

## Pilot Thompson EA Comment

The three purpose's of the Pilot are (from the EA page 1-4)

- 1) demonstrate the application of ecosystem restoration principles of Norm and Jerry
- 2) provide commercially viable timber sales that provide jobs in local communities
- 3) gauge the degree to which active forest management, has a broader base of social acceptance than traditional management practices

Pilot Thompson as implemented does not and will not fulfill any of these.

### Social Acceptance:

The BLM often lists the Applegate Partnership and Watershed Council, KS wild, and the Forest Restoration Collaborative as proxies for the "public." None of these groups represent the Applegate society. The APWC represents its board of ~10, most of whom are completely uninvolved. Jask Shipley is the prominent voice, and does not represent anyone but himself. KS Wild is a special interest environmental group. The FRC is a special interest group who's involvement in the pilot and the monitoring group is funded by the BLM. The opening of the purpose and need doesn't even list the public, I guess they are "others."

Planning field trips on weekdays prevents the majority of the population from attending and being involved.

Learning Conversations have been done for Pilot Joe with industry and BLM staff, but the public has not been engaged.

The same week as the EA release meeting, John Gerritsma penned an article in the Applegate newspaper, personally attacking dedicated collaborative community members. The community members had indicated the harvesting of multiple trees over 180 years old (old growth) was inconsistent with the principles of the pilot and needed to be addressed. These community members where accused by John Gerritsma of having "ulterior motives." He also stated "the rest of us will continue to strive toward a meaningful community involvement." At the same time the BLM was asking for constructive comments, it was attacking any community member with constructive comments. In addition John Gerritsma was making a public example of how he and the BLM would react to any disagreement within the ranks of the "community," with personal attacks in a public forum.

Attempting to intimidate the community into silence or agreement does not gauge social acceptance of anything. The fact that the Decision Maker himself penned the letter clearly calls into question the appropriateness of his position. It is also clear that many community members HAVE BEEN silenced in fear of public attack or

retribution from John Gerritsma, destroying any attempt at engaging the public or gauging their support.

In the EA the BLM does not identify HOW they are gauging the base of social acceptance. Failing to perform learning conversations with the public, mid-week field trips and personal attacks on community members who do comment doesn't fulfill the third part of the purpose.

Provide Jobs in Local Communities:

In Pilot Joe no member of the commercial harvesting crew was from the Applegate Valley, nor where any of them from Jackson county. No mill operates in the local communities of the Applegate. The mills in the rogue valley will see some work, however the BLM has not analyzed the paucity amount of work provided to them by these sales. In addition, only trees under 20" can be processed in Jackson and Josephine county, so all trees over that size will not contribute in any way to jobs in either county. No where in the EA has the BLM analyzed or assessed how many "jobs in local communities" will be provided. The second purpose in the EA has not and will not be met.

Demonstrate Restoration Principles:

Many of the basic principles of Norm and Jerry while stated in the EA are not actually implemented on the ground.

The first principle of stand-level ecological restoration (from 1-5 of the EA) "retention of older(>150yo) trees." The community identified multiple trees within the timber sale that appeared to be >150yo. To disprove this, the BLM is undertaking a coring project. The first trees cored were in fact over 150yo, they were marked for retention. John Gerritsma stated that, moving forward with the project, trees older than 150yo will not be retained, even if they are cored older than that. For the BLM to continue the harvest of trees over 150yo even after gathering proof of their age is a clear violation of the principle and a failure to fulfill the purpose. It also clearly illustrates the BLM's and John Gerritsma's willingness to perform operations on the ground that are in direct conflict with the principles of the pilot, and their stated actions in the EA, which I believe is breaking the law. If the BLM willfully "cores and cuts" trees over 150yo, which in the EA they state they will not do, any supposed analysis is deeply flawed.

In the EA, the primary objective of the silvicultural objectives is "conserve and improve survivability of older trees (greater than 150yo)" So again by "coring and cutting" trees over 150yo, the BLM is implementing something very different on the ground than what is stated and analyzed in the EA.

If the basic principles of the project are not implemented and exhibited, a demonstration has not been performed. That is what a demonstration is.

