



United States Department of the Interior



FISH AND WILDLIFE SERVICE

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Memorandum

To: State Director, Bureau of Land Management
Oregon State Office
P.O. Box 2965
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From: State Supervisor, Oregon Fish and Wildlife Office
Portland, Oregon 

Subject: Comments on the proposed mineral withdrawal by the Bureau of Land Management and United States Forest Service in southwestern Oregon (FWS TAILS #: 01EOFW00-2015-CPA-0060).

The U.S. Fish and Wildlife Service (Service) appreciates this opportunity to provide comments regarding the Bureau of Land Management (BLM) and the U.S. Forest Service's (USFS) proposed mineral withdrawal within the Klamath-Siskiyou bioregion of southwestern Oregon. The Service commends the agencies for initiating this process and provide our support for the proposal to withdraw approximately 5,216 acres of BLM-managed public domain lands and 95,000 plus acres of National Forest System lands, for 5 years, while Congress considers legislation to permanently withdraw those areas. The mineral withdrawal is needed because the Service believes that mining activities are incompatible with the high resource values of this bioregion and do not align with the conservation of Federal trust species which the Service is entrusted to protect and conserve. Our comments are provided under the auspices of technical assistance from the Service to the land management agencies under the authority of the Endangered Species Act (ESA) (16 U.S.C 1531 et seq.) and other resource protection statutes.

The Klamath-Siskiyou (K-S) bioregion has long been recognized as an important ecoregion not only nationally but globally as well (see World Wildlife Fund and International Union for the Conservation of Nature). The K-S bioregion is an expression of its biological diversity and unique evolutionary history. Because of these unique factors, it hosts some of the most productive salmon and steelhead fisheries outside of Alaska; is home to the largest concentration of Wild and Scenic Rivers in the nation; has some of the largest-contiguous acreage of forest on the West Coast; and, provides habitat for 3,500 plant species of which 280 are rare or endemic.

Salmonid strongholds, including ESA listed Coho salmon, and nationally significant Wild and Scenic Rivers, occur with the mineral withdrawal area. Pacific lamprey, a Service Species of Concern, also occurs throughout the proposed withdrawal area. Major threats to lamprey include poor water quality, dredging, and stream and floodplain degradation, all of which are consequences of inappropriate mining methods. The Service, along with other federal agencies, has spent considerable time and resources in developing and implementing best management practices for lamprey because the immediate need for lamprey conservation is evident. Withdrawing this area from mining will provide needed long-term habitat conservation benefits to lamprey and native freshwater resident fishes while simultaneously benefiting anadromous salmonid species.

The forested landscape of the K-S bioregion also provides a stronghold for rare forest carnivores such as the Pacific fisher and Humboldt marten. Federally listed avian species such as the northern spotted owl and marbled murrelet and their designated critical habitats occur here as well. The removal of forest habitat, which is an outcome of strip and hardrock mining, would contribute threats to carnivores and avian species, as well as other native terrestrial and aquatic species. Withdrawing this area from mining will alleviate habitat-loss threats and contribute to the possibility of not listing candidate species because of intact habitat remaining on the landscape.

The K-S bioregion is well-known for its vast array of unusual and endemic flowering plants. This is exemplified by BLM and USFS having established thousands of acres of Areas of Critical Environmental Concern and designated botanical areas, particularly in Rough and Ready Creek, due to rare and endemic plants. Several of the rare plant species include ESA protected Gentner's fritillary and Cook's desert parsley, which occur in the proposed withdrawal area. Protection of the withdrawal area will further conservation of the listed plants by providing broad distribution and sources of connectivity for these small and isolated plant populations.

Straddling the Oregon-California border, the K-S bioregion contains some of the largest concentration of intact watersheds on the west coast and world renowned biodiversity. These exceptionally high resource values, including several federal candidate and listed species, makes mining incompatible with the resource values and conservation investments in the bioregion. For these reasons, I urge the land management agencies to follow through on the proposed mineral withdrawal of the approximately 100,000 acres of federal lands in the K-S bioregion.

Thank you for this opportunity to provide comment. Please feel free to contact me at (503) 231-6179 if you would like to discuss these comments further.