the threats relevant to the RMP. Rosenberg 2009:40 states that “loss of deep pools from streams due to sedimentation and loss of large structure such as woody debris may have reduced aquatic habitat following timber harvest (Todd 1999:44).” Stream restoration can destroy or prevent the development of open habitats that provide turtle nesting habitat as well as sunny areas within the stream environment to allow for foraging and basking.

The western pond turtle requires aquatic habitat for feeding/basking and open upland habitat for nesting/overwintering. Rosenberg et al 2009: recommends the following:

- Maintain and increase deep pools in streams
- Provide shallow water habitats with abundant aquatic vegetation for hatchling rearing habitat
- On southern exposures, provide sparse vegetation structure adjacent to aquatic habitat for nesting within 200 m of aquatic habitat; remove all woody plants in designated nesting areas if appropriate
- Provide open fields or open woodlands within 200 m of stream and river habitats for over-wintering
- Consider juxtaposition of management actions in terrestrial and aquatic habitat in relation to roads and recreation uses to minimize negative effects

The RMP proposed and ongoing recreation activities do not consider restrictions to protect western pond turtles nor does the DEIS evaluate recreation effects to turtles. One area of concern are sandy open areas used by recreational rafters on the Rogue River that may be in conflict with successful nesting due to human disturbance and dog predation. Grazing and off-road vehicle use need to be seriously considered for elimination from riparian reserves that may be used by turtles for feeding, nesting, overwintering, and estivation.

The RMP fails to discuss the consequences of reducing riparian reserves from 2 tree width to 1 tree width along fish streams and reduced riparian reserves adjacent wetlands/ponds for wintering

habitat (all action alternatives). The 2 tree riparian reserves would include most required nesting/over wintering habitat. Flexibility is needed in riparian reserve management to judiciously remove forest canopy to maintain and enhance known or suspected nesting habitat. The RMP/DEIS needs to recognize the special needs of western pond turtles for open sparsely vegetated nesting/wintering habitat adjacent streams and ponds. Creating dense canopy forests everywhere along streams is an anathema for turtles.

The RMP/DEIS fails to provide coordination with ODFW, FWS, US Forest Service and others to monitor western pond turtles to establish baseline populations and trends. Inventories are needed to locate nesting and overwintering areas such that they can be protected from predation or enhanced with vegetation management. Most importantly a schedule for conservation actions is needed.

## 6. The Klamath OR/CA geographic subdivision of sage-grouse populations is illustrated in Hagen 2011:19.

At a minimum BLM lands within this geographic subdivision must be considered Greater Sage-Grouse habitat as per IM 2012-044 and also considered for ODFW recommended introduction.

The DEIS:714 states that “[c]urrent threats to Greater Sage-Grouse include loss of habitat through urbanization, energy development, invasive species (e.g., juniper, cheatgrass), intensive grazing, and wildfire. Habitat for the Greater Sage-Grouse is large, intact expanses of sagebrush shrubland (BLM 2013b).” These threats need to be reduced and habitat improved to where reintroduction is possible. Successful reintroduction will require some subset of “Description of the Proposed Plan Goals and Objectives by BLM Resource Program” (USDI BLM 2015:14-17) be stated in the Western Oregon Draft RMP/EIS. Specifically, “Goal SSS 1: Conserve, enhance, and restore the sagebrush ecosystem upon which Greater Sage-Grouse populations depend in an effort to maintain and/or increase their abundance and distribution, in cooperation with other conservation partners” is an appropriate goal for Lakeview District Klamath Falls Resource Area because of potential of increasing Greater Sage-Grouse abundance and distribution. (emphasis added) We further assert that the DEIS/RMP is defective because it failed to select a relevant subset of “Description of the Proposed Plan Actions by BLM Resource Program by BLM Resource Program” (USDI BLM 2015:2-19-2-58) for explicit inclusion in the Western Oregon Draft RMP/EIS for the Klamath OR/CA geographic subdivision of sage-grouse populations.

For example east side Klamath Resource area needs to include the following from USDI BLM 2015:2-16 “Objective LG/RM 1: Manage livestock grazing to maintain or improve Greater Sage-grouse habitat by achieving Standards for Rangeland Health (SRH).” Nearly all of the vegetation conservation goals and objectives for sage grouse habitat in USDI BLM 2015(2)15-16 would merit inclusion in the Klamath Falls RMP.

