

Medford District Office
Bureau of Land Management
3040 Biddle Road
Medford, Oregon 97504

Re Pilot Joe EA Comments.

July 26, 2011

This letter offers comments from the Klamath-Siskiyou Wildlands Center (KS Wild), Oregon Wild and Cascadia Wildlands regarding the Pilot Joe Environmental Assessment. Contact information for our organizations may be found at the conclusion of this document. The Middle Applegate Pilot, as informed by the restoration principals of Drs. Johnson and Franklin (“J&F Principals”), is a welcome step by the BLM to begin changing its management paradigm from an emphasis on industrial timber extraction toward forest ecosystem management.

Broadly, we strongly support the restoration of federal forests, especially those Medford BLM forests that have been degraded by road construction, damaged by high-grade and clearcut logging and altered through decades of fire suppression. Thinning small trees in overly dense forests can be part of a restoration approach that helps support the resilience of public forests and provide products to the local community.

Specific to this project, we support much of the proposed management of dense fir stands, the decommissioning of .4 miles of road and retention of all trees over 150 years of age. In particular, we endorse the fact that road construction initially contemplated as a part of this project was dropped from consideration.

We are, however, concerned with the application of this forest management approach at the landscape scale until data are gathered that demonstrate these principals produced the desired results. The mature forests, including habitat for the northern spotted owl, need to be managed in such a way as to ensure they function in the future as old forest habitat. Thus, we are concerned with “downgrading” northern spotted owl nesting, roosting, and foraging habitat. The pilot must balance the sometimes-competing objectives of forest resiliency and the conservation of older forest habitat and watershed health, including the recovery of the northern spotted owl and at-risk salmon species.

Purpose and Need

Much of the purpose and need of this project relates to demonstrating the J&F Principals. However, the BLM unnecessarily inserted many “values statements” into the purpose and need section of the EA and we disagree with several of the conclusions that the BLM reached, such as:

Forest management on federal lands in the Northwest *continues to be stymied by conflicting interests that pit timber production against habitat protection* and result in the legal and administrative gridlock noted by both the Secretary and the Oregon Congressional Delegation. BLM's ability to move from traditional forest management practices to a greater focus on ecosystem restoration and economic recovery depends, in part, on the social acceptability of restoration techniques. EA at 1-2, Emphasis added.

This statement is absolutely *not* the case on most public forestlands in the Pacific Northwest. If the BLM has been stymied by anything, it was "betting the house" on WOPR, a throwback to the type of logging that has created such a need for forest restoration on BLM forests in western Oregon to begin with.

Indeed, it is more the rule than the exception that National Forests throughout the Pacific Northwest, including the Rogue River-Siskiyou immediately adjacent to the Medford BLM, meet or exceed their annual timber targets. This is something that the BLM must be aware of, as we have explicitly written to the BLM about these facts on numerous occasions. Most BLM districts in western Oregon that have embraced restoration thinning have also met their targets. Moreover, just last year only twenty percent of Medford BLM timber sales were protested, and some of those protests were settled between timber companies and conservation groups, despite BLM resistance to implementing such mutually acceptable agreements.

Pilot Monitoring

As stated in our scoping comments, we generally support the dry forest restoration principals of Drs. Johnson and Franklin (we comment on the wet forest principals in other venues). Protecting large trees and roadless areas, thinning forests that are site verified as overly dense due to fire exclusion and focusing restoration activities outside of the most important northern spotted owl habitat are all important aspects of those principles that are being applied to this project. However, there has not yet been a determination if Pilot Joe strikes the right balance of dry forest restoration and late-successional habitat protection (along with spotted owl recovery). Post project monitoring will help inform whether this is the right approach, or whether certain aspects should be modified.

Define Restoration

Please remember that comprehensive forest restoration includes more than stand level silvicultural manipulation. Forest restoration includes activities such as road stormproofing and decommissioning, noxious weed abatement and in-stream wood placement. This project focuses on silvicultural aspects of forest restoration, not the broader goals of forest and watershed restoration. However, we do appreciate the inclusion of non-commercial activities, culvert upgrades and .4 miles of road decommissioning, but we think the project would benefit from the inclusion of more stream restoration, road density reduction and noxious weed control, among other restoration activities.

Dry Forest Restoration

The Pilot Joe EA includes a comprehensive section on Fire Regime, Condition Class, Stand Density Indices and other measures of forest resilience as they relate to fire, insects, competition stress and disease. One section details *Odion et al., 2004*, which concluded that fire exclusion in mixed conifer forests leads to stand structures not prone to uncharacteristically severe fire, as is commonly advanced in agency effects analyses. In fact, *Odion et al., 2004* found the opposite to be true: Time since fire predicted less, not more, severe fire. We appreciate the BLM's description of this research, but we disagree with the manner in which it differentiates this research from the pilot project forest conditions.

