

Coos Bay District BLM  
Kathy Hoffine  
Myrtlewood Field Manager

## **RE: More Scoping on the Wagon Road Pilot Project**

Dear Kathy

In response to information I received in last week's field trip, I have a few more scoping comments I would like you to consider in the development of the EA.

### **Retention**

The aggregate blocks for this pilot are much smaller than they are on Roseburg BLM pilot project. If both projects are meeting the same goal in "wet forests", one retention blocks is appropriate, and the other is not".

It appears the aggregate retention for the Wagon Road pilot does not meet the purpose of retention, as described my Drs. Johnson and Franklin:

"The general prescription proposed in the Coos Bay Pilot Project is retention of 20 to 30% of the pre-harvest forest. The majority of the retention will be in the form of small (e.g., ½ to 3-acre) intact patches ("aggregates") that are not entered during the harvesting operation.<sup>1</sup>

There are 10 aggregate blocks now marked out in the unit, totaling 5.22 acres (see field trip handouts). That would average about ½ acre per block. However, the recommendation from Franklin and Johnson is for ½ acre to be the absolute smallest, and have aggregates up to 3 acres. The current aggregates do not meet that standard.

Franklin and Johnson also determined that aggregates should also be 20 to 30 percent of the regen unit, which is 120.5 acres. However, 5.2 acres of retention is only 4%, far lower than the lowest recommended. If Franklin and Johnson's low point, 20%, is implemented, the aggregates should be 24 acres, not 5 acres.

The EA should describe each of the 10 aggregates, what legacy components each one is protecting, and explain why the BLM is deviating from the specific guidelines for size.

At the field trip, it was discussed that single old growth trees would be left scattered around the unit. Jerry Franklin explained how it is good for them to be clearcut around, and gave a Ponderosa Pine example, implying it applied to the Douglas fir old growth

---

<sup>1</sup> A Guide to Creating Diverse Early Successional Ecosystems through Variable Retention Regeneration Harvest on the Coos Bay District of the BLM. June 1, 2011. Jerry Franklin and Norm Johnson.

trees. This was confusing. One of the students asked a question implying that science found Douglas fir old growth trees were enhanced by clearcutting around them. The EA should clear this up. If there is science that finds it is good for Douglas fir old growth trees to stand alone in a clearcut, the EA should refer to that science. If not, the EA should discuss how it could imperil these individual trees to stand alone in a clearcut, include soil compaction, wind throw, logging damage, yarding damage, etc.

The contract for the logging of this project should impose financial penalties if the retained old growth trees are damaged by felling, yarding, or burning.

### **Dead trees**

The Franklin/Johnson June 30 paper on the Coos Bay Pilot brings up the importance of snag creation using fire, or mechanical means.

“Additional retention will occur as individual trees and snags and small clusters of trees. Retention of some of the individual trees will be to provide candidates for snag creation either using fire (broadcast slash burning) or mechanical means”<sup>2</sup>.

The EA should fully describe how this early seral component, snags, will be provided for, and which, if any, of the aggregates will be burned. The Roseburg BLM Pilot project is proposing to create groups of snags with fire. The Forest Service often does this also. The main purpose of the Coos Bay BLM project is to create early seral features; the most important one missing from the landscape is snags.

If fire, the most natural and best method for creating snags will not be used, the EA should compare the different environmental impacts of using another method. Snag creation could be described differently in different alternatives.

### **Reforestation**

Our first scoping comments expressed alarm at planting 200 trees per acre. This was a change from Franklin and Johnson’s original proposal of no replanting, with regeneration depending on the hundreds of trees per acre that will regenerate from scattered and aggregate retention. Planting 200 trees per acre on top of the regeneration from retention trees could produce 6 or 7 hundred trees per acre – just another fiber farm with nothing “pilot” about producing early-seral habitat.

On the field trip, the BLM defended the 200 TPA by claiming that if regeneration is too heavy, the BLM (or the Tribe) will go out with loppers and cut down some regeneration.

The EA should fully describe this proposal, setting standards that can be monitored and measured. How many trees per acre will need to occur before the loppers are used? What level of stocking will the loppers reduce it to? Who will do this work and how will it be paid for?

---

<sup>2</sup> A Guide to Creating Diverse Early Successional Ecosystems through Variable Retention Regeneration Harvest on the Coos Bay District of the BLM. June 1, 2011. Jerry Franklin and Norm Johnson.

Since the #1 purpose of this project is to produce early-seral habitat, the tree-stocking proposals are one of the most important components that should be fully described and monitored.