The DEIS:714 states that “[m]anagement direction common to all alternatives would treat and remove encroaching, invasive juniper within Greater Sage-Grouse habitat in the decision area similarly among all alternatives.” The Western Oregon RMP needs to identify conservation measures for actions in greater sage-grouse habitat because commercial juniper projects and other authorized activities in formerly occupied sage-grouse habitat are damaging potential sage-grouse

habitat. For example, the Bly Area Rangeland Health Standards assessment (USDI BLM 2007:16) stated that “It is likely that some of the most disturbed areas [from juniper removal] (e.g., skid trails, landings) will experience a permanent exotic annual species component due to this disturbance and never fully restore.” Juniper removal for commercial purposes is degrading sage-grouse habitat by increasing “permanent exotic annual species”. This is relevant because the Bly Area Rangeland Health Standards assessment (USDI BLM 2007:22) states that “there is also an historic sage grouse lek site that was active in the early 80's in the Swede Cabin allotment (T36S R15E Sec 32 SESE).”

## 7. The DEIS fails to provide full evaluation of the effects of the RMP on fishers.

Cumulative loss of fisher habitat from private land clear-cutting, wild fire, and RMP logging are not evaluated in the context of fisher persistence over the next 40 years. The DEIS did not use the best available science required for section 7 conferencing/consultation. Habitat protection measures are inadequate and do not specify how they would be implemented.

The Proposed Rule to list fisher (USDI FWS 2014c:60431) states:

“Most Federal activities must comply with the National Environmental Policy Act of 1969, as amended (NEPA) (42 U.S.C. 4321 et seq.). NEPA requires Federal agencies to formally document, consider, and publicly disclose the environmental impacts of major Federal actions and management decisions significantly affecting the human environment. NEPA does not regulate or protect fishers, but requires full evaluation and disclosure of the effects of Federal actions on the environment.”

The DEIS:701-70;1415-1420 fails to provide full evaluation of the effects of the RMP on fishers. The DEIS failed to use the Draft Species Report for Fisher (USDI FWS 2014d) to guide analysis and impact assessment. The Draft Species Report is the best available science for assessing forest management impacts to fisher. Since the DEIS did not use the best available science in the Draft Species Report for Fisher, the DEIS usefulness for section 7 consultation with FWS is questionable. The proposed listing for fisher (USDI FWS 2014c:60437) states that “[s]ection 7(a) of the Act requires Federal agencies to evaluate their actions with respect to any species that is proposed or listed as an endangered or threatened species and with respect to its critical habitat, if any is designated... Section 7(a)(4) of the Act requires Federal agencies to confer with the Service on any action that is likely to jeopardize the continued existence of a species proposed for listing or result in destruction or adverse modification of proposed critical habitat.”

The DEIS:705 states: “[t]he action alternatives would have a 1 to 3 percent loss of denning habitat in the first decade (and in the second decade for Alternative C), but additional habitat would develop in subsequent decades that would surpass current conditions by 2033 (*Appendix R*). Similarly, total fisher habitat and resting habitat would decrease in the first two decades under the action alternatives (by 3-5 percent and 10-15 percent, respectively), but additional habitat would develop in subsequent decades that would surpass current conditions by the year 2043. In

contrast, the No Action alternative would lead to a continual decrease in total fisher habitat, denning habitat, and resting habitat over 50 years (**Figure 3-170**)." Appendix R:1418 (Table R-9) lists the decreased acres of fisher habitat for the first ten years which ranges from 7,269 acres in Alt B to 33,907 acres in No Action.

The DEIS analysis failed to report the severity of the alternatives in terms of habitat that is likely to be lost over the next 40 years (USDI FWS 2014c:60428) because the DEIS apparently modeled "ingrowth". The USDI 2014c:60430 reports that FWS analysis of habitat loss did not include "ingrowth" although they acknowledge ingrowth is occurring on federal lands (USDI FWS 2014d:84-92). We assert that because the DEIS modeled "ingrowth" the analysis is not comparable to analysis in USDI FWS 2014d which is the best available science. This is important because modeling ingrowth would trade off ongoing habitat loss acres when it is not known to what extent ingrowth would become fisher habitat of equal value, especially if the ingrowth acres were previously clear-cut. The DEIS must report the total amount of acres of habitat lost over a 40 period to be consistent with best available science.