The BLM states, "The results of this study are not comparable to young stand conditions which are the subject of thinning proposals in the Pilot Joe project area." EA at 3-22. We disagree with that characterization of several of the stands in the project, which are mid-seral, with older forests inclusion and some large structures. These stands are functioning as northern spotted owl roosting or foraging habitat. For example, units 31-3A and 1-3A are do not exhibit "young stand conditions" but are certainly similar to many of the numerous stands that were studied in *Odion et al., 2004*. There is scientific controversy over the degree to which unmanaged older stands in mixed severity regimes (such as some of the forests in Pilot Joe) exhibit uncharacteristic fire severity if left unmanaged, while accounting for other variables such as weather or adjacency to young managed stands (which clearly do exhibit uncharacteristically severe fire). We suggest that the BLM study this issue on the mixed conifer forests that it manages in southwest Oregon before proceeding with what could turn out to be erroneous assumptions.

As a demonstration of the J&F Principals, the BLM pilot could influence further planning at an even larger scale. This seems to be the intention of the project: "There are plans to develop additional landscape level projects based on the Franklin & Johnson ideas in planning areas adjacent to the Pilot Joe planning area in Thompson Creek and Spencer Gulch-Applegate River sub-watersheds." EA at 2-19. As a demonstration, it is necessary that the BLM determine that these principals are indeed effective at restoring fire resilience and also protecting late-successional habitat and obligate species such as the northern spotted owl. We do not support advancing our "best guess" of the appropriate approach to restoration of these dry forest when it is entirely possible to research, monitor and adapt this management based on data collected in the course of the project.

We are engaged in project monitoring and attended the recent workshop that attempted to define the parameters of monitoring. We are thankful of the pre-project data collection and the section of the EA on monitoring (see EA at 2-23). However, we continue to believe that the operative question is: How will the BLM and/or US Fish and Wildlife monitor the owl to assess the impacts of this project on owl site fidelity, reproductive success or barred owl competitive advantage post-project implementation? There needs to be a feedback loop developed so that data on the effects of this project will influence future planning. This is especially true if the BLM plans to replicate this approach to the

larger landscape in the Middle Applegate or to all dry mixed conifer forests on BLM in western Oregon.

Roads

We are pleased that no roads will be constructed as a part of this project, which was possibly the most controversial aspect of this pilot project. At every public meeting and field trip on the pilot, roads have been discussed with strong local opposition to creating more roads on the landscape. We appreciate the BLM's willingness to plan a project without new roads.

However, at a recent project in the Ashland Resource Area (Wagner Anderson), Resource Area staff claimed that new road construction discovered during implementation reviews by KS Wild (that were not analyzed in the EA) were simply "operator spurs." The BLM authorized the construction of several of these short roads in that project. That sort of unanalyzed road construction in the Ashland RA has us concerned that unanalyzed road construction is the standard practice in the Ashland RA. Please refrain from building unanalyzed roads in the Pilot Joe EA, or at a minimum, please analyze those roads in an EA prior to construction.

Building new roads leads to a series of well-documented ecological and social impacts. For example, in the Applegate Valley and in the project area, off-road vehicles are very common, and several areas have become destinations for ORVs. Some ORV users are very destructive, and take any new opportunity to use even the slightest track, or create their own routes. New roads can become vectors for this activity, and open up more of the landscape to this potentially very destructive activity. New roads also become new trash dumps where all sorts of garbage are disposed of on these public lands.

It is essential that the Ashland Resource Area begin to reduce impacts of the existing road density within the planning area on hydrological function and terrestrial resources. The BLM did suggest some road decommissioning in the China Keeler project. We understand the difficulty of the BLM in decommissioning roads but are disappointed that road decommissioning will only take place on .4 miles of road.

Vehicular travel is the highest risk vector for non-native plant invasions. Be explicit about mitigation measures and their effectiveness under similar site conditions. Learn from past operations. Do not simply rely on generic mitigation measures from the Resource Management Plan that have not proven effective in this landscape.

Fuels Reduction

One of the Franklin and Johnson principals for restoring dry forests is assuring that activity fuels are removed. The BLM states, "Treatment of slash created from commercial thinning is prescribed for all stands being commercially thinned. Ladder fuel removal in addition to activity fuel is prescribed for eighty-five percent of the commercial thin units." EA at 3-30. How will the BLM ensure that this occurs? Will it

write this into the contract? The BLM must tie the activity fuels treatment to the project in a way that ensures that activity slash is indeed treated.

There is a proposal to treat an additional 600 acres in the planning area through non-commercial means. We think this is a very important part of the project. Many of those stands are younger and would benefit from intervention at this successional stage. What are the types of treatments that would be proposed? Will the variable density approach as is outlined in the restoration principles be applied to the non-commercial areas? We ask that the BLM consider leaving all broadleaf trees six inches in diameter and greater.

