

Dispensation of Key Issues in Pilot Thompson

Issue--**Roads**

- Increasing road density and their cumulative effects
- Road construction in riparian zones
- New roads will add to maintenance backlog

Proposals

- Alternative 2: No roads or landings in riparian reserves (EA, p. 3-69); 0.37 miles new permanent roads, 0.25 temp road, and 2.55 mi decommissioned road (EA, 2-9).
- Alternative 3: No new permanent or temporary roads; 2.55 mi decommissioned road (EA, 2-20).

Applicable Guidance--RMP Standards/Guidelines Related to Roads (pp.87-88).

- *Follow best management practices for water quality and soil productivity to mitigate adverse effects on soils, water quality, fish and riparian habitat during road construction and maintenance.*
- *Reduce road density by closing minor collector and local roads in areas or watersheds where water quality degradation, big game harassment, or other road related resource problems have been identified.*
- *Manage and design road systems to reduce public health and safety hazards, fire risks, vandalism to public and private property.*

Implementation—How Addressed?

1. Collaborative team explored opportunities for road management
 - a. Resulted in 7 miles of road recommended for decommissioning, 2.55 miles which are tenable under the timber sale.
 - b. Acknowledgement that some new construction could be needed to access stands currently without access.
2. The effects of building new roads vs. no new roads explored in two alternatives.
3. Best Management Practices are identified in the list of project design features in the EA (p. 2-31 to 2-43).
4. Cumulative effects analysis data on existing roads from field and aerial photos--130 miles of roads in the 23,268 acres analysis area, including 17 miles of paved roads and 61 miles on private land (p. 3-38).

Issue--OHV

- New roads, skid trails and yarding corridors can increase unauthorized OHV trails.

Proposals

- Alternative 2 (EA, p. 2-2):
 - 0.37 miles new permanent roads, 0.25 temp road, and 2.55 mi decommissioned road (EA, 2-9).
 - 165 acres of tractor yarding
 - 1,061 acres of cable yarding
- Alternative 3 (EA, p. 2-13):
 - No new permanent or temporary roads; 2.55 mi decommissioned
 - 166 acres of tractor yarding
 - 990 acres of cable yarding

Applicable Guidance--RMP Standards/Guidelines Related to OHV (pp.66-67).

- *Ferris Gulch (2,200 acres) will be managed to provide for OHV use.*
 - *Off-Highway vehicles are limited to existing roads and designated trails.*
- *The remaining portion of the analysis area will be considered open to OHV unless specifically limited or closed with a special designation.*
- *The Nine-mile creek area has a designated emergency closure to OHV (Not in RMP, but through Code of Federal Regulation (CFR) authorities).*

Implementation—How Addressed?

1. The effects of increasing unauthorized OHV as a result of new road construction is considered in two alternatives that explored new roads vs. no new roads.
2. Project Design Features to minimize the effects of unauthorized OHV are:
 - a. All new roads will be closed after the timber sale (EA, p. 2-36).
 - b. Temporary roads to be fully decommissioned or obliterated (EA, p. 2-36).
 - c. Skid trails at haul road intersections to be camouflaged with debris (EA, p. 2-33).
 - d. In noncommercial treatments, avoid use of old skid roads. If used, cover with debris afterwards (EA, p. 2-34).
 - e. Containment lines for prescribed burns to be blocked along entire length (EA, p. 2-35).
 - f. Barriers and debris to be used on decommissioned roads (EA, p. 2-37).

Issue—**Riparian Reserve Thinning**

- Logging in riparian reserves is at odds with the intent of the reserves for wildlife refugia and connectivity corridors, and protection of water quality.

Proposals

- Alternative 2 (EA, p. 2-2)
 - 83 acres of treatment; sale of commercial size (>8 inches dbh) trees
- Alternative 3 (EA, p. 2-13)
 - 84 acres of treatment; sale of commercial trees less than 14 inches dbh (i.e. 8-14 inches dbh).

Applicable Guidance--RMP Standards/Guidelines Related to Riparian Reserves (p. 27).

- *Apply silvicultural practices for riparian reserves to control stocking, reestablish and manage stands and acquire vegetation characteristics needed to attain Aquatic Conservation Strategy and riparian reserve objectives (Appendix E).*
- *Riparian reserve acres are not included in calculations of the allowable sale quantity.*

Implementation—How Addressed?