The Proposed Listing page 60429 states "[v]egetation management techniques of the past (primarily timber harvest) have been implicated as one of the two primary causes for fisher declines across the United States. Many fisher researchers have suggested that the magnitude and intensity of past timber harvest is one of the main reasons fishers have not recovered in Washington, Oregon, and portions of California, as compared to the northeastern United States (Service2014, pp. 54–56)." The DEIS fails to describe the kinds of timber harvest in fisher habitats and how it would adversely affect specific habitat needs of fisher.

The DEIS fails to take a hard look at cumulative impacts from ongoing private land clear-cutting, habitat losses from fire and proposed BLM logging. We assert that projected intensive private land clear cutting of existing fisher habitat and losses from fire will be a major stressor for fisher in the planning area and that additional BLM logging over the same 40 year period could result in jeopardizing the continued existence of fisher.

The Draft Species Report p. 15 states: "Throughout their range, fishers are obligate users of tree or snag cavities for dens where they give birth (reviewed by Lofroth *et al.* 2010, p. 119; Coulter 1966, p. 81). Kits may be moved from their natal den to numerous maternal den locations before they are weaned; as a result a denning female requires multiple den trees per year (Arthur and Krohn 1991, p. 382; Paragi *et al.* 1996a, p. 80; Higley and Matthews 2006, p. 7; Powell 1993, p. 67). Once weaned, the kits stay with the female, and consequently the family unit utilizes multiple structures (for example, tree cavities, hollow logs, and log piles) within the female's home range until juvenile dispersal in the fall or winter (Truex *et al.* 1998, p. 35; Aubry and Raley 2006, p. 7, 12, 16–17; Higley and Matthews 2006, p. 6–7; Matthews *et al.* 2009, p. 9)." (emphasis added)

For all action alternatives the DEIS:937 says to "[r]etain structures used as known fisher natal and maternal den sites." The DEIS fails to explain how these structures would be found or how they would be retained.

For all action alternatives the DEIS:937 states that "Within the Applegate, Chetco, Illinois, Middle Rogue, Upper Klamath, Upper Klamath Lake, and Upper Rogue sub-basins, retain conifers and hardwoods that have structures that are typically used as denning or resting sites

(e.g., cavities, mistletoe, rust brooms) by fisher:

Live or dead conifers  $\geq 36$  inches DBH that have cavities, mistletoe, or rust brooms; Live or dead hardwoods  $\geq 24$  inches DBH that have cavities, mistletoe, or rust brooms “

The DEIS fails to explain exactly how these structures would be found or how they would be retained. Merely retaining standing conifers  $>36$ ” dbh and hardwoods  $>24$ ”dbh is not based on best available science. Smaller “cavity” trees would need to be retained if they are the largest ones available in a stand. In addition to standing trees, the RMP must also provide for retention of hollow logs and log piles.

For all action alternatives the DEIS:937 says to “[r]estrict activities that create noise or visual disturbance(s) above ambient conditions within 0.5 miles of known fisher natal and maternal den sites from February 1 to June 30.” The DEIS/RMP has failed to restrict OHV use that would disturb fishers. Ongoing heavy OHV use on designated and user created (existing) routes in the Medford District east of I-5 would be certain to disturb denning fishers. Instead of restricting OHV use to designated routes in the Medford District, the RMP would expand authorized use to existing (user created) routes on 661,357 acres that are currently limited to designated roads and trails (DEIS 1376 Table P-1 and DEIS:1386 Table P-8). We assert the initial RMP decision must be restrict OHV to designated routes in the Medford District (DEIS 1376 Table P-1) in all action alternatives to protect denning fishers, spotted owls and listed fishes.

The proposed fisher listing p. 60431 states: “Also, the National Forest and BLM units with anadromous fish watersheds provide riparian habitat conservation area buffers on either side of a stream, depending on the stream type and size. With limited exceptions, timber harvesting is generally not permitted in riparian habitat conservation areas, and the additional protection guidelines provided by National Forests and BLM may provide refugia and connectivity among more substantive blocks of fisher habitat.” (emphasis added) We assert that action alternatives that have reduced existing 2 tree riparian reserves to 1 tree riparian reserves are not responsive to the combined conservation needs of coho salmon, fisher, pond turtle, and spotted owls. The fisher would benefit immensely from 2 tree width reserves along fish streams. Reducing riparian reserves by 50% seriously reduces the action alternatives contribution towards recovery of fisher (i.e. it does not meet the purpose and need). Fishers prefer undisturbed riparian areas. The robust riparian reserves in the no action alternative would best meet the needs of fishers and this conservation needs to identified for fishers.