### **Violations of the OFPA**

This project will create a regeneration opening of 120.58 acres<sup>3</sup>. The Oregon Forest Practices Act limits openings to 120 acres, tops. This project will exceed that limit. Over 14 acres of thinning will also occur next to the 120 acre regeneration harvest, making the opening even bigger because of those edges and the new roads. While the BLM does not have to comply with state regulations, it is rude not to do so, especially since the BLM can consider alternatives that do comply with state rules.

### **Roads**

We found out on the field trip that a lot of new road building is being proposed for this project, 1.1 miles. Please consider our previous comments, June 30, page 14, where we ask that the EA disclose how many acres each road segment is intended to access, so you can consider which roads to eliminate. For instance, Spur 2 and 3 look questionable. How many acres will they access that the main road cannot access? Not many. An alternative should consider that this project could significantly reduce new road miles, and lose only a few acres of logging, by eliminating spur 2. An alternative should consider if the environmental trade-off could be worth it.

It appears that spur 3 ends at an aggregate block. If this, or any other aggregate block needs to be yarded through, the EA should disclose this, and consider the damaging impacts of yarding through what is supposed to be a retention area.

On the field trip, I was disappointed to hear that these new roads will all have permanent roadbeds where compaction will not be addressed and vegetation will not be replanted. They will only be blocked or gated. The EA should assure us that ATVs would not breach those closures and that this will be monitored and barriers fixed if they are breached.

The EA should explain why compaction will not be addressed or vegetation replanted. In the Roseburg BLM pilot, new roads will be fully decommissioned by pulling up the compaction and by replanting vegetation in the road bed. ATVs will be discouraged by pulling slash over the road. The Coos Bay Pilot should consider an alternative that does the same.

At the field trip the BLM implied that replanting road beds is not needed because the roads would vegetate themselves naturally and quickly. This information should be documented in the EA. If the BLM is depending on this natural type of road restoration, the EA should disclose the assumptions behind this restoration. The EA should describe how long natural revegetation will take and the species expected to restore the road.

---

<sup>3</sup> Summary sheet handed out at the field trip.

If the BLM doesn't really want the roads to become revegetated, the EA should tell us why. Is it to have access to suppress fires? The fire return interval of the coast range means it would not be for natural fire, but human-caused fire. Human caused fires do start more frequently on roads. So if fire is an issue, the road should be fully decommissioned.

### **Spur 9**

This spur appears to be one of the longest new roads, to be built for the purpose of Marbled Murrelet enhancement in the "Marbled Murrelet Density Management Area". Logging to enhance murrelet habitat is not in keeping with the purpose of the project, to enhance early-seral habitat. Therefore, Spur 9 must not be built if it cuts down platform trees, or potential platform trees, or large trees.

The center line for this road is flagged in. The BLM knows, in time for the writing of the EA, if the road will take out larger trees – trees larger than what the thinning prescription would take out. The EA is the place to disclose this information to help decide if this road really enhances murrelet habitat, or if it could actually degrade it by taking out large trees.

### **Marbled Murrelet Density Management.**

This part of the unit should be dropped. It doesn't fit in with the purpose and need for the project. If it is not dropped, the EA should be clear that the thinning will not add any edge effects to the Marbled Murrelet habitat it adjoins.

It is our believe that thinning could easily add edge impacts to many acres of the adjoining murrelet habitat by creating larger spacing between trees, allowing predication by corvids to occur within the murrelet habitat. If the BLM can point to studies that opening up the forest next to murrelet habitat does NOT cause edge effects, these studies must be sited in the EA. Otherwise, drop this part of the project, especially since it needs a long and damaging new road with a planned permanent road bed, perfect for corvid travel deep into the forest.

### **Staff Qualifications**

The amended cooperative agreement between the Tribe and BLM is posted on BLM's web site. It says that the Tribe will be paid \$116,500 for "technical expertise and support" to the BLM's ID Team, including wildlife surveys, BA preparation and scientific oversight for the Pilot Project.

I asked the BLM for the Tribe's wildlife survey and scientific oversight qualifications. The BLM responded "we do not have qualifications on file."<sup>4</sup> We are surprised that the BLM is paying \$116,000 for "Technical Expertise", without knowing the qualifications of the people doing the work. The BLM should straighten out this oversight. NEPA requires this information to be disclosed in the EA (1502.17).

---

<sup>4</sup> Email from Kathy Hoffine, 9-19-11

**Maps**

Please provide us with .kmz files for this project. You easily have the ability to create these google maps files, and you should, so the public can have some of the mapping information that you have. The Roseburg BLM is providing us with .kmz files for their pilot project. The Forest Service always provides us with .kmz files for their projects. The Coos Bay BLM should also, and if not, explain to us why not.

Thank you for your response.

Francis Eatherington  
Cascadia Wildlands  
P.O. Box 10455  
Eugene Oregon, 97440

541-643-1309    francis@cascwild.org