1. RR thinning includes (EA, p. 2-26):
 - a. Limited to non-perennial streams (i.e. dry draws).
 - b. Gaps will not be prescribed in RR.
 - c. No treatment in first 50 feet.
 - d. Detailed prescription in Appendix A of the EA.
2. The effect of removing larger diameter trees on wildlife is explored in one of the alternatives.
3. Project Design Features to minimize the effects of thinning in non-perennial riparian reserves:
 - a. No ground based equipment in the reserves with one noted exception (EA, p. 2-33).
 - b. Full suspension of logs across stream channels (EA, p. 2-33).
 - c. Trees are directionally felled away from the streamcourse and end-lined from outside the riparian reserve (EA, p. 2-34).
 - d. Logging slash piled outside the 50 feet no-cut buffer (EA, p. 2-34).

Issue—**Forest Health**

- Harvesting large trees may reduce forest resiliency.
- Harvesting in naturally occurring clumps may reduce biodiversity.
- Too heavy a harvest may result in solar stress that leads to mortality.

Proposals

- Alternative 2 (EA, p. 2-2)
 - 1143 acres of commercial (timber sale) treatments; plus 83 acres in riparian reserves
- Alternative 3 (EA, p. 2-13)
 - 1509 acres of commercial (timber sale) treatments; plus 84 acres in riparian reserves removing commercial trees less than 14 inches dbh (i.e. 8-14 inches dbh).

Applicable Guidance--RMP Standards/Guidelines Related to Applegate Adaptive Management Area (pp.36-38), and Timber Resources (pp. 72-75).

- *One goal of the Forest Plan is to maintain late-successional and old-growth species habitat and ecosystems. A second goal is to maintain biological diversity. All land use allocations described in this Plan contribute to these two goals. The general forest management area will be managed to retain late-successional forest legacies (e.g. coarse woody debris, green trees, snags and late-successional forest patches). (RMP, p. 21)*
- *Seek innovative approaches to achieve technical and social objectives (p. 36).*
- *Lands available for timber harvest include Adaptive Management Areas (p. 72).*
- *Apply silvicultural systems that are planned to produce over time, forests that have desired species composition, structural characteristics, and distribution of seral or age classes (see Appendix E) (p. 72).*

Implementation—How Addressed?

1. Demonstrate the restoration principles of Norm Johnson and Jerry Franklin.
 - a. Franklin and Johnson define “restoration” broadly to encompass activities that are designed to restore forests and landscapes to conditions that are both more resistant and resilient to disturbances and that provide the diversity needed to restore and maintain native biodiversity and essential ecosystem functions (p. 1-1).
2. Overall stand treatment objectives include (p. 2-23):
 - a. Conserve and improve survivability of trees 150+.
 - b. Increase stand resiliency by reducing stand densities, fuel ladders, and shifting species diversity (less Douglas-fir).

- c. Restore more suitable structure and composition; develop more heterogeneity.
 - d. Create favorable conditions for the initiation, creation, and retention of snags, down wood, large vigorous hardwoods, and understory vegetation diversity in areas where these are lacking.
- 2. Marking guideline (Appendix A) written to pay additional attention to trees over 30 inches diameter as a higher likelihood of being over 150 years old, and references a guide to help in determining old growth characteristics.

Issue—**Fire Hazard**

- Removal of trees over about 10 inches diameter may be unnecessary in order to effectively reduce the potential for high-intensity fire.
- The probability of a thinned area encountering a high severity fire patch during its 20-year effectiveness period is about 3%; therefore, thinning may not effectively prevent the effects of wildfire may not effectively prevent the effects of wildfire.
- Without follow-up treatment, natural plant response and post-harvest slash will increase the fire risk due to elevated fuels levels.

Proposals

- Alternative 2 (EA, p. 2-2)
 - ~~2216~~ 2,356 acres of vegetation treatment, of which 2,216 acres is proposed for non-commercial treatment
- Alternative 3 (EA, p. 2-13)
 - ~~2322~~ 2,723 acres of vegetation treatment, of which 2,322 acres is proposed for non-commercial treatment.

Applicable Guidance--RMP Standards/Guidelines Related to Fuels Management (p. 91).

- *Modify fuel profiles in order to lower the potential of fire ignition and rate of spread.*
- *Protect and support land use allocation objectives by lowering the risk of high intensity, stand-replacing wildfires.*
- *Reduce both natural and activity based fuel hazards through methods such as prescribed burning, mechanical or manual manipulation of forest vegetation and debris, and combinations of these methods.*

Implementation—How Addressed?