The Proposed Listing p. 60430 states “[v]egetation management that removes important habitat elements (such as den sites and canopy cover) has a greater effect on fishers than activities that maintain these elements.” The proposed listing p. 60429 states that “[b]ecause of the similarity between fisher and northern spotted owl habitat requirements, we determined this to be one of the best sources of data to evaluate the potential effects of vegetation management on loss of fisher habitat on Federal lands throughout the analysis area. We used timber harvest acreage data, approved Timber Harvest Plans, and consultations to evaluate the stressor of current vegetation management on fisher habitat.”

Although not implied in the DEIS, BLM timber sale EAs frequently use maintenance of spotted owl NRF and dispersal habitat as a surrogate for protecting fisher habitat because of assumed similarities of species needs for canopy retention in older forests. The BLM must consider new



information that has found that instead of maintaining NSO and fisher habitat in recent BLM harvest units, the BLM marking and subsequent logging has actually caused NSO habitat to be downgraded and even removed. A three page letter dated August 15, 2014 from Dayne Barron (Medford BLM) to Roseburg Field Office Supervisor (FWS) states: “the actual actions resulted in the removal of approximately 25 acres of NRF habitat, downgrade of approximately 10 acres of NRF habitat and the removal of approximately 91 acres of dispersal habitat.” This is important because anticipated assertions by BLM (that maintaining spotted owl habitat also maintains fisher habitat through canopy retention standards) is not being implemented as stated in EAs and decision documents. The RMP/DEIS is not meeting the “purpose and need” for recovering fisher because it lacks a mechanism to ensure that canopy retention standards are met in harvest units.

A well-documented native fisher population is found primarily in the Medford BLM district (Planning Criteria:191). The DEIS lacks a spatially explicit analysis to identify lands with high habitat value and identify where specific conservation actions are needed. Fuels treatment projects are in conflict with fisher preferred habitat and spatially explicit analysis is needed to ensure that cumulative fuels treatment impacts do not harm fisher habitat. Current project level analysis simply assumes that project impacts are not important because there is abundant fisher habitat that is not being impacted. This is false and not scientifically valid. The DEIS lacks landscape scale spatially explicit analysis to identify high value habitat for fishers for protection and enhancement of “key elements”. The Draft Species Report for fisher has spatially explicit models to identify high value fisher habitat but the DEIS failed to use this “best available science”.

**8. The RMP/DEIS failed to analyze the effects of salvage logging, thinning, and fire suppression on wildfire dependent black-backed woodpeckers in the Medford and Lakeview District portion of planning area. The RMP failed to provide adequate post-fire snag retention standards for black-backed woodpeckers.**

The black-backed woodpecker is undergoing a federal status review for a possible proposed listing. The findings from the Federal Register notice (78FR21097)<sup>1</sup> states:

“On the basis of our determination under section 4(b)(3)(A) of the Act, we find that information in the petition and readily available in our files presents substantial scientific or commercial information indicating that listing the Oregon Cascades-California population and the Black Hills population of the black-backed woodpecker may be warranted. This finding is based on information provided in the petition, in addition to information readily available in our files, on the possible loss of black-backed woodpecker habitat due to **salvage logging, fire suppression, and forest thinning**, and on the possible negative population effects due to small population size and climate change. We will initiate a status review to determine whether listing each population as endangered or threatened under the Act is warranted.” (emphasis added)

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<sup>1</sup> <http://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?sPCODE=B0F5>

Federal agencies such as the BLM are required to take actions to prevent the need to list species such as the black-backed woodpecker. We recommend that the BLM review Bond et al. 2012 (attached) to develop conservation actions in the RMP to maintain and enhance black-backed woodpeckers in the planning area and decision area lands.

The DEIS/RMP failed to analyze alternative that would improve viability of black-backed woodpeckers by instituting conservation measures to provide large patches of intact burned forest, manage for dense forests with no thinning, curtail fuels treatment, and reduce the intensity of fire suppression efforts in appropriate potential habitat. Black-backed nesting appears restricted to BLM lands east of I-5 in the Medford and Lakeview districts but could extend west along the Siskiyou Crest.

