

***(Comments sent to BLM anonymously from retired agency employee)***

**We have reviewed the Area 51 EA and have the following comments relative to Fisheries:**

The EA (page 34), states that the “NMFS concurs that the proposed Victoria Drive-Grass Valley Creek Land Exchange Program is not likely to adversely affect listed salmonids, proposed threatened sturgeon, proposed or designated critical habitat or Essential Fish Habitat (EFH) for pacific salmon. Therefore, BLM has made a determination that the proposed action would have an insignificant effect and is ‘not likely to adversely affect’ California Central Valley steelhead or Central Valley fall-run chinook and their associated habitats.” This indicates that NMFS evaluated the “exchange program” rather than its “impact”, subdivision development. It also appears that the determination of insignificant effects are not those of the fishery agencies, but those of a land management agency.

We recommend that BLM and all of the fishery agencies re-evaluate the likely impact of subdivision and subsequent home-site development, not only within Area 51, as was done in the EA, but particularly in the downstream areas where most of the impacts (including cumulative and critical habitat impacts) are most likely to be greatest - see the following paragraphs. This downstream area contains the stream’s most important spawning and rearing habitat for salmonids including salmon, steelhead and resident trout. Impacts could also extend into the Sacramento River and should be evaluated.

The potential impact of subdivision activity on fish and other aquatic life is well illustrated in Middle Creek, the adjacent drainage to the west of Salt Creek. Subdivision activity and other soil disturbances such as power transmission line right of way activity caused massive siltation of the Middle Creek streambed with some deposits of three feet over the downstream salmonid spawning and rearing areas plus possible adverse impacts on the Sacramento River. The impacts on fishery resources occurred miles below the subdivisions and essentially eliminated successful salmonid spawning and recruitment in Middle Creek. It took substantial interventions and a number of years of flushing winter flows before fish habitat was restored. BLM lands and rehabilitation efforts on BLM lands were involved. These impacts occurred even though there was little or no subdivision encroachment into the stream corridor. However, the Area 51 EA (page 33) proposed a stream corridor setback covenant as mitigation that would result in “...no net change to the pre-exchange environmental conditions of the creek corridor.”

We believe the siltation lessons from Middle Creek should be applied to the Salt Creek drainage and the Area 51 EA with emphasis on downstream impacts. We recommend the EA re-evaluate the cumulative impact of the substantial current and planned subdivision activity throughout the Salt Creek drainage along with that within Area 51. Note that much of the existing and proposed subdivision development activity above Area 51 is on steeper slopes where even greater soil erosion risk is likely; the major power transmission line that contributed to siltation in Middle Creek also crosses the upper Salt Creek drainage. Since the County, State and Federal laws and regulations appear to be little changed from the time of the Middle Creek siltation problems (with the exceptions of [1] final critical habitat designation and protective regulations for steelhead issued in 2005 [see enclosure] and [2] new Federal Section 402 regulations that require storm water prevention plans, plans that apparently have not yet been developed or implemented by Shasta County), it appears that the EA analysis does not realistically evaluate

potential streambed siltation impacts. Substantial impacts can be expected, not only from Area 51 subdivision activity, but also from the development of individual parcels within the subdivision; Shasta County does not require grading permits with protective erosion control measures for subsequent individual home construction. The EA statements (page 33) that other agency regulations will "...ensure the appropriate environmental conservation for future development action" and that "... this land exchange would result in a no net change to pre-exchange environmental conditions of the creek corridor." should be re-evaluated both by the fishery agencies and in the EA. The potential impacts in the Sacramento River should also be considered.

The EA tends to minimize the importance of Salt Creek fishery resources. However, those resources appear to be self sustaining, and along with other small tributaries to the upper Sacramento River, certainly contribute substantially to the total resource. Potential impacts to other aquatic resources such as amphibians and invertebrates should also be considered.

**(ENCLOSURE:)**

<http://www.nwr.noaa.gov/ESA-Salmon-Listings/Salmon-Populations/Steelhead/STCCV.cfm>

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**CALIFORNIA CENTRAL VALLEY STEELHEAD DPS**  
***THREATENED***

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**DPS STATUS AND DESCRIPTION:** Listed as a threatened species on [March 19, 1998](#); threatened status reaffirmed on [January 5, 2006](#). The DPS includes all naturally spawned anadromous *O. mykiss* (steelhead) populations below natural and manmade impassable barriers in the Sacramento and San Joaquin Rivers and their tributaries, excluding steelhead from San Francisco and San Pablo Bays and their tributaries, as well as two artificial propagation programs: the Coleman NFH, and Feather River Hatchery steelhead hatchery programs.

**CRITICAL HABITAT STATUS:** A final designation was published on [September 2, 2005 \(6.2 Mb PDF\)](#), with an effective date of January 2, 2006.

**PROTECTIVE REGULATIONS:** Final revised protective regulations were issued for this DPS on [June 28, 2005](#).

**STATUS REVIEWS & UPDATES:** [Click here to view a list.](#)

**FEDERAL REGISTER NOTICES:** [Click here to view a list.](#)

**MAPS & GIS DATA:** [Click here to view.](#)

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