



United States Department of the Interior
BUREAU OF LAND MANAGEMENT
MEDFORD DISTRICT OFFICE
ASHLAND RESOURCE AREA
3040 Biddle Road
Medford, Oregon 97504



DECISION RECORD
For the
PILOT THOMPSON PROJECT
(DOI-BLM-OR-M060-2013-0003-REA)

INTRODUCTION

This document describes my decision, and reasons for my decision, regarding the selection of a course of action to be implemented for the Pilot Thompson Project. The Revised Environmental Assessment (REA) for the Pilot Thompson Project (DOI-BLM-OR-M060-2013-0003-REA) documented the environmental analysis conducted to estimate the site-specific effects on the human environment that may result from the implementation of the Pilot Thompson proposal. The Pilot Thompson EA was originally issued for public review on February 21, 2013. The EA public review period ended on April 26, 2013. In response to Interdisciplinary Team and public comments received during the original Pilot Thompson EA review period, a revision of the Environmental Assessment was completed and posted to the Medford District website (<http://www.blm.gov/or/districts/medford/plans/index.php>) and the Pilot's website (<http://www.blm.gov/or/districts/medford/forestrypilot/pilot-projects.php>) on August 1, 2013.

BACKGROUND

In December 2010, the Secretary of the Interior designated Forestry Pilot Demonstration Projects in the Medford, Roseburg, and Coos Bay BLM Districts in southwest Oregon to demonstrate the application of principles of restoration developed by Drs. Jerry F. Franklin and K. Norman Johnson (*Applying Restoration Principles on the BLM O&C Forests in Southwest Oregon (2010)*). In collaboration with Drs. Franklin and Johnson, the BLM's goal was to demonstrate how the Franklin/Johnson forest restoration principles can provide both ecological and economic benefits.

The Medford BLM chose to implement the Middle Applegate Watershed Pilot in separate phases; each phase focuses on a sub-watershed (or group of sub-watersheds) within the 5th field Middle Applegate River Watershed. Planning for the first phase of the pilot, called the Pilot Joe Demonstration Project, was completed in 2011. The project proposed to treat 889 acres in the south half of the Humbug Creek sub-watershed, of which 299 acres were proposed for commercial timber harvest. Presently, all commercial treatments have been harvested. Non-commercial treatments have begun and are scheduled to be completed over the next several years. The Pilot Thompson Project is the second phase of the secretarial pilot.

The Pilot Thompson Project was designed to treat 2,354 to 2,720 acres of Dry Forest vegetation using various commercial and non-commercial forest management methods. The ecological forestry project will be achieved by implementing a series of forest prescriptions that define the size of material, the species and the conditions that guide selection of trees to be removed or retained. Each prescription was tailored to a specific forest type based on plant associations. The ecosystem restoration principles developed by Drs. Jerry Franklin and Norm

Johnson guided the development of the forest prescriptions. The intent of these principles is to move the current conditions toward desired forest conditions that include the maintenance of older trees, restoration of characteristic structure and composition, and increased heterogeneity. These conditions will result in more resilient forest stands.

The project is on BLM administered lands within the Applegate Adaptive Management Area (AMA) land allocation as defined in the Northwest Forest Plan and the Medford District BLM Resource Management Plan (RMP). The main objective of the Applegate AMA is to develop and test forest management practices including partial cutting, prescribed burning, and low impact approaches to forest harvest that provide for a broad range of forest values, including late-successional forest and high quality riparian habitat. The AMA is also intended to be used to develop and test management approaches that integrate and achieve ecological and economic health and other social objectives (USDI 1995, p. 36).

Within the BLM ownership, Oregon and California Lands (O&C) comprise 88% of the planning area with Public Domain (PD) at 12%.

The Public Land Survey System (PLSS) description of the Pilot Thompson Project is T38S-R04W-Sections 19, 20, 27-31, 33, 34; T39S-R05W-Sections 12, 25; and T39S-R04W-Sections 3-6, 8, 9, 19, 30, 31 in Jackson County, Oregon, Willamette Meridian (Maps 1 to 3).

THE DECISION

As the Responsible Official, it is my decision to implement a modified version of Alternative 2, as described below.

My decision authorizes the following actions:

- The implementation of timber harvest on approximately 218 acres (of the 1,226 acres analyzed in the REA under Alternative 2) of conifer forest stands using a Variable Density Thinning (VDT) prescription using either cable or tractor harvest methods, as described in the REA (pp. 2-25 to 2-28, and 2-32) (Table 1).
- Follow-up pre-commercial thinning/fuels reduction treatments will occur as described in Table 1 and in the REA (pp. 2-28 and 2-33) to mitigate hazardous fuels generated from timber harvest (activity fuels). Follow-up maintenance underburning may take place within 5 years following initial treatments. Understory Reduction may also occur, if needed, as described in the REA (p. 2-28). Post-harvest evaluations will determine the extent and method of treatments needed (hand pile and burning, and/or underburning).
- Approximately 0.24 miles of temporary road construction will be constructed to provide access for units 19-4 and 34-3 (Table 2).
 - Road 39-4-20 was analyzed as permanent road construction in the REA (pp. 2-12 and 3-44); however, it has been determined that as the short road spur will not provide access to additional forest stands and the adjacent stand will not be re-entered in the near future, there is no need to establish and maintain a permanent road at this site. After harvesting activities are completed, the road will be barricaded, the road surface roughed, water barred, and seeded, and slash and other debris will be placed along the road's length to provide ground cover and discourage OHV use.
 - I elect to **not** construct road 39-4-6.1 into unit 6-1 (52 acres), and therefore defer harvest in that unit at this time. It is easily accessible via helicopter (adjacent to previously used helicopter

landing) and I prefer to include this unit in a proposal when helicopter yarding becomes viable. In addition, logging by helicopter reduces the risks associated with building a full benched road on a very steep sideslope.

- An estimated 20 miles of existing roads will be used as haul routes and maintained as described in the REA (Table 2-4, pp. 2-10 to 2-12). Renovation of approximately 1.4 miles of road will occur on existing BLM roads, as described in the REA (p. 2-9) to access commercial harvest units.
- An estimated 1.21 miles of existing road that are currently closed and are decommissioning naturally will be converted to fully decommissioned status and removed from the system road network. (Note: an additional 1.2 miles of road are being fully decommissioned/obliterated through another contract not associated with the Pilot Thompson Project (REA, p. 3-64)). Funding for additional road decommissioning is expected within the next two years.
- One designated skid trail will be constructed to access unit 20-1, as described in the REA (p. 2-9).
- Timber harvesting activities and follow-up treatments will be implemented through a combination of commercial timber sale and service contracts.
- All applicable Project Design Features (PDFs) will be incorporated into the timber sale contract as required conditions of this project. A complete listing of the PDFs can be found in Chapter 2 of the REA (pp. 2-33 to 2-45).

An estimated 1,008 acres within units analyzed in the REA as commercial harvest units will not be included in this decision for the following reasons:

- I have elected **not** to harvest in Unit 3-2 (19 acres) at this time because more evaluation work would be required in the form of preparing a late-successional reserve assessment prior to habitat manipulating activities (REA, p. 2-41).
- The recent (April 25, 2013) court decision to remand the 2011 Survey and Manage Settlement Agreement back to the District Court for further proceedings has affected how we manage Great Gray Owl habitat in the project area (REA, pp.1-8 to 1-9). Unit 31-2 (60 acres), Unit 5-1 (21 acres), and a portion of Units 30-2 (100 acres) and 19-1 (3 acres) were dropped as a result of this recent change.
- Almost all of the proposed Riparian Reserve Thinning treatment acres are located in stands that were dropped from commercial treatment consideration. In this project, it was determined that such treatments are most economically packaged in a stewardship or non-commercial contract, rather than a conventional timber sale contract. Therefore, I have elected to **not** include treatments in riparian reserves at this time.
- Most of the remaining “commercial” units analyzed in the REA (approximately 700 acres) have been determined to have low volumes (uneconomical for a timber sale due to various stand conditions) and will be evaluated for inclusion into a stewardship contract at a future date. For many of these stands, the need for treatment involves mostly small diameter trees. Also, it is important to note that as timber sale layout and preparation occurs, boundaries of units identified for analysis in the EA are refined based on site conditions, access and harvest system constraints, economics, and other considerations. A reduction in acres occurs as a result of this process as well.