Yarding and logging systems

Low impact, innovative logging systems should be utilized in the project. That is part of the charter of the Applegate Adaptive Management Area (the land use allocation where the project is planned). Working with contractors to design and implement a project that uses light-on-the-land yarding systems is critical to the success of this pilot. Yarding can cause significant soil disturbance, which should be avoided. Please protect soils and riparian areas from disturbance by employing low-impact yarding systems.

Several BLM timber sales have led to a loss of soil through road construction and tractor yarding. Soil loss with respect to method of harvest is directly related to the amount of soil disturbed and bared by harvest activity, especially the density of skid trails and roads required to access the timber. Megahan (1981) found tractor logging on granitics to result in twenty-eight percent of the soil disturbed, ground cables with twenty-three percent, suspended cables with five percent and helicopter logging with two percent. In a Trinity County study on mixed soil types, skid trails averaged four to eight percent (6-12 km/sq.km) for clearcut areas (Scott et al., 1980).

http://www.krisweb.com/biblio/klamath_srcd_sommarstrometal_1990.pdf

Ground-based logging causes higher incidences of root damage and scarring of residual trees (compared to skyline systems). Kellog, L., Han, H.S., Mayo, J., and J. Sissel, "Residual Stand Damage from Thinning- Young Stand Diversity Study," Cascade Center for Ecosystem Management.

We are encouraged that Lauren Kellog is working with the BLM to design low-impact systems. Please take that opportunity to show how these systems can be used to minimize soil disturbance, erosion, noxious weed spread and other common problems from yarding systems in the Siskiyou Mountains.

The restoration principals include a variable density approach to better mimic the historic variability in the project area. Traditional yarding systems cannot accomplish the variable density that was characteristic in the planning area. Please design yarding systems to keep the skips and use this opportunity to demonstrate how that can be accomplished without losing the elements on the landscape that the principles are designed to protect. We are concerned with the flexibility afforded to gap size.

Survey and Manage

We appreciate the BLM's efforts to perform Survey and Manage in this project. Please ensure that all survey and manage species are protected in the project area. There are new agreed upon exemptions for survey and manage which the BLM should utilize in the next project that it plans in the area. Lastly, contrary to the thrust of the EA's section on great grey owl, it does seem like there are meadows and pastures in the project area that could support great grey owl foraging habitat.

Aquatic Conservation

In addition to our comments regarding roads and yarding and logging systems, we have some additional comment on aquatic conservation. The Northwest Forest Plan requires that the BLM maintain and restore the hydrological function of the riparian reserves of federal lands. If this pilot were applied at the landscape scale, we are concerned with the aquatic impacts of roading, yarding, and associated activities to the hydrological health. Please assure that compaction, erosion and/or soil loss are not increased as a result of this project.

Owl Habitat

Perhaps our largest concern with this forest management demonstration is that it would downgrade 175 acres of northern spotted owl NRF habitat. If this pilot is scaled up, or informs a future management strategy, dry mature forests functioning as northern spotted owl nesting, roosting and foraging habitat would be downgraded on an even larger scale. This could have serious environmental consequences to late-successional species, and harm the recovery of the owl. This concern is reflected in the Pilot Joe EA:

The Pilot Joe project proposes commercial harvest of 175 acres of NRF and 123 acres of dispersal-only NSO habitat. These treatments, coupled with the other recent and future foreseeable projects described above would increase fragmentation within the watershed. EA at 3-89

The BLM needs to ensure that it understands the implications of downgrading owl habitat before it proceeds with this model across the landscape. We appreciate the approach that the J&F Principals, in terms of identifying LSEAs and proposing to keep these areas in an untreated state to serve as refugia for owls and other LSOG obligates. However, unless there is a plan amendment to designate these areas in a protective status, there is no assurance that these LSEAs won't be logged as part of a standard matrix timber sale at some point in the future. Thus, the "downgrading" of owl habitat, as far as it is mitigated by LSEAs, is dependent on the long-term commitment to this landscape approach.

One of the purposes of this project is "incorporating elements of active management proposed by the US Fish and Wildlife Service in the draft revised Recovery Plan for the Northern Spotted Owl." EA at 1-3 Recovery of the northern spotted owl, as informed by the Revised Recovery Plan, requires the development of more, not less, owl habitat for the owl. We are concerned that even short term impacts to owl habitat will affect

recovery, especially with the bottleneck occurring with regard to owl populations. Thus, the recovery of the owl requires faithful implementation of the northern spotted owl recovery plan, such as recovery action 32, 10, and others.