The DEIS/RMP is defective because it fails to include quantitative landscape scale retention requirements for robust post-fire snag forests. Relying on action alternative limited prohibitions for commercial salvage in reserves may not be adequate to assure adequate habitat for black-backed woodpeckers to reproduce successfully. In addition, the RMP needs to identify active management to increase black-backed populations which are believed to be declining in the planning area. For example, prescribed fire that kills patches of young pine trees has been found to be successful to attract black-backed woodpeckers for successful reproduction. See link below:

[http://www.yakimaherald.com/news/local/burned-out-forests-helping-some-birds-thrive/article\\_d29559b4-0fed-11e5-a226-9b95973e21b6.html](http://www.yakimaherald.com/news/local/burned-out-forests-helping-some-birds-thrive/article_d29559b4-0fed-11e5-a226-9b95973e21b6.html)

Although Bond et al. 2012 was written for California, most of the recommendations are applicable to the forested planning area and decision area lands east of I-5.

The DEIS/RMP is defective because it fails to require BLM to coordinate with ODFW, FWS, Forest Service, Partners in Flight and others to conduct annual scientific monitoring of black-backed woodpecker populations in the planning area similar to protocols in Bond et al. 2012. The DEIS/RMP is defective because it lacks baseline black-backed woodpecker population data for the planning area or baseline numbers of documented successful reproduction on decision area lands.

**9. The DEIS/RMP spotted owl analysis (DEIS: 746-819) and management direction (DEIS: 938) is defective because post-harvest canopy monitoring have found that NSO habitat has been downgraded and/or removed contrary to decisions asserting to “maintain” habitat.**

Modeling assumptions that harvest will “maintain” NSO habitat have been disproven by BLM overcutting of northern spotted owl habitat. The DEIS:938 says to “maintain habitat for spotted owls”. The DEIS:938 defines what it means to “maintain habitat for spotted owls”:

“Although structural characteristics vary across the northern spotted owl’s range, northern spotted owl *nesting roosting habitat* generally is characterized by conifer

stands with a multi-layered, multispecies canopy dominated by large (> 30 inches diameter at breast height) conifer overstory trees, and an understory of shade-tolerant conifers or hardwoods, ≥ 60 percent canopy cover, substantial decadence in the form of large, live conifer trees with deformities (such as cavities, broken tops, and dwarf mistletoe infections; numerous large snags), ground cover characterized by large accumulations of logs and other woody debris, and a canopy that is open enough to allow northern spotted owls to fly within and beneath it. Northern Spotted owl *dispersal habitat* generally is characterized by conifer forest stands with an average diameter of ≥ 11 inches at breast height and ≥ 40 percent canopy cover.”

We provide data that demonstrates that BLM has overcut spotted owl habitat causing it to be downgraded or removed. We assert that modeling assumptions about harvest “maintaining habitat for spotted owls” have been shown to be false with empirical data of overcutting and that the “maintain” criteria cannot be consistently met with current timber sale marking techniques (i.e. there is no certainty for maintaining habitat). The purpose and need statement for recovering ESA listed species is not being met.

The BLM DEIS/RMP must consider new information that has found that instead of maintaining NSO and fisher habitat in recent BLM harvest units, the BLM marking and subsequent logging has actually caused NSO habitat to be downgraded and even removed. A three page letter dated August 15, 2014 from Dayne Barron (Medford BLM) to Roseburg Field Office Supervisor (FWS) states: “ the actual [harvest] actions resulted in the removal of approximately 25 acres of NRF habitat, downgrade of approximately 10 acres of NRF habitat and the removal of approximately 91 acres of dispersal habitat.” The O’Lickety and Lick Stew Project overcutting is not an isolated incident. Failure rates of field checked units are 90% failure to maintain. Unplanned northern spotted owl habitat downgrade and removal has been documented on the Medford District Butte Falls resource area with the Vine Maple timber sale (attached). The BLM post-implementation monitoring of the Bald Lick timber sale shows that nearly every unit logged was downgraded or removed (attached). The BLM post-implementation monitoring of Wagner Anderson timber sale found that 3 units checked had downgraded or removed spotted owl habitat and monitoring for 17 remaining units has not been posted. Klamath Siskiyou Wildlands post-implementation monitoring at the Deer North timber sale in the Grants Pass resource area found one unit with dispersal habitat removed (attached).

Notes from a BLM/FWS meeting dated September 19, 2014 states: “There is uncertainty whether the proposed level of timber harvest will be compatible with spotted owl recovery and meet ESA section 7 obligations.” (attached) Obviously the extent of habitat downgrading and removal is much greater in extent than presented here and all BLM NSO post-harvest habitat monitoring needs to be analyzed for DEIS/RMP. The DEIS/RMP models are wrong because of high failure rates to maintain NSO habitat as assumed. BLM models and management directs the maintenance of NSO habitat but the BLM is actually downgrading and removing habitat.

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