I did **not** select Alternative 3. Therefore, there will be no helicopter logging at this time until we have better determined that the level of harvest in the proposed helicopter units is economical. I will continue to work with industry experts to determine when such operations become feasible. Any future proposal for helicopter yarding under this REA will be preceded by a public field trip(s) to review the mark and discuss the treatment, and will also be preceded with another decision under this REA.

Additional decisions related to non-commercial thinning treatments (service contracts) and uneconomical units involving commercial timber (stewardship contracts) will follow, each allowing for further public discussion and review. Both non-commercial and stewardship activities are routinely funded in the Ashland Resource Area. There is approximately 1,700 acres of non-commercial and uneconomical commercial proposed units available. I am deferring decisions on these activities because I have not yet had the opportunity to prepare these units and share the mark for review with the community.

In addition, road decommissioning proposals will be implemented outside of the timber sale, service or stewardship contracts. In fact, road obliteration involving five stream crossings and over a mile of road within the Riparian Reserve is under contract to begin work in August 2013.

I believe the decision for Alternative 2 with the described modifications is a balanced approach that will lead to a viable project while best addressing community and public concerns.

Table 1. Pilot Thompson Project Units by Silvicultural Prescription, NSO Habitat, Harvest Method and Associated Treatments.

Unit No.	Acres	Harvest Method	Silvicultural Prescription		Associated Treatments
			Harvest Prescription	NSO Habitat Type & Effect	
19-1	17	Cable	VDT	Dispersal T&M, NRF Downgrade	Activity, UR
19-4	26	Cable	VDT	NRF Downgrade	Activity
19-6	9	Tractor	VDT	Dispersal and NRF T&M	Activity, UR
20-1	9	Tractor	VDT	Dispersal T&M, NRF Downgrade	Activity, UR
29-1	21	Cable	VDT	Dispersal T&M, NRF Downgrade	Activity, UR
30-2A	19	Cable	VDT	Dispersal T&M, NRF Downgrade	Activity, UR
34-1A	23	Cable	VDT	Dispersal and NRF T&M	Activity, UR
34-1B	5	Cable	VDT	Dispersal and NRF T&M	Activity, UR
33-3	39	Cable	VDT	Dispersal T&M	Activity, UR
33-4	17	Cable	VDT	Dispersal T&M	Activity, UR
34-2	13	Cable	VDT	Dispersal T&M	Activity, UR
34-3	20	Cable	VDT	Dispersal T&M	Activity, UR
TOTAL	218				

Abbreviations:

Harvest Prescription: VDT = Variable Density Thinning

NSO Habitat: T&M = Treat and Maintain

Associated Treatments: Activity = pile & burn tree tops and limbs to reduce fuels as needed, UR = Understory Reduction

Table 2. Pilot Thompson Project Road Construction

Road Number	Approximate Length (miles)	Existing Surface:	Control	Type	Construction Purpose
		Depth (inches) and Type			
39-4-20	0.12	NAT	BLM	Temporary Road	Access into Unit 19-4
38-4-34.1	0.12	NAT	BLM	Temporary Road	Access into Unit 34-3
Total Temporary	0.24				

Abbreviations:

Existing Surface: NAT=Natural

Control: BLM=Bureau of Land Management

Table 3. Pilot Thompson Project Road Decommissioning

Road Number	Approximate Length (miles)	Existing Surface:	Control	Decommission Type
		Depth (inches) and Type		
38-4-28.2	0.46	NAT	BLM	Closed, convert to Fully Decommission
39-4-19	0.4	NAT	BLM	Closed, convert to Fully Decommission
39-4-3.1	0.35	NAT	BLM	Closed, convert to Fully Decommission
Total Mileage	1.21			

Abbreviations:

Existing Surface: NAT=Natural

Control: BLM=Bureau of Land Management

Table 4. Pilot Thompson Project Haul Routes

Road Number	Length	Surface Type	Control	Possible Road Stabilization or Drainage Improvements	Seasonal Restrictions for Log Haul
38-4W-17.00A	0.47	BST	BLM	3	0
38-4W-17.00B	0.76	BST	BLM	3	0
38-4W-17.00C	2.36	BST	BLM	3	0
38-4W-20.01	0.79	NAT	BLM	Open closed road, brush and blade, improve drainage, close after use	1
38-4W-28.00A1	0.15	ASC	BLM	3	1
38-4W-28.00A2	1.72	ASC	BLM	3	1
38-4W-28.00A3	1.03	ASC	BLM	3	1
38-4W-28.00B1	0.81	ASC	BLM	3	1
38-4W-28.01A1	0.1	PRR	BLM	3	1
38-4W-28.01A2	0.3	PRR	BLM	3	1
38-4W-28.01B	0.56	ASC	BLM	3	1
38-4W-29.00A	1.02	ASC	BLM	3	1

Road Number	Length	Surface Type	Control	Possible Road Stabilization or Drainage Improvements	Seasonal Restrictions for Log Haul
38-4W-33.00	1.19	PRR	BLM	3	1
38-4W-33.01	0.99	ASC	BLM	3	1
38-4W-34.00	0.25	ASC	BLM	Open closed road, brush and blade, improve drainage, close after use	1
38-4W-34.01	0.11	NAT	BLM	Open closed road, brush and blade, improve drainage, close after use	1
38-4W-34.02	0.23	NAT	BLM	Open closed road, brush and blade, improve drainage, close after use	1
38-4W-35.03C1	0.17	NAT	BLM	3	1
38-4W-35.03C2	1.27	NAT	BLM	3	1
39-4W-19.01A	1.35	ASC	BLM	3	1
39-4W-19.01B1	0.13	ASC	BLM	3	1
39-4W-19.01B2	1.28	ASC	BLM	3	1
39-4W-19.01C	2.07	NAT	BLM	3	1
39-4W-19.05	0.18	NAT	BLM	3	1
39-4W-20.00	0.27	NAT	BLM	3	1
39-5W-24.00A1	0.02	ASC	BLM	3	1
39-5W-24.00A2	0.63	ASC	BLM	3	1
39-5W-24.00A3	0.1	ASC	BLM	3	1
39-5W-24.00B1	0.08	ASC	BLM	3	1
Total Miles	20.39				

Abbreviations:

Existing Surface: NAT=natural; ASC=Aggregate Surface Course; BST=Bituminous Surface Treatment; GRR=Grid Rolled Rock; PRR=Pit Run Rock

Control: BLM=Bureau of Land Management; PVT=Private

Possible Improvements: 3=no road stabilization/drainage improvements. All BLM roads proposed for haul routes would be maintained to BLM-Standards

