Kelleher, Stephanie

From: Joseph Vaile <joseph@kswild.org>
Sent: Monday, May 07, 2012 3:18 PM
To: Kelleher, Stephanie
Cc: George McKinley; Jack Shipley; George Sexton; Lesley Adams; Gerritsma, John E; dh@oregonwild.org; Josh Laughlin
Subject: Pilot Thompson

Stephanie-

Pasted below are some re-scoping comments on Pilot Thompson. Let me know if you have any questions. Thanks!

Joseph

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

Re: Pilot Thompson Scoping Comments.

May 7, 2012

This letter offers additional comments from the Klamath-Siskiyou Wildlands Center (KS Wild), Oregon Wild and Cascadia Wildlands regarding Phase Two of the Middle Applegate Pilot: Pilot Thompson. Contact information for our organizations may be found at the conclusion of this document. The approach at Pilot Thompson, 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 restoration.

While we repeat many of the scoping comments that we already submitted, the issues we raised continue to be at the forefront of our most critical social, ecological and hydrological concerns. We also hope that we learn from the experience at Pilot Joe and adapt our approaches in this Adaptive Management Area in Pilot Thompson. The implementation that has already taken place at Pilot Joe has brought up a number of issues that BLM has an opportunity to address in Pilot Thompson. In no particular order those issues include:

- There is not enough coordination between the ID Team, marking crews, layout, logging systems, contractors, and fuels specialists. This lead to damaged leave trees, skips and gaps not coordinated with yarding corridors, commercial and noncommercial components of the project inefficiently implemented, along with a number of other issues.

- The gaps at Pilot Joe are too big (two 2 acre gaps are next to each other at Pilot Joe – BLM says the gaps

will only be one acre at the maximum end and generally much smaller). Creation of early seral habitat is decidedly not an objective of this project.

- There is far more residual damage to hardwoods, leave trees, snags and other stand elements than was predicted pre-treatment. Conservation and restoration of leave trees is the basis of the prescriptions, so this loss is particularly troubling.

- Follow-up fuels treatments and the reintroduction of fire into the stands has not been coordinated.

- Wet weather yarding and hauling may have caused impacts to roads, soils and streams.

- There were impacts to Northern spotted owl habitat that were not anticipated or disclosed in the analysis.

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 is part of a restoration approach that helps support the resilience of public forests and provides products to the local community. Specific to this project area, the public lands on Thompson Creek are important for the salmon habitat that they provide. The lands also include older forests that contribute to species persistence that depend on late-successional habitat. Thompson Creek itself - and its tributary stream network - is low gradient with spawning habitat for many fish species, including threatened coho salmon. The BLM can embrace these qualities of the Thompson Creek watershed and work to first protect watershed integrity and late-successional forest structure, composition and function and then determine the priorities for active restoration management. To that end, we are very pleased with the efforts to reduce the road density network through this project. We hope the BLM can make that a funding priority.

Since we have had a chance to review the Pilot Thompson planning map, we have a number of specific concerns with the planned units and road construction.

1) Road construction: Road construction is contemplated in the Pilot Thompson project, totaling 1.8 miles. We are very concerned with the impacts of building roads, for reasons described below. Specific to the proposed roads in this project, why is BLM contemplating to build such a long segment of road in 39-5-6, if you are only accessing density management (described on scoping notice at page 14)? A road is not required for those activities. We are primarily concerned with this road segment and the road in 39-5-25, which seems to be a low priority area for treatment. There are enough roads in the planning area that the BLM could advance a project without building roads. If the BLM is simply building roads to “test difficult issues” this is not an appropriate reason. Roads are expensive to build and create a maintenance backlog. We would like to see an analysis of the benefits/trade offs of each road segment.

2) Riparian Logging: The BLM identifies 140 acres or riparian reserve thinning, but it is not clear from the scoping notice where those areas are located. It is likewise not clear what kind of actions would happen in these streamside areas. Why are non-commercial treatments not adequate to restore these riparian areas? How would the BLM keep equipment out of reserves? What type of soils disturbance would be caused from logging in reserves? Where would yarding corridors be located? Riparian logging presents many challenges and the BLM should either address fuels needs without commercial disturbance to reserves, or site-specifically address potential impacts through a collaborative process. There is a lot of effort to protect and restore riparian areas in the Thompson Creek drainage, we should ensure first that no damage will occur that could be avoided.

3) Treatment area prioritization: While we broadly support the selection of areas for treatment (generally, north and west facing slope emphasized for LSEA, south and east facing slopes for fuels reduction), we are very puzzled by the inclusion of some of the units. For example, 39-5-25 has very wet elements and is at the top of

the watershed, where there is more moisture. It would seem like a low priority for treatment. Please explain how these specific units were selected for treatment, particularly those that do not appear very "dry."