1. Slash from timber sales will be piled and burned (p. 2-31).
2. Prescribed burning would occur as needed based on post-treatment evaluations (p. 2-31).
3. The efficacy of thinning trees larger than 10 inches and the general effectiveness of thinning is discussed in the EA (p. 3-25-27).

Issue—**Wildlife/Plant Habitats**

- Project activities could reduce the complexity of forest structure, snags, and downed wood which provide important wildlife habitat.
- Degrading habitat for threatened, endangered, sensitive, or survey and manage species may result in further population declines and/or trends away from the recovery of the species.
- Habitat alteration including reduced canopy cover and soil compaction associated with harvest activities degrades habitat for native plant populations.

Proposals

- 17 suspected or known special status wildlife species (3-95); 8 vascular and non-vascular Special Status and Survey and Manage plant species (3-124); 14 species of sensitive fungi (3-126).

Applicable Guidance--RMP Standards/Guidelines Related to Special Status Species Plants and Animals (p. 47-52).

- *Review all proposed actions to determine whether or not special status species occupy or use the area (p. 51).*
- *Consult/conference with USFWS or NMFS for any action that may affect Federally listed or proposed species or the critical or essential habitat (p. 52).*
- *Implement the survey and manage provisions (p. 53).*
- *Leave a minimum of 120 linear feet of logs per acre, protect it to the greatest extent possible during burning, and allow for deferred application of standards in partial cutting (p. 46).*
- *Provide a renewable supply of large live trees and snags well distributed across the Matrix lands (p 47).*

Implementation—How Addressed?

1. Late Successional Emphasis Areas were designated to protect large blocks of habitat for threatened, endangered, sensitive and survey and manage species (p. 1-6).
2. Project Design Features include provisions for identifying and protecting nest sites and occupied habitats, and reducing disturbance (2-39 to 2-42).
3. Consultation is occurring with FWS on effects to owls and their critical habitat.
4. Alternative 2 downgrades (not removes) 57 acres of nesting, roosting, foraging NSO habitat (3-109); Alternative 2 neither downgrades nor removes **critical** habitat (**CHU**) (3-113).
5. **Alternative 3 downgrades (not removes) 214 acres of nesting, roosting, foraging NSO habitat (p.3-119); Alternative 3 neither downgrades nor removes critical habitat (CHU) (p.3-120).**
6. “No Effects” determination for fish; therefore, there is no consultation with NMFS (3-89).
7. Snags not considered a safety hazard will remain standing (2-38).
8. Coarse woody debris to be protected from damage in noncommercial units (2-34) and from consumption during prescribed fire (2-35).

Issue—**Ecological Forestry Application**

- Two old-growth trees were cut on Pilot Joe.
- Lack of trust from some members of the community.
- BLM may not be correctly applying the Franklin and Johnson principles.

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Applicable Guidance--RMP Standards/Guidelines Related to the Applegate Adaptive Management Area .

- *Seek innovative approaches to achieve technical and social objectives (p. 36).*
- *Implement Franklin and Johnson ecological forestry proposal in the Middle Applegate Watershed (not an RMP guidance, but an agreement between the professors, BLM and the Secretary of the Interior, Final Report dated November 30, 2010, and available on the Pilot website).*

Implementation—How Addressed?

1. Demonstration of Franklin/Johnson principles expressed in project Purpose and Need (EA, pp. 1-1 to 1-7)
2. Focus on retaining older trees (greater than 150 years old) (EA, p. 2-23).
3. BLM report on Pilot Joe implementation to date (pending); includes explanation of harvest of two old growth trees in unit 26-1A; learned
4. Multi-party monitoring team established because “additional calibration and review will be needed during implementation”—Franklin/Johnson.
5. Adaptive management learning implemented in Pilot Thompson.
 - a. Time before sale of timber for public to review mark and BLM to process feedback.
 - b. Additional emphasis in marking guidance on determining trees older than 150 years.
 - c. More stringent demarcation and tracking of skips.
6. “We review third-party review as essential to gain and retain broad public acceptance”—Franklin/Johnson.
 - a. Third-party evaluation/monitoring evaluation and response by BLM prior to Decision Notice.
 - b. Consultation with Franklin and Johnson on third-party findings.
 - c. Field trip agenda to reflect third-party concerns.