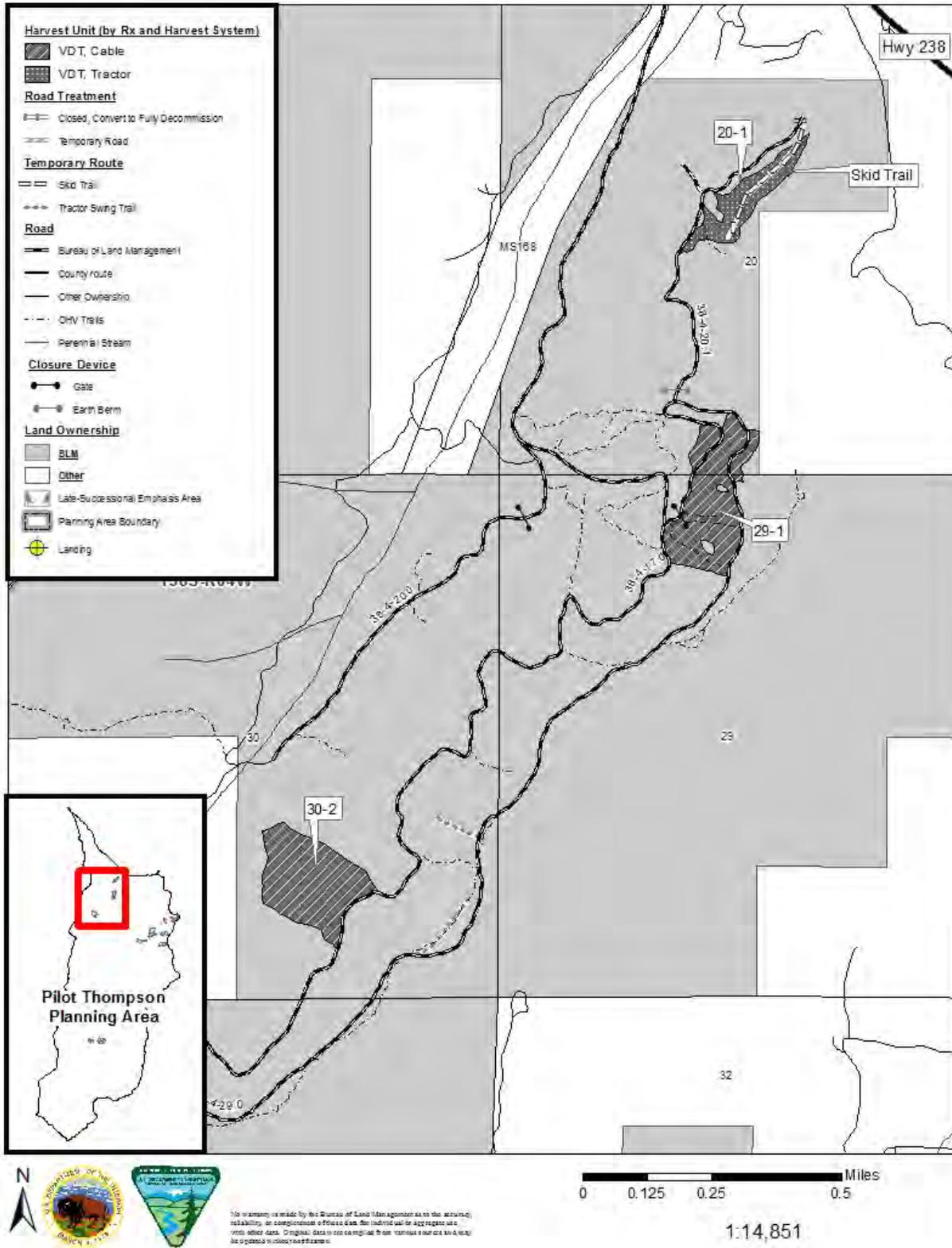
Seasonal Restrictions: 0=no restrictions

(for log hauling) 1=hauling restricted between 10/15 and 6/1

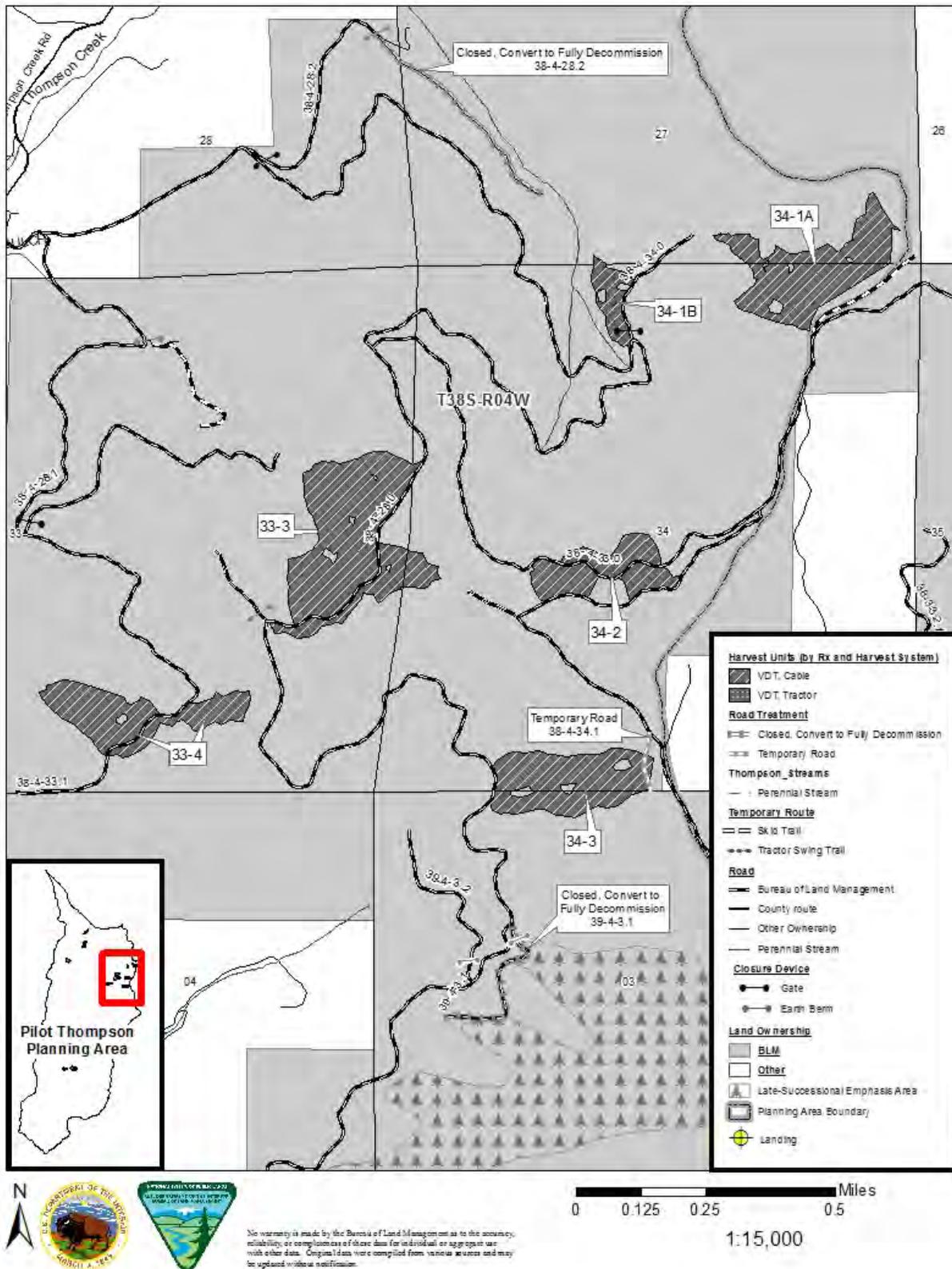
2=hauling restricted between 11/15 and 5/15

Note: If Purchaser furnishes and places additional rock, seasonal restrictions could be modified as approved by the Authorized Officer.