4) Gap size: Creating in-stand variability should be appropriate to the site and not in excess of ½ acre. While gaps up to 1 acre are stated in the principals, it seems that the creation of gaps was abused in the Pilot Joe.

5) When treating spotted owl nesting, roosting and foraging habitat, please refrain from downgrading and removing the habitat.

Johnson and Franklin

We generally support the dry forest restoration principals of Drs. Johnson and Franklin. We are very concerned about the moist forest principals, in particular the use of clearcut logging techniques and the need to develop late-successional older stands in the Pacific Northwest. We comment on the moist forest techniques in other venues. In the dry forests, 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.

We continue to have concerns that these principals might be applied to the broad landscape without understanding the implications of this approach. The BLM should adapt management approaches based on the monitoring data from the Pilot Joe project. There are several lessons to be learned right off the bat (see above). We are active in the planning, collaboration and implementation monitoring of the Pilot Joe project. But, 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.

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 along with road decommissioning, not the broader goals of forest and watershed restoration. This project would benefit from the inclusion of more stream restoration, road density reduction and noxious weed control, among other restoration activities.

Lastly, please consider the condition of the landscape on both public and private lands then find the right landscape-level mix of treated and untreated stands necessary to recover spotted owls and maintain viable populations of other imperiled species that depend on dense forests. Consider how much extra spotted owl habitat needs to be conserved to mitigate for the competitive influence of the barred owl and habitat removal on public and private land.

Roads

No roads should be constructed as a part of the Pilot Thompson project. The BLM identified 1.8 miles of road for construction. Building new road is possibly the most controversial aspect of active forest management in this watershed. There is often strong local opposition to creating more roads on the landscape. We appreciate the BLM’s willingness to plan a project without new roads at Pilot Joe, and we hope that you will again propose no new roading at Pilot Thompson.

Suggested Alternative: We formally request an alternative for this project that does not require the construction of new roads and lessens the road density in the planning area. While limited, short operator spurs might be necessary on a case by case basis, we recommend that those are vetted through the collaborative process for this project.

Building new roads leads to a series of well-documented ecological and social impacts. For example, in the Appelgate 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 ecologically destructive activity. An example of this is in the Ferris Gulch area, within the Pilot Thompson planning area. New roads also become new trash dumps where all sorts of garbage are disposed of on these public lands.

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.

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 Thompson.

We reiterate our concerns about the impacts of roads on sediment production, which are outlined in the peer reviewed study by Colombaroli and Gavin entitled Highly Episodic Fire and Erosion Regime Over the Past 2,000 Years in Siskiyou Mountains, Oregon. We have submitted this report to BLM on various occasions – the study area is very close to the Pilot Thompson Project area.

Collaboration

We have 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.

Fuels Reduction

One of the Franklin and Johnson principals for restoring dry forests is assuring that activity fuels are removed. 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.

Many stands in the project area are younger and would benefit from intervention. What treatments are proposed in non-commercial areas? 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. 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. We are concerned with the amount of damage to corridors at the Pilot Joe project.

This may be due to corridor length.

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.

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

Please fully implement the Survey and Manage program. We urge you to apply Survey and Manage exemption criteria to this project, including the legacy tree and dry forest restoration exemption.

Owl and Pacific Fisher Habitat

The BLM needs to ensure Northern spotted owl habitat is preserved in the course of this project. The BLM needs to understand the implications of downgrading owl habitat before it proceeds with this model across the landscape. Late successional forest connectivity is important to maintain in the Middle Applegate Watershed (See Middle Applegate WA at 96). There is a need to maintain complex forest structure (including dead wood and shrubs) when applying "treat and maintain" in this project. Please have the marking crews understand the implementation requirements so that these structures are not lost once the operations commence.

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." 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.

Pacific fisher is a candidate species for listing as "endangered" under the Endangered Species Act ("ESA" – 16 U.S.C. §§ 1531-1544) due to substantial declines and continued uncertainty about viability of the West Coast distinct population segment ("DPS"). See 69 Fed. Reg. 18770 (April 8, 2004) (finding that Pacific fisher warrants protection as an endangered species). BLM policy requires that all Federal candidate species "will be conserved as Bureau sensitive species." The BLM must review its proposed actions to "determine whether or not special status species occupy or use the [a]ffected area or if habitat for such species could be affected" and "[m]odify, relocate, or abandon proposed actions that contribute to the need to list" species under the ESA. Medford District Resource Management Plan ("RMP") at 50.

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.

Thank you for considering these comments.

/s/ Joseph Vaile

Klamath Siskiyou Wildlands Center
Joseph Vaile
Conservation Director
P.O. Box 102
Ashland, OR 97520

Cascadia Wildlands
Josh Laughlin
Campaign Coordinator
P.O. Box 10455
Eugene, OR 97440

Oregon Wild
Doug Heiken
PO Box 11648
Eugene, OR 97440