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## Pilot Thompson

Threatened & Endangered Little Applegate Valley <telav@deepwild.org>

Thu, Apr 25, 2013 at 3:58 PM

To: skellehe@blm.gov

Hello Stephanie,

On behalf of TELAV I wish to register our comments on the Pilot Thompson project. Since this is a pilot project, how Pilot Thompson works out will impact the future of BLM lands in the Little Applegate and upper Applegate watersheds among others.

I have extensive personal experience working with BLM in many capacities including as contract botanist & forester, project critiques, and coordinating a joint research project with BLM, SOU, & Headwaters through a forestry course in measurement I taught at SOU on 1991-2. I also have worked as a USFS employee in engineering and wildlife, & as a USFS contractor in wildlife, botany & forestry. I began my federal career as a geologist with USGS in 1971. All these experiences with our forests and the soils they grow from has given me a unique insight into the issues surrounding natural resource management on federal lands. I appreciate the opportunity to comment on Pilot Thompson.

A few years ago, some of us from ANN & TELAV worked with the Ashland Resource Area staff to re-work the design of part of the Bald Lick TS to see if it would both be more attractive to potential bidders (at two previous auctions it drew no bids) & would be relatively benign in its environmental impacts so as not to draw any appeals from the conservation community. After speaking at length with folks in the timber industry, particularly the timber procurement officers for some local mills, we gained a clear picture of what criteria of a timber sale attract or discourage bids.

We found out that many potential purchasers shy away from helicopter sales because they entail so much higher financial risk, especially for outfits that have no helicopters & must contract with those that do. Potential purchasers also focused on sales with significant road packages (both new construction & reconstruction) as another project element that significantly increases the financial risk involved. Potential purchasers also shy away from sales that are controversial to the degree that the projects might be tied up in appeals (& even worse, litigation), which impacts the scheduling of projects for a purchaser in addition to tying up their deposit funds. There were other issues mentioned as well. We all succeeded in taking a helicopter sale that also had a large road package & making it a land-based project with only 0.1 mile of temporary road construction. This project sold for nearly 3 times the appraised value & drew no appeals!

With our Bald Lick experience to draw upon we advise:

- Eliminate the helicopter units for the reasons mentioned above. Additionally the EA indicates that Alt. 3 has 611 acres of NRF habitat with 214 acres downgraded to dispersal. This alternative would be much more likely to draw PAL (protest, appeal, litigation) than Alt. 2, which calls for much less downgrading of NRF habitat. Alt 2 retains far more large trees essential for such habitat and for maintaining the resiliency of the stands by retaining more canopy closure, which in turn keeps the stand moist longer & less likely to burn hot due to increased fine fuels (shrubs that grow more when more sunlight penetrated the stand) & due to increased wind penetration.
- Speaking of larger trees, BLM needs to follow many other forest units and adopt an upper diameter limit on the trees marked to harvest, somewhere around the mean diameter of stems in the stands. For Upper Thompson, this would likely be around 20".
- New road construction should also be eliminated, as well as reconstruction of old logging road that have largely revegetated, both for reasons given by potential purchasers, and for ecological reasons such as erosion and

introduction of alien species. Doing botany contract for BLM, I became very familiar with the road-runner aliens that come in with road construction. It is much easier to prevent the problem of invasive aliens than try to fight them once they've been introduced through logging road construction. The road packages also seem to invite OHV abuse into the newly accessible areas, another problem easier to prevent than to stop once it is established.

- Drop Unit 19.4, which looks like it's in good shape & not in need of thinning (especially the canopy thinning that the park prescribes) after a fire 25 years ago cleaned the stand nicely.

- Drop Unit 20-1 due to many large canopy trees marked & the new cat road proposed that would impact an increasingly rare ecosystem in our forests: oak woodland with native grass community for an understory. The other logging road reconstruction is excessive in its impacts.

I applaud the decision to re-mark UNIT 34-1A to retain more large canopy trees.

Thanks, Bethany for your time.

Chant Thomas, Director  
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*"Protecting forests, water, and wildlands in the  
Little Applegate Valley since 1979."*