The second principle is “provision of skips where no thinning is done to provide hiding cover and heavily shaded habitat niches.” Throughout the Pilot areas of very low density and even clearings are selected as skips. In some units small oak woodlands along the top of the ridge have been selected as a skip. This does not demonstrate the principles as stated in the EA. When the BLM interprets areas with no commercial timber as “providing hiding cover or shaded habitat” there is a clear problem. In addition other skips contain many large legacy trees surrounding a grassy opening in the woods. Again, this is not consistent with the principles of the EA. The point of skips is to exclude an area that would have normally been harvested, not exclude an area with no commercial timber and little cover so you can justify “gapping” a timbered area. This is inconsistent with the principles of Norm and Jerry and a failure to demonstrate them.

The silvicultural objectives state as an objective “contribute to fulfilling the intent of the ESA by conserving ecosystems which species depend.” Alternative 3 downgrades 378 acres of NRF habitat for the NSO. That is 24% of the total commercial units. Downgrading 24% of the ecosystem, which an ESA species depends on, does not contribute to fulfilling this intent. Further the USFWS has determined that the harvest of unit 19-4, in either alternative, is Likely to Adversely Affect the NSO. Adversely affecting NSO is another failure fulfilling the objectives of the pilot. Again what the BLM has stated in its EA is not what is actually going to occur on the ground.

How does the BLM equate degrading the habitat of 24% of the timber units and Adversely Affecting NSO as “contributing to the fulfilling of the intent of the ESA?”

The Pilot Thompson timber sale fails to fulfill any of its three purposes.

The analysis in the EA is incorrect and incomplete because the BLM staff has failed to implement the principles of Norm and Jerry on the ground. This is do in part to a complete lack of implementation monitoring. In pilot joe the implementation monitoring performed by the silviculturalist and the sale administrator failed to prevent the harvest of many trees over 150yo and multiple trees over 180, the BLM’s definition of “Old Growth.” In response to this the BLM has verbally stated that they are performing much stricter implementation monitoring in Pilot Thompson. Not only is this monitoring not outlined in the EA, it clearly has not been performed on the ground. As evidence of this I offer the fact that the BLM has unmarked many trees in multiple units that the community monitoring group has brought to their attention. These trees have not only been inconsistent with the marking guidelines and restoration principles, but have also included trees over the 150yo age limit. The community monitoring group has very limited volunteer time

and can not monitor all units. Considering only a few units have been cruised by the community, and problems have been found in many, it stands to reason that many other units which the community has not visited also have inconsistencies.

How untrained unpaid community members can perform better implementation monitoring than the trained and paid staff of the BLM is an important question that needs to be answered. In addition the credentials of the BLM staff and contractors needs to be reanalyzed.

It is clear that the BLM can not or will not monitor the implementation of the project as outlined in the EA, and so no approval can be made of the analysis, as it is a flawed misrepresentation of the timber sale as marked.

To help quantify just how incorrect and inconsistent the BLM's analysis is, lets look at the timber cruise for pilot joe. The BLM stated there was 1.5million bdf, in actuality there was 2million bdf, a full 33% more than initially recorded. Luckily this was a scaled sale, otherwise the industry would have gotten away with 25% of the gross value. So if we extrapolate this across the EA that means any of the baseline figures or basal area figures recorded by the BLM staff for their silvicultural analysis could be off by 1/3. That is certainly significant and outside any range of variability. If the basal area analysis is off by that much, it would significantly influence desired harvest targets. The BLM needs to state how they are altering their implementation monitoring in order to record correct figures for analysis in the EA. The timber companies don't need to be given 33% more than they payed for. And the BLM doesn't need to cut 33% more than they said they were going to.

The prescription for VDT is "designed to move the current condition of crowded, uniform, stands to more open conditions." John Gerritsma, Nate Goodwine, and other BLM staff have stated that much of the Pilot Thompson sale was harvested 15 years ago. Because of this harvest most of the commercial units are not "crowded" or densely treed. Many are open grown with wide open spaces between trees, not overly dense unmanaged forests. Again the basic principles and tenants of Norm and Jerry's principles are not being demonstrated on the ground. Any analysis that states otherwise is flawed. In pilot joe Norm and Jerry recommended dropping