



07/27/2011 11:15 AM

To skellehe@blm.gov

cc [REDACTED]

bcc

Subject Pilot Joe EA Comments

History:

✉ This message has been replied to.

July 26, 2011

Bureau of Land Management

Medford District Office

3040 Biddle Road

Medford, Oregon 97504

RE: Comments to Pilot Joe Environmental Assessment

Thank you for the opportunity to comment on the Pilot Joe EA.

Ref. 2.2.4, **Applicable Harvest and Logging Project Design Features (PDFs) (p.2-13)**

This pilot project presents the opportunity for BLM to assess the viability of innovative small-scale harvest methods, particularly in the non-commercial units of 31-11, 31-14, 1-4, 35-3 and 35-4. Contracting the work to small (1-4 people) businesses with light impact equipment (e.g., utility terrain vehicles) gives the BLM an ideal situation in which to evaluate the efficacy of conducting projects with small crews. Utilization of such independent contractors would increase potential local employment while giving BLM an option for future projects. BLM projects and forest management would benefit from using the “smaller tools” of independent contractors.

Ref. 2.2.4, **Protection of Botanical Resources Project Design Features**

Special status Plant Species

While common names for plants are used later in the EA, it would be useful to the public if common names were used throughout.

Ref. 5.0 Monitoring Plan

While public input is mentioned in the last paragraph of this section, it should be featured more predominately and throughout the discussion. Public participation thus far has been exceptionally vibrant for a BLM project and unaffiliated members of the public, like myself, will continue to monitor the project and work with BLM on outcomes. It would be useful to include plans for public monitoring along the same lines as the familiarization field trips that began the project.

That said, this EA is very well done and provides an excellent basis for reviewing project impacts and results.

Burning: The State Forester recommends “Minimize emissions from prescribed burning.” Applegate Valley residents regularly complain of the impacts from BLM burn piles and broadcast (i.e., prescribed) burning. Though this EA does mention alternatives, the emphasis still appears to be a default decision to pile and burn and to use understory burning after treatment. Alternative methods, such as goat forage, hand work, and mechanical mowing should be considered. While burning is a useful tool for land and forestry management, known consequences should lower its priority in considering various treatment approaches.

Roads: This EA reflects very well the input received from the public during field trips and Scoping relative to roads.

Off-Road Vehicle (ORV) Recreation: Tours of the Pilot Joe project area show, as the EA states, that “The majority of OHV use in the Pilot Joe area tends to be in the upper reaches of the watershed, far from the private lands.” BLM has spent almost ten years trying to implement an inadequately designated ORV area around Timber Mountain/John’s Peak that has met with significant public opposition because it is on land interspersed with and surrounded by numerous private, residential lands. The Pilot Joe area, as described, appears to present a viable alternative to the inappropriate Timber Mountain/John’s Peak area. The fact that the Pilot Joe area contains

steep terrain that would limit ORV recreation makes it an ideal area for constraining such recreation to designated routes. This alternative should be further explored.

Again, thank you for the opportunity to comment on this EA. I look forward to further cooperation with BLM on this project.

Sincerely,