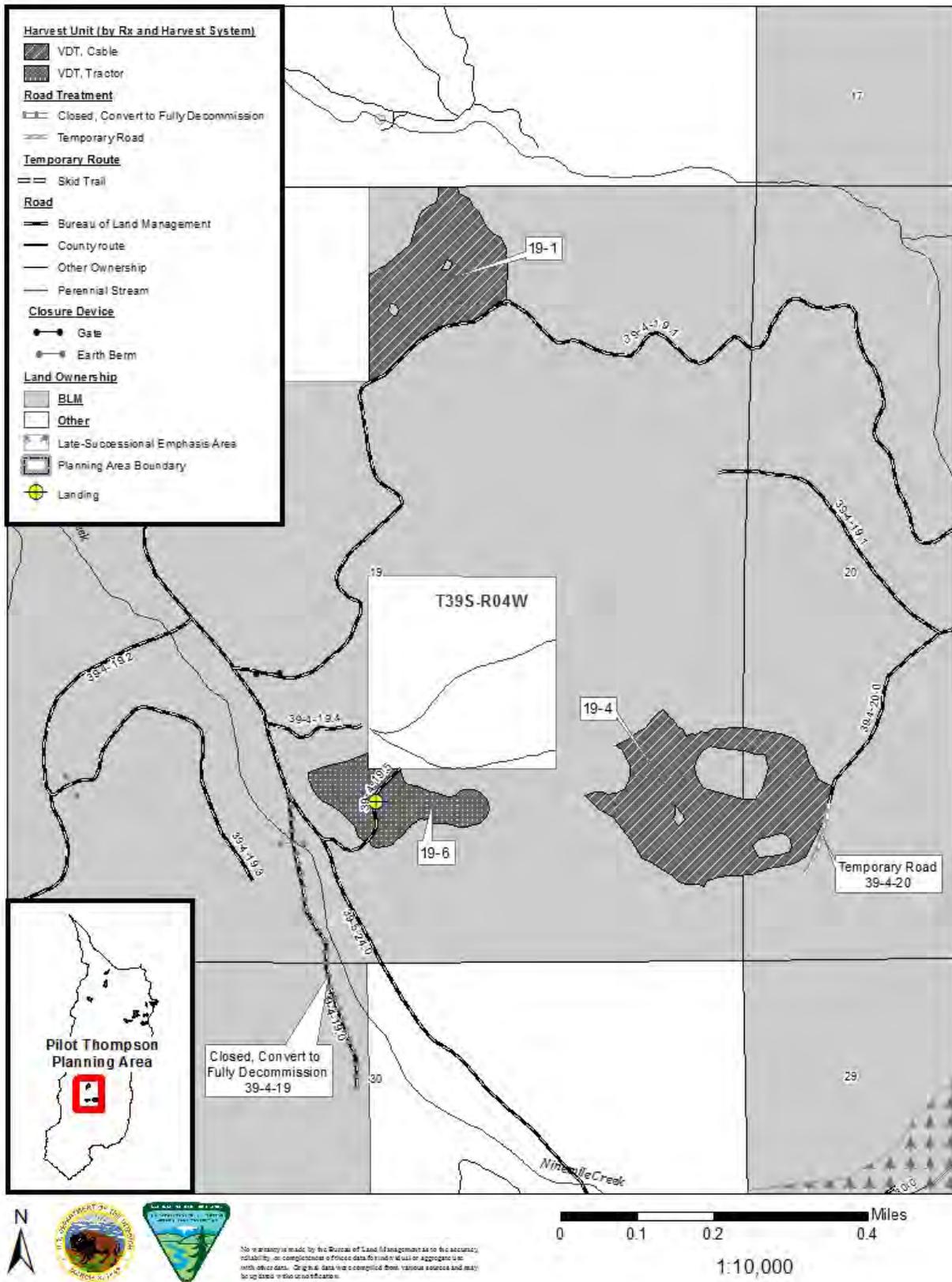
Map 1. Pilot Thompson Project – Ferris Gulch Area



Map 2. Pilot Thompson Project – Hinkle Gulch/Tallowbox Creek Area



Map 3. Pilot Thompson Project – Ninemile Creek Area



DECISION RATIONALE

My decision to implement a modified version of Alternative 2 is based on consideration of the relative merits and consequences of either implementing or not implementing the Pilot Thompson Project, as documented in the Revised EA (REA) and Finding of No Significant Impact (FONSI). I have also considered all public comments and concerns received. I have determined that my decision outlined above best meets the purpose and need for this project, as identified in Chapter 1 of the Pilot Thompson Revised EA.

Context for Decision Rationale

In making the decision for Pilot Thompson, I reflected on a number of factors. The issues related to the analysis and effects in the Revised EA are well documented in Appendix D: Response to Comments, so I won't repeat them here. However, discussions in public meetings and field trips, social media, emails, and printed media has indicated that there is a distinct difference of opinion about the Pilot project and its design.

There is disagreement over the Purpose and Need for the project. I established the Purpose and Need to continue with implementing a *demonstration* of the Franklin and Johnson restoration principles. This Purpose and Need is consistent with the Secretary's designation of the pilot projects.

Pilot Thompson is a part of the 80,000-acre Middle Applegate Watershed Pilot, which is at a scale large enough to eventually draw conclusions about the efficacy and acceptability of the principles for consideration at larger scales. While critiques about the principles were offered as part of the comments to Pilot Thompson, the project is not about debating the Franklin/Johnson approach, but to demonstrate it, learn from its phases, and utilize adaptive management to improve its implementation. Only after the entire Middle Applegate Watershed Pilot is completed can we adequately draw conclusions about its benefits and impacts as a management approach for the future.

Public concerns about the economics of helicopter yarding, riparian treatments and road construction were designed as treatment options in the various alternatives to display tradeoffs related to those concerns. Hence, while the specific Purpose and Need of the project was strictly determined, alternatives were designed to display the differences over a number of public concerns.

Some of the disagreement stems from the interpretation of the Franklin and Johnson objectives. While some may believe that "restoration" is meant in its purest sense, Franklin and Johnson believe that the debate over timber management on the BLM's O&C lands can be addressed by providing a level of harvest as a result of applying restoration principles. Because the term "restoration" has meaning that is more pure than what Franklin and Johnson proposed in their principles to also achieve some level of timber harvest, they have re-labeled their approach as "ecological forestry". The term simply means that ecological principles are applied with an expectation that both ecosystem services (such as water, habitat, etc.) and timber extraction will occur (REA, p. 1-1 and Appendix C, p. C-4). Thus, the Franklin/Johnson approach is neither timber nor restoration centric, but a blend to provide for both.

Pilot Thompson is a good example of "ecological forestry."

The Pilot Thompson planning area contains approximately 3,850 acres set aside as areas reserved from timber harvest by the Northwest Forest Plan, leaving about 10,560 forested acres to plan for ecological forestry treatments. Biologists assessed the landscape for ecological needs before the harvest of timber was designed into the project. This was done by identifying the Late Successional Emphasis Areas (LSEAs) as a strategic location for large blocks of more complex and older wildlife habitat, especially for the northern spotted owl, the Siskiyou Mountain salamander and the great gray owl (REA, p. 1-6). This exercise identified the retention of 2,632 acres of existing habitat not subject to timber harvest at this time. When the 2,632 acres are added to the acres reserved from timber harvest under the Northwest Forest Plan (3,850 acres), 36% of the Pilot Thompson Planning Area (6482 of 14,420 acres) is being emphasized for retention of dense, older forest. This is consistent

with Drs. Franklin and Johnson's goal to retain approximately one third ($\frac{1}{3}$) of the landscape to serve as denser forest patches of mature or late-successional habitat. The opportunities for vegetation treatments, including some level of timber harvest, were considered after the needs for habitat was determined first. The remaining forested lands were then assessed by the silviculturist for applying the Franklin and Johnson restoration principles (REA, p. 1-5 to 1-7).

The Pilot Thompson planning area forested lands (11,865 acres) only contain about 21% "reserve allocations", thus leaving nearly 80% (or approximately 9,295 acres) of the forested lands for potential application of the Franklin and Johnson principles (including some of the lands being managed for dense forest conditions).

- Allocation of dense, older habitat and untreated habitat needed for the recovery of the northern spotted owl reduced treatment options by about 2,630 acres.
- Young stands less than five years old and/or with trees less than 5 inches diameter at breast height (DBH), and young pole stands (mostly old clearcuts with trees up to 11 inches DBH) where treatment is not needed at this time reduced treatment options by about 2,900 acres.
- Stands where no reasonable or legal access exists and stands where the cost of treatment is highly uneconomical reduced the net acreage for treatment opportunities by another 1,100 acres.