Northern Spotted Owl habitat remains an issue in the project area. We are intrigued by the LSEA approach that Drs. Johnson and Franklin described for application to this project. Please avoid owl “take” by making the LSEAs large enough for owl nesting, roosting and foraging around high use areas. Please consider focusing thinning activities on small-diameter trees in a variable “thin from below” to retain mature and late-successional forest character where it still exists.

Fisher

We are concerned with the impacts to Pacific fisher, a candidate for listing under the ESA, through this project. According to the BLM:

Project activity disturbance effects to fishers are not well known. Fishers may avoid roaded areas (Harris and Ogan 1997) and humans (Douglas and Strickland 1987; Powell 1993). Disturbance from project activities would be temporally and geographically limited and would occupy a geographic area smaller than the average fisher home range. Seasonal restrictions listed as Project Design Features for other resources would also benefit fishers by restricting project activities until young are approximately six weeks old, approximately the age when fisher move young from natal dens and become more mobile. Fishers have large home ranges and would be able to move away from the action area while the disturbance is occurring, without impacting their ability to forage and disperse within their home range. EA at 3-85

How can the BLM validate the impacts of this project on Pacific fisher? While the BLM uses owl habitat as a surrogate for fisher, owls may have different movements on the landscape as compared with fisher. The BLM should ensure that connectivity of fisher habitat is maintained throughout this project. The BLM should study the impacts of the N&J principals on fisher before pursuing this approach at the landscape scale.

Late-Successional Forests

Only 35% of the project area is in late-successional condition. EA at 3-72. Broadly, we support the thrust of the prescriptions in this project, but we continue to have concerns about a subset of the on-the-ground mark where large trees are marked for cut. There are patches of older forest where the mark appears somewhat “aggressive” and owl habitat in these areas will be downgraded.

Late successional forest connectivity is important to maintain in the Middle Applegate Watershed (See Middle Applegate WA at 96). Sections 2 and 3 (T39S, R4W) were identified as “critical to connecting the Thompson Creek and Chapman-Keeler late successional areas.” Ibid. While there are two LSEAs in this general area, unit 2-1 is also

located in a small subsection of section 2. Please ensure that late successional habitat connectivity is developed and not harmed through this project.

The BLM should take a final look at the mark and ensure that no older trees are marked for cut and allow the public a chance to review, prior to the Decision Notice. Field review shows that the mark includes a fair number of large trees. The J&F principals generally would keep the largest, oldest trees in the stands, but that requires that skips are in places where these older structure exist. Very few trees in the project area or units are 150 years old, so the late-successional forest values that do persist in the project area must be protected with different criteria than the 150-year age threshold.

We are concerned that the mark does not reflect all the logging that will occur in these stands. Please ensure that large snags, large tail hold trees and other old structures are not lost in the logging operation. It also requires that the BLM layout and marking crews understand how timber sales are implemented, what OSHA rules will require of operators and not take too rigid interpretation of the J&F principals.

Watershed Concerns

Please note and adhere to the Watershed Analysis recommendations for the project. The Middle Applegate WA (1996 version 1.3) is replete with recommendations to reduce road densities to protect water quality and fish habitat. The BLM should avoid cumulative impacts of this project on watershed health and other resources of concern.

Take caution in the non-commercial units if you are entering riparian reserves by not allowing ground-disturbing equipment inside of riparian reserves. Threatened and sensitive fish species and their critical habitat exist near and downstream of the project area. Aquatic conservation is therefore a significant issue for this action.

Collaboration

KS Wild has been very involved in the collaborative process around the Middle Applegate Pilot and we have offered logistical, outreach and technical assistance in the planning process in dozens of meetings on the pilot over nearly a year. We appreciate the BLM's openness to a collaborative process and hope that the BLM uses this approach in more projects in the future. We firmly believe it is the only way to produce good projects that incorporate authentic restoration and community support. In the future, however, collaboration will be more effective if there are not rigid parameters applied prior to the collaborative process.

We are hopeful that the collaborative approach used thus far in the pilot will become the standard operating procedure for BLM management in Southern Oregon. Getting the community and interested stakeholders information early in the planning process, and allowing community and stakeholder concerns to be addressed in the early planning stages will be key to BLM forest management success in the future.

Conclusion

As a demonstration of dry forest principals in the Applegate Adaptive Management area, we look forward to the collection of validation data and adaptive management based on the results. As stated, we are concerned with the downgrading of spotted owl nesting, roosting and foraging habitat. In addition to owl monitoring, reference conditions can inform the authenticity of restoration projects.

We support thinning small trees in overly dense forests as a way to provide products to the local community. BLM forests are not, however, the reason for the current timber industry situation. Obviously, the application of this forest management approach requires assurances that the treatments are meeting the desired objectives, including authentic forest restoration based on sound assumptions, as well as the recovery of the northern spotted owl. Thank you for considering these comments.

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