

Kelleher, Stephanie

From:
Sent: Monday, May 07, 2012 10:16 PM
To: Kelleher, Stephanie
Subject: BLM Pilot Thompson Scoping Comment

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Medford District Office
Bureau of Land Management
3040 Biddle Road
Medford, Oregon 97540

Re: Pilot Thompson Scoping Comments

May 6, 2012

It is my objective, as an Applegate Valley resident, to provide comments particular to the Applegate community and it's environs, regarding Phase Two of the Middle Applegate Pilot: Pilot Thompson. This is a comment for the scoping process. The Pilot Projects have been touted as inclusive of community concerns and issues, and it is my hope, that my particular concerns will be taken into account. If you are to continue saying that the Pilot projects are, indeed, "collaborative" and inclusive of community input, then you better show that to be true, by modifying the project to answer the public's concerns and implement their ideas. So far the public seems to have been steamrolled, and the BLM continues to plan the project to suit its own needs, rather than the needs of the community.

You would think that the Middle Applegate Pilot, being implemented within the Applegate Valley, would benefit the Applegate community itself, but that hasn't been shown to be the case. In fact, the contractor and workers who implemented the Pilot Joe project, Hanscom Logging, are from the Rogue Valley, not the Applegate Valley, so jobs created for Applegate residents were negligible. If this continues to be the case with Pilot Thompson, then you will need to stop describing the Pilots as beneficial to the local economy. It is my understanding that even the Secretary of the Interior himself, Ken Salazar, stated that only 12 new jobs were created during the logging of Pilot Joe. My opinion is that you need to break the project into smaller sections, so that local crews can actually bid on and implement part of the project. Don't exclude the locals from being able to take part in the process.

At issue here too, is the fact that you are stressing the commercial logging at an extreme, over the fuel reduction, service contract, non-commercial work that is crucial to this truly being "ecological forestry." You have yet to complete any of the fuel reduction and slash removal on the Pilot Joe project, and that doesn't bode well for Pilot Thompson. You don't even have money for fuel reduction or slash cleanup for Pilot Thompson, so how can this be good for fire safety. It is absolutely crucial that money for fuels work be included in the project, and funding secure, before moving on. You can't have a logging show, no matter how light, and not deal with the slash, and then call it fuel reduction or ecological forestry. It then just becomes an increased fuel nightmare. As an Applegate resident concerned with fire resiliency in our forests, I believe that the fuel reduction is more important than the commercial logging.

I feel that the BLM has done a poor job in the community collaboration process. It has been extremely hard for people who have full time, 40 hrs./wk work to attend the meetings or tours of the Pilot. The BLM needs to have

options outside normal work hours for community involvement. I personally have not been able to make it to any of the scheduled events because of my work schedule. For this reason, I have yet to see the units from within, but I have gone close enough to be able to see what has been done from afar. It is glaringly obvious, when you look at the Pilot Joe project from Highway 238, that the yarding corridors are mini clearcuts. This winter, when there was snow on the project area, I could see the yarding corridors delineated so clearly, I could tell that it has had a negative impact on the ecosystem. Forestry work that bills itself as "ecological" cannot include any kind of clearcutting, no matter how small of an area. The straight, linear lines of the yarding corridors look horrible and unnatural, because they are unnatural. This is not ecological forestry, it is industrial forestry!; the normal, run of the mill logging show. The straight lines of the yarding corridors make it impossible for you to create the heterogeneity prescribed for the Pilot by Norm Johnson and Jerry Franklin. These yarding corridors, as you are creating them, will impact soils through compaction, increase noxious weed spread, and increase erosion rates, which could ultimately affect salmon habitat. What kind of residual damage are you getting on leave trees on the edges of the yarding corridors? In order to truly implement an ecological approach, low impact, innovative yarding systems should be utilized in this project.

This leads to another major concern, monitoring, or lack there of. There is minimal monitoring going on with Pilot Joe, and without even preliminary monitoring results the BLM is pushing full steam ahead with Pilot Thompson. How do you know that the benefits from the Pilots are successful enough to keep implementing the same prescription? What if there are mistakes that could be shown from better monitoring, and you don't know it, but you keep going on with new Pilot Projects, only to repeat the same bad mistakes? These bad mistakes can have negative, landscape wide ecological impacts. It is unwise to keep progressing until you have better data from initial Pilot Projects. They are, after all, Pilots, meant to be initial projects that serve as examples for future land management. What a shame it would be if we were to look back at these Pilots in the future as full of ecological mistakes. Modification of the Middle Applegate Pilot Project should be happening as you go along, to account for ecological concerns that you encounter along the way. Full funding of monitoring can make this happen.

NO NEW ROADS should be constructed as part of the Pilot Thompson Project. This is the most controversial within the Applegate community, and will increase road density in an area already overly dense with BLM roads. The ecological and social impacts of new road building are far too great for you to even suggest it. You will continue to have community backlash if you construct new roads. If you want the Pilots to truly be considered collaborative, then you need to listen to the community and not build new roads. The backlog of road maintenance on the BLM road system is already too great to handle even more road construction. The BLM already has a hard time keeping up with road maintenance, and should not exacerbate the issue by building more roads. New roads would also need future maintenance, without which there would be more failing, washed out, and blown out roads, and the resulting impacts to aquatic and salmonid habitat.

Off-road vehicle issues would be increased in the project area if new roads are constructed. New roads are vectors for OHV use, which is already a major problem in the Applegate Valley as a whole. Ferris Gulch, within the project area, in particular, has a bad OHV problem. OHV use increases the chances for noxious weed spread, soil erosion, wildlife disturbance, noise disturbance, soil compaction, and increases the chances for wildfire ignition. Please refrain from building new roads in the Pilot Thompson Project.

Road decommissioning is greatly encouraged. Roads can easily be turned into useful hiking trails for public enjoyment. Decommissioning roads will save the BLM money by reducing the backlog of road maintenance. Road decommissioning will also be good for aquatic life due to less erosion from failing road systems.

I support protecting large trees and roadless areas, as well as the non-commercial thinning of overly dense forest stands.

Protecting sensitive wildlife species is crucial to meeting the ecological principals guiding the Pilot Projects.

The LSEAs within the Pilot Thompson area are good for wildlife species. Please make them large enough for Northern Spotted Owl nesting, roosting, and foraging, and to prevent owl "takes." The Siskiyou Salamander is a candidate for Endangered Species listing and is found within the Pilot Thompson area as well. The LSEAs must also be large enough to protect this vulnerable species. Please fully implement the Survey and Manage program for both flora and fauna. Better monitoring of wildlife species in general, both before and after project implementation, is encouraged. How is the wildlife responding to the Middle Applegate Pilot Projects so far? How did they respond to Pilot Joe? Wouldn't it be good to know before moving on with Pilot Thompson?

There are many things about the Pilot Projects that are good. However, I do not think that you should be planning operations in Riparian Preserves. Riparian Preserves are sensitive areas, that if opened up could lead to many ecological issues in the future. It is best to leave Riparian Preserves alone until it is shown that the Pilot Projects are indeed, truly ecological, which has yet to be shown. Aquatic conservation is an important issue and would be best addressed by leaving the Riparian Preserves alone.

This project has the potential to do a lot of good in the form of forest health thinning, but also the potential for negative ecological impacts from industrial style logging. Please focus on the ecology more than the economics of the project. We want healthy, resilient forests.

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