The net result of applying the Franklin and Johnson principles is a range of vegetation treatments from 2,354 to 2,720 acres, or 20-23% of forested lands in the Pilot Thompson planning area. The percent of the forested lands that would be treated through a timber sale ranges from 1226 to 1592 acres (or 10-13% of the planning area) depending on whether helicopters would be used as a yarding method.

Overlaid on those acres, however, is another suite of guidelines related to the recovery of the northern spotted owl and management of their critical habitat. For example, there are treatment considerations that set the amount of canopy that can be reduced, thus further influencing the amount of timber that may be harvested on any given unit.

The Pilot Thompson planning area has been the focus of substantial fuels reduction and broadcast burning treatments over the last 15 years or so. These previously treated areas, in combination with non-forest and oak woodland stands that have few treatment needs at this time, add about 2,500 acres of the planning area that was excluded from ecological forestry treatment consideration at this time.

How well the Franklin and Johnson approach works when there are land use allocation restrictions and reserves is one of the questions to be addressed when all the phases of the Middle Applegate Pilot are completed.

Transparency and Collaboration

Since the beginning of the Pilot projects, the Medford District BLM has worked to create a higher level of transparency and collaboration. There is a range of opinion about what "collaboration" means and how to implement it. I have learned it is important to better define what collaboration is and its expectations for those who wish to participate. Many commenters expressed dissatisfaction with the collaboration process. Regardless of how individuals define collaboration and opine about whether BLM successfully collaborated, I am proud of the cumulative total of efforts that were collaborative, informative, and/or efforts at transparency (refer also to p. 19):

- The public established the process by which "screens" are applied to the landscape to identify the restoration needs and subsequent project proposals. This was developed for Pilot Joe and carried forward to Pilot Thompson. The emphasis in Pilot Thompson clearly resided with identifying, assessing, and protecting the most valuable habitat remaining in the watershed.

- There were numerous field trips, including ones with Drs. Jerry Franklin and Norm Johnson, that included interested publics to help design the implementation of the principles on the ground, and provide feedback on implementation.
- Weekly conference calls were held among KS Wild, the Applegate Partnership, the Southern Oregon Forest Restoration Collaborative, and the BLM to collaborate on the focus and direction for the Middle Applegate Pilot, allowing for early recognition and consideration of important issues. These conference calls continue.
- Relevant issues were highlighted in a Scoping Report providing immediate feedback to the public on their scoping comments. The Scoping Report is unique to Pilot Thompson.
- The BLM invited three members of the community to participate on the ID Team to help us understand the social issues better.
- The BLM established and funded a multi-party monitoring team for an independent look at the effectiveness of the Pilot projects.
- A collaborative transportation team of residents, environmental interests, industry, and BLM staff took a hard look at the existing road system, opportunities for road reduction and rehabilitation, and additional road needs. The team's assessment was incorporated into the alternatives for Pilot Thompson.
- We held intimate community meetings where gatherings took place in residences to allow for discussions focused on residents' concerns.
- We developed a collaborative proposal for several units adjacent to private residences.
- The Pilot website is replete with project information, more than any other project in SW Oregon.
- We allowed for an extensive review of the potential timber sale mark for Pilot Thompson, and extended the EA comment period by 31 days.

I have personally visited most of the proposed Pilot Thompson timber sale units, all of the road and skid trail proposals, and as many of the sites as I could re-locate that were the subject of photo documentation from the citizen's monitoring effort. I followed up on the EA comment period with a public field trip to look at large tree marking on units 19-4 and 34-1A. Subsequently, several of my staff and I have cored trees over 26.1 inches DBH for age in proposed units, the results of which are explained, below (p. 18).

I have read every comment letter and personally identified the key issues that I felt needed attention from Drs. Franklin and Johnson. I invited Drs. Franklin and Johnson down for a field trip to discuss with the public the key issues identified during the 60-day EA comment period. The field trip consisted of a walk through in unit 19-4, arguably the most controversial of the Pilot Thompson units, where we discussed: (1) whether the unit should be treated, (2) issues about the harvesting of trees over 20 inches DBH, (3) the design and implementation of skips and gaps, (4) treatment of groupings of large trees, (5) road construction, and (6) riparian treatments. About 50 people attended the field trip and another 20 or so attended the evening presentation. In the evening, Drs. Franklin and Johnson further explained the meaning of ecological forestry, and its scientific underpinnings as it relates to the Middle Applegate Pilot.

Based on the field visit (May 23) and the evening presentation, I heard that the professors were satisfied with the outcome of Pilot Joe thus far, and that the design of the Pilot Thompson appears to meet the intent of their ecological forestry principles. Franklin and Johnson stated:

- Ecological forestry considers the cultural, environmental and social needs using the natural forest ecosystem as the model for understanding the disturbance and development processes. Ecological

forestry seeks to reduce risks for major disruptions to the forest processes, valuing complexity, heterogeneity, and planning of treatments at the landscape level.

- Their ecological forestry principles are well grounded in the vast nation-wide knowledge of frequent fire ecosystems.
- The stand history study undertaken by Oregon State University in 2011, and nearly completed for publication, underscored the belief that the Middle Applegate Watershed is a frequent fire ecosystem.
- There is no basis for applying a 20 inch diameter cap, though there are stand conditions where the application of the principles simply results in no trees over 20 inches DBH being designated for harvest. To achieve density goals and to reduce competition, some larger trees may need to be cut. It is important to consider where the larger tree sits on the landscape and what the specific scenario is, rather than to impose a certain diameter limit.
- Some additional access (i.e. new roads) may be necessary to achieve ecological forestry principles.
- Treatment in specific classes of Riparian Reserves may be necessary to achieve ecological forestry principles.
- Except for some ponderosa pines that were not marked for retention, the professors agreed that the silvicultural prescription for Unit 19-4 is appropriate. They did also share that they believed the central portion of the unit did not seem to have density issues, therefore, they would retain all the really large trees (e.g. >30 inches DBH) in that portion of the unit, even if they were competing with a ponderosa pine.
- Trees at 150 years old are not old growth, but are at an age where characteristics of old growth begin to develop.
- Skips may consist of the various vegetative conditions such as meadows, hardwood patches, and other unique places in the stand, in addition to groups of larger trees, and dense patches of conifers.
- Skyline corridors should not be counted as gaps.
- Improvements to the Pilots were also noted.
 - 1) The BLM should pay special attention to the reasons for designating trees larger than 28 inches diameter for harvest. The harvest of such trees should not be routine and without thought.
 - 2) In Douglas-fir dominated stands the prescription should more strongly reflect the need to retain all ponderosa pine.
 - 3) Hardwoods are very important and an effort to minimize damage during logging operations is important, as is the removal of competing conifer trees around important hardwoods.
 - 4) The discussion and importance of “restoration” overshadowed the other important objective of ecological forestry which is to provide a sustainable supply of timber.
 - 5) The accounting of skips and gaps should not be formulaic, but dependent on stand conditions that allows the development and/or retention of heterogeneity.

Roads

Due to the high level of interest in roads, both to increase and decrease them, a multi-party transportation working group comprised of members from BLM, industry, local environmental organizations, our collaborative partners, and the Thompson Creek community, was established. The BLM established the working group in an effort to increase the transparency in road management decisions for the Pilot and to seek community ownership in the transportation system by providing a collaborative opportunity to assess the transportation system needs in the Pilot Thompson planning area.

The net result was the group identifying seven miles of road to remove (although two miles of which are simply carrying through with the paper exercise of removing them from the transportation system), a need to construct a mile of road, and the opportunity to restore unauthorized OHV trails and also provide for hiking and equestrian trails.

Within the Pilot Thompson REA, both action alternatives include the opportunity to decommission roads that are causing resource damage and have been determined to be no longer needed. Under the BLM timber sale contract, there is a narrowly defined authority for decommissioning/removing/obliterating roads through the activity of a timber sale. The REA identified 2.55 miles of roads that would be removed from the system under a timber sale contract. The remaining, approximate 2.5 miles of roads identified to be decommissioned, may be done when restoration/road decommissioning funds become available. On average over the last five years, the Ashland Resource Area has been decommissioning about 0.8 miles of road under timber sale contracts, and about 1.3 miles of road annually under projects other than timber sales. In the same five years, the Ashland Resource Area has built about 0.8 miles of permanent roads annually under its timber sale program. This leaves a net reduction of just over 1 mile of road annually.

The alternatives explored the tradeoffs between building 0.37 miles of new *permanent* road and not building any, at all. In fact, Alternative 3 constructs zero miles of permanent OR temporary roads, considering harvesting timber from the existing transportation system only. In making the decision on which, if any, new permanent roads to construct, I considered both the urgency and/or importance to access and treat a stand and whether there were viable near-term options for access, as well as the location of the proposed roads and the estimated effects (i.e. short ridge-top roads with low potential for adverse effects versus mid-slope road with steep slopes and higher risk for road related effects). I am recognizing that the price of logs has gone up substantially to where helicopter yarding may be becoming feasible. Therefore, I did not wish to build a permanent new road simply to provide cable access for a unit where a potentially viable option is yarding via helicopter. Therefore, at this time, I have decided not to build the 39-4-6.1 road that would be used to access Unit 6-1 under Alternative 2. Also, due to economics, Unit 25-1 was dropped from the timber sale; therefore, the 39-5-25.5 road will not be needed.

Large Trees

Comments reflected a desire to retain large trees. Some commenters defined large trees as over 20 inches DBH; others as 30 inches DBH or greater; still others simply stated “large” trees. Commenters supported their preferences for retaining large trees in the various texts from Drs. Franklin and Johnson describing their restoration principles. Commenters also noted that large trees are more fire resilient than smaller ones. While stating a preference for retaining all trees over 150 years of age, Drs. Franklin and Johnson purposefully did not include a diameter limit in their implementation guidance.

The focus on Pilot Thompson is not the harvest of large trees. Based on timber sale cruise data for the 2013 Pilot Thompson timber sale, about 89.4 percent (6,467 trees) of the total number of trees marked are 20 inches DBH or smaller, 10.4 percent (751 trees) are 20.1 inches to 29.9 inches, and 0.2 percent (12 trees) are 30 inches diameter or larger. This range of harvest across diameters is consistent with more than a decade worth of monitoring the sizes of trees cut in timber sales. The focus on the Ashland Resource Area has and continues to be on trees with diameters less than 30 inches diameter.

Based on high quality recent satellite imagery, the BLM calculated there to be 3.5 million trees over 30 inches DBH on the Medford District. Tree tallies in leave-tree marked units in Pilot Thompson indicate there are 5.5 trees per acre over 30 inches DBH. A tree 30 inches DBH or greater, even in the Applegate, is not rare. Based on data from the Middle Applegate stand history study, trees over 150 years old ranged from 17-50 inches in diameter. The oldest tree sampled was a 344 year old ponderosa pine with a 38.6 inch DBH. The oldest Douglas-fir was 292 years old and 25.5 inches DBH.

Riparian Reserves

To increase the effectiveness of ecological forestry as a “landscape” level influence, Franklin and Johnson do not believe that Riparian Reserves should be an artificial boundary that excludes application of their ecological forestry principles. However, this is not a blanket desire to completely ignore the riparian land allocation and its standards and guidelines, but a desire to more completely treat the landscape with ecological forestry principles. They have provided guidance to focus riparian treatments where the risk to degrading riparian function is sharply reduced. Furthermore, they have also retained the guidance for no treatment buffers consistent with the stream’s classification.

As Riparian Reserves have had very little, if any, past timber harvest, some overstocked conditions persist there. As demonstrated in the REA, tree growth in overstocked stands is very minimal. Providing for tree growth in otherwise slow growing stands results in eventual large, dead wood in the Riparian Reserves and is very beneficial to the Riparian Reserve. Therefore, I evaluated options to demonstrate a range of conservative possibilities for managing Riparian Reserves using ecological forestry principles.

Although **no** Riparian Reserve treatments are included in the upcoming Pilot Thompson timber sale, it is my intention to demonstrate the extension of ecological forestry principles in Riparian Reserves at a later date as part of a separate small timber sale or stewardship contract.

I would like to note that the restoration of live streams is a very important consideration. BLM is partnering with the Rogue River Siskiyou National Forest and the Applegate Partnership and Watershed Council (and numerous land owners) to create wood structures in more than two miles of streams through private lands in Thompson Creek to enhance the anadromous fish habitat. BLM will be providing wood for this project from the Pilot Thompson project area.

Lessons from Pilot Joe

In Pilot Joe, the 1st phase of the Middle Applegate Watershed Pilot, most skips were designated only by a boundary and an outer ring of reserve trees. In order to avoid any mistakes related to the skips, we will more distinctly designate and document the skips and especially reserve mark the larger trees within skips.

We will be more detailed in the prescriptions and marking guidelines to give the implementation crew better understanding of the desired outcome. The prescriptions will also include more discussion of stand and group conditions that warrant extra attention. The results of field reviews of both Pilot Joe and Pilot Thompson have shown there are some situations on the landscape that are worth acknowledging and providing detailed direction for potential treatment.

Now that Pilot Joe has been implemented, we are able to visualize and evaluate the outcomes, and note where improvements can be made. This is the classic adaptive management approach at work (i.e. “do it, review it, do it better”). In order to provide adequate review of the mark in Pilot Thompson and to incorporate lessons learned from Pilot Joe, the planning process was extended and additional review time was given to community members and interested parties.

MONITORING

Immediate post-treatment implementation monitoring will be used to assess progress towards established goals, including whether proposed restoration principles were implemented as planned. In addition to ecological goals, appropriate economic and social goals will be defined and monitored.

Much of implementation monitoring is accomplished in the day to day work by BLM employees. Project supervisors, contract inspectors, and timber sale administrators review the work being done and assure compliance with the regulations and stipulations in the applicable administrative documents. The majority of actions described under the alternatives are implemented through a timber sale, service, or stewardship contract. In the case of contracts, implementation monitoring is accomplished through BLM's contract administration process. PDFs included in the project description are carried forward into contracts as required contract specifications. BLM contract administrators and inspectors monitor the daily operations of contractors to ensure that contract specifications are implemented as designed. If work is not being implemented according to contract specifications, contractors are ordered to correct any deficiencies. If unacceptable work continues, suspension of contracts and/or monetary penalties can be applied.

Within three years of implementation, effectiveness monitoring will be used to evaluate success and trends related to the implementation of restoration principles, including the degree to which desired outcomes are being achieved. Effectiveness monitoring will consider not only forest restoration goals, but also will address sustainability, social and economic goals. Summary findings from effectiveness monitoring will include recommendations on how learning can be shared with communities and incorporated into future restoration planning and implementation (adaptive management). All effectiveness monitoring is funding dependent. The BLM and our collaborative partners are continually seeking ways to fund this important component of adaptive management.

I wish to clarify the monitoring role of the Multi-party Monitoring Team and how the monitoring effort by the community was used in my decision.

As a result of the Multi-party Monitoring Team placing their data plots in Pilot Joe, they uncovered a handful of questionable trees to be harvested (two trees over 180 years of age--the age at which BLM acknowledges the trees to be old growth--were subsequently cut). I determined that the trees cut were not consistent with the prescription, but also noted that this was an isolated incident. A follow-up report on this incident is available on the Pilot website at <http://www.blm.gov/or/districts/medford/forestry/pilot/pilot-projects.php>.

To respond to community concerns about BLM's ability to apply quality control, additional time was given for interested community members to review the Pilot Thompson mark. This opportunity was intended to provide another level of validation that trees older than 150 years have not marked for harvest. I also made several field trips with BLM staff to review and improve the mark and its accountability. In addition, the EA comment period was extended by 31 days. As a result of those two actions, I do not expect a similar issue with Pilot Thompson.

The Multi-party Monitoring Team presented the monitoring scheme at a public meeting on April 15, 2013. The team has established plots in the Pilot Joe project area and is in the process of establishing plots in Pilot Thompson. Monitoring needs and goals were identified via a public workshop attended by over 40 interested community members. Monitoring questions of the Multi-party Monitoring effort include:

- Did the project increase forest ecosystem resistance and resilience?
- Did the project increase spatial heterogeneity at the stand and landscape scale?
- Did the project conserve and improve northern spotted owl habitat?
- Did the project generate jobs and support regional manufacturing infrastructure?

- Did the project gain public support for active management of federal forests?

The community also established an independent grass roots monitoring effort in response to the old growth trees cut in Pilot Joe. The community monitoring field work began before all of the units were finalized. Consequently, some of the early conclusions assembled for the initial monitoring report were in error. Old marking paint from a previous project that was not implemented added to the confusion, as did a lack of understanding on the difference between a yellow and blue marked tree (i.e. leave tree vs. cut tree). Despite some mischaracterizations in the initial community monitoring report, the BLM reviewed all of the community's areas of concern in the field and made changes in response to the community and/or validated that the mark was consistent with the marking guidelines (REA, Appendix A). The net result was the additional retention of perhaps a half dozen large trees.

In their paper titled "*Applying Restoration Principles on the BLM O&C Forests in Southwest Oregon*" (2009), Franklin and Johnson state the desire to retain trees over 150 years old is based on an age where trees in Dry Forests begin to exhibit characteristics of old trees, and that fire exclusion began about 150 years ago influencing the numbers of trees that resulted less than 150 years old. Franklin and Johnson also explain in their 2012 Journal of Forestry article titled "*A Restoration Framework of Federal Forests in the Pacific Northwest*" that "stakeholders and agency personnel must agree on some allowance for errors in age estimation." Nonetheless, Franklin and Johnson also believe "additional levels of calibration and review will undoubtedly be needed during implementation."

The BLM used the marking guidelines described in Appendix A of the REA to focus on increasing the certainty that 150 year-old plus trees are not marked for harvest. Nonetheless, community members remained concerned that trees older than 150 years were being cut. To address the desire for "additional levels of calibration" implementation monitoring was conducted to determine how well markers achieved the age-based criteria in commercial harvest units. Any trees determined to be 150 years or older were reserved from harvesting.

Forty-eight (48) trees 26.1 inches DBH and larger and designated for harvest were bored to determine tree breast height age. Of these trees, eight were determined to be 150 years or older and were reserved from harvesting. Based on data collected, markers achieved the age based criteria for an estimated 83 percent of the trees bored larger than 26.1 inches DBH. Over the project, these eight trees represent <0.2 percent of trees marked in commercial units of the Pilot Thompson project. An additional 14 trees under 26.1 inches diameter were bored for age; all were under 150 years of age.

Because our implementation shows a very high degree of compliance with the goal to retain trees over 150 years of age, I do not believe that a community suggested 20-inch or 30-inch diameter cap is necessary. In fact, tree data from the Middle Applegate stand history study by the University of Oregon (ongoing and unpublished to date) shows it is very difficult to correlate age and diameter. Therefore, a diameter cap is not useful in increasing the precision in determining whether trees are 150 years or older.

CONSULTATION AND COORDINATION

Pursuant to the Endangered Species Act (ESA), formal consultation was completed with the US Fish and Wildlife Service. The Service concluded in its Biological Opinion (Tails #: 01EOFW00-2013-F-0091) that the District's proposed activity was found to be likely to adversely affect northern spotted owls, but not likely to jeopardize the continued existence of the spotted owl (REA p. 3-106). Portions of the Pilot Thompson Project are within 2012 critical habitat sub-unit KLV-4 as determined by the US Fish and Wildlife Service.

A no effect determination was made by the BLM regarding federally-listed aquatic species, specifically Southern Oregon Northern California Coastal (SONCC) coho, their Critical Habitat, or Essential Fish Habitat (REA p. 3-86; Appendix B, p. B-2).

A no effect determination was made by the BLM regarding federally-listed plant species. Portions of the Pilot Thompson project area (596 acres within proposed non-commercial units) are within the range of the plant species *Fritillaria gentneri*, a species listed under the Endangered Species Act. Two years of surveys are required for larger scale projects within suitable *Fritillaria gentneri* habitat, or one year of surveys may be completed in concurrence with formal consultation with the US Fish and Wildlife Service. Only one year of surveys has been completed in the Pilot Thompson project area, therefore, formal consultation is underway. However, as this decision record will not authorize treatments in any suitable habitat, consultation does not need to be completed prior to this decision.

In accordance with the Protocol for Managing Cultural Resources on Lands Administered by the Bureau of Land Management (BLM) in Oregon, and the National Historic Preservation Act of 1966 (specifically section 106), as amended, a literature review and archaeological reconnaissance was conducted for the Pilot Thompson project area. The project will not adversely impact any sites of cultural or historical significance. The State Historic Preservation Office (SHPO) was informed of the BLM's finding in accordance with 36 CFR 800.5(b) (REA, p. 3-146).

Letters were sent on October 2, 2012 to the following Federally Recognized Tribes: the Confederated Tribes of Siletz Indians of Oregon, the Cow Creek Band of Umpqua Tribe of Indians, and the Confederated Tribes of the Grand Ronde Community of Oregon.

Also notified were the following City, County, State and Federal groups: the Association of O&C Counties, the Bureau of Reclamation, the Department of Environmental Quality, the Department of State Forestry, Jackson County Soil and Water Conservation District, Jackson County Commissioners and Courthouse, Jackson County Stockman's Association, Medford Irrigation District, National Marine Fisheries Service, Oregon Department of Environmental Quality, Oregon Department of Fish and Wildlife, and the Rogue River-Siskiyou National Forest.

PUBLIC INVOLVEMENT

Collaboration has played a large role in the Pilot process. The Medford District has participated in long-term efforts with the Applegate Partnership and the Southern Oregon Forest Restoration Collaborative to increase public support for forest projects that are socially acceptable, ecologically appropriate and economically viable. Those community groups, as well as other interested stakeholders, have had substantial participation in the Pilot process. Numerous public meetings, workshops and field trips have occurred as part of the planning process to inform interested stakeholders and the public about the Pilot, its goals, and its foundational principles.

To date, the Pilot Thompson planning process has:

- Included two scoping periods where we have provided opportunities for the public to comment on the project (September 2011 and April 2012);
- Published a Final Scoping Report summarizing the issues identified during both scoping periods in August 2012;
- Co-hosted six field trips (November 2011, September and October 2012, March, April, and May 2013);
- Co-hosted four public meetings (October 2011, February 2012, February and May 2013);
- Participated in 2 neighborhood meetings in the Thompson Creek area (April and May 2012);
- Sent an update letter to interested parties that outlined the preliminary proposed action alternatives prior to the EA being published (November 2012).

- Posted all planning documents, including interdisciplinary (ID) team meeting notes, public comment letters, maps, and field trip and public meeting information to the Pilot website in a timely manner; and
- Invited three members of the public to participate on the ID Team.

PLAN CONFORMANCE

Resource Management Plan

The Pilot Thompson Project is designed to be in conformance with the *1995 Medford District Record of Decision and Resource Management Plan (RMP)*. The 1995 Medford District Resource Management Plan incorporated the *Record of Decision for Amendments to Forest Service and Bureau of Land Management Planning Documents Within the Range of the Northern Spotted Owl and the Standards and Guidelines for Management of Habitat for Late-Successional and Old-Growth Forest Related Species Within the Range of the Northern Spotted Owl (Northwest Forest Plan) (USDA and USDI 1994)*.

The Pilot Thompson Project contains Project Design Features that apply Best Management Practices (BMPs) in Appendix D of the 1995 RMP (as modified by IM-OR-2011-074). As designed, this project complies with Management Direction, Objectives, and Best Management Practices of the 1995 Medford District RMP.

Survey and Manage

The Pilot Thompson Project is consistent with the 2001 *Record of Decision and Standards and Guidelines for Amendments to the Survey and Manage, Protection Buffer, and other Mitigation Measures Standards and Guidelines (2001 ROD)*, as incorporated into the Medford District Resource Management Plan.

On December 17, 2009, the U.S. District Court for the Western District of Washington issued an order in *Conservation Northwest, et al. v. Sherman, et al.*, No. 08-1067-JCC (W.D. Wash.) (Coughenour, J.), granting Plaintiffs' motion for partial summary judgment and finding a variety of NEPA violations in the *Final Supplemental to the 2004 Supplemental Environmental Impact Statement to Remove or Modify the Survey and Manage Mitigation Measure Standards and Guidelines (USDA and USDI 2007)*. In response, parties entered into settlement negotiations in April 2010, and the Court filed approval of the resulting Settlement Agreement on July 6, 2011.

The Ninth Circuit Court of Appeals issued an opinion on April 25, 2013, that reversed the District Court for the Western District of Washington's approval of the 2011 Survey and Manage Settlement Agreement. The case is now remanded back to the District Court for further proceedings. This means that the December 17, 2009, District Court order which found NEPA inadequacies in the 2007 analysis and record of decision removing Survey and Manage is still valid.

Previously, in 2006, the District Court (Judge Pechman) had invalidated the agencies 2004 RODs eliminating Survey and Manage due to NEPA violations. Following the District Court's 2006 ruling, parties to the litigation had entered into a stipulation exempting certain categories of activities from Survey and Manage standard (hereinafter "Pechman exemptions").

Judge Pechman's Order from October 11, 2006 directs: "Defendants shall not authorize, allow, or permit to continue any logging or other ground-disturbing activities on project to which the 2004 ROD applied unless such activities are in compliance with the 2001 ROD (as the 2001 ROD was amended or modified as of March 21, 2004), except that this order will not apply to:

- A. Thinning projects in stands younger than 80 years old (emphasis added);

- B. Replacing culverts on roads that are in use and part of the road system, and removing culverts if the road is temporary or to be decommissioned;
- C. Riparian and stream improvement projects where the riparian work is riparian planting, obtaining material for placing in-stream, and road or trail decommissioning; and where the stream improvement work is the placement of large wood, channel and floodplain reconstruction, or removal of channel diversions; and
- D. The portions of projects involving hazardous fuel treatments where prescribed fire is applied. Any portion of a hazardous fuel treatment project involving commercial logging will remain subject to the survey and management requirements except for thinning of stands younger than 80 years old under subparagraph a. of this paragraph.”

Following the District Court’s December 17, 2009 ruling, the Pechman exemptions still remained in place. The Pilot Thompson Project meets the provisions of the last Record of Decision, specifically the 2001 Record of Decision and Standards and Guidelines for Amendments to the Survey and Manage, Protection Buffer, and other Mitigation Measures Standards and Guidelines (not including subsequent Annual Species Reviews). Proposed non-commercial treatment units would conduct hazardous fuels treatments where prescribed fire is applied without commercial logging, The non-commercial portion of the project meets Exemption D of the Pechman Exemptions (October 11, 2006 Order). Proposed road decommissioning activities are covered under Exemption B & C.

Revised Recovery Plan

In June 2011, the USFWS (U.S. Fish and Wildlife Service) finalized the *Revised Recovery Plan for the Northern Spotted Owl*, which contains 33 Recovery Actions. Recovery Actions are recommendations to guide activities needed to accomplish the recovery objectives and ultimately lead to delisting of the species. Specifically, Recovery Action 32 (RA 32) in the Recovery Plan recommends “maintaining and restoring the older and more structurally complex multilayered conifer forests” (U.S. Fish and Wildlife Service 2011, III-67). The intent of RA 32 is to maintain substantially all of the older and more structurally complex multi-layered conifer forests on federal lands in order not to further exacerbate the competitive interactions between spotted owls and barred owls. The Pilot Thompson Project defers proposed treatment in RA 32 stands identified by interagency survey guidance (USDA and USDI 2010) and is consistent with consultation completed with the U.S. Fish and Wildlife Service (USFWS), (USFWS 2011b and USFWS 2012b).

Special Status Species

The Pilot Thompson Project is consistent with BLM Manual 6840 (USDI 2008), the purpose of which is to provide policy and guidance for the conservation of BLM special status species and the ecosystems upon which they depend on BLM-administered lands. BLM special status species include those species listed or proposed for listing under the Endangered Species Act (ESA), as well as those designated as Bureau sensitive by the State Director(s). The objectives of the BLM special status policy are:

To conserve and/or recover ESA-listed species and the ecosystems on which they depend so that ESA protections are no longer needed for these species; and

To initiate proactive conservation¹ measures that reduces or eliminates threats to Bureau sensitive species to minimize the likelihood of and need for listing of these species under the ESA (USDI 2008: section 0.02).

¹ Conservation: as applied to Bureau sensitive species, is the use of programs, plans, and management practices to reduce or eliminate threats affecting the status of the species, or improve the condition of the species’ habitat on BLM-administered lands (USDI 2008, Glossary p. 2).

This decision is also in conformance with the direction given for the management of public lands in the Medford District by the Oregon and California Lands Act of 1937 (O&C Act), Federal Land Policy and Management Act of 1976 (FLPMA), the National Environmental Policy Act of 1969 (NEPA), the Endangered Species Act (ESA) of 1973, the Clean Water Act of 1987, Safe Drinking Water Act of 1974 (as amended 1986 and 1996), Clean Air Act of 1990, the National Historic Preservation Act of 1966 as amended, and the Archaeological Resources Protection Act of 1979.

ADMINISTRATIVE REMEDIES

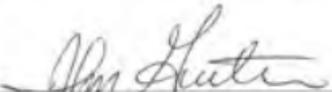
This decision is a Forest Management Decision. Administrative remedies are available to persons who believe that they will be adversely affected by this decision. A protest may be filed within 15 days of the publication of a Notice of Decision or Notice of Sale in Medford's *Mail Tribune* newspaper.

When timber is offered for sale, a Notice of Sale will be published in the Medford Mail Tribune. Publication of the first notice of sale establishes the effective date of the decision for those portions of this Decision Record to be implemented through a timber sale. The protest of the timber sale must be made within 15 days of the publication of the Notice of Sale.

In accordance with the BLM Forest Management Regulations 43 CFR §5003.2 (a & c), the effective date of this decision, as it pertains to actions which are *not* part of an advertised timber sale is the date of publication of a Notice of Decision in The Medford Mail Tribune. Any protest must be made within 15 days of the publication of Notice of Decision in the Mail Tribune. Any contest of this decision should state specifically which portion or element of the decision is being protested and cite the applicable regulations.

43 CFR § 5003.3 subsection (b) states: "Protests shall be filed with the authorized officer and shall contain a written statement of reasons for protesting the decision." This precludes the acceptance of electronic mail (email) or facsimile (fax) protests. Only written and signed hard copies of protests delivered to the Medford District Office will be accepted. The Medford District Office is located at 3040 Biddle Road, Medford, Oregon.

If no protest is received by the close of business (4:30 p.m.) within 15 days after publication of the Notice of Decision or Notice of Sale, the decision will become final. If a timely protest is received, the project decision will be reconsidered in light of the statement of reasons for the protest and other pertinent information available, and the Ashland Resource Area will issue a protest decision.


John Gottisima
Field Manager, Ashland Resource Area
Medford District, Bureau of Land Management

8-6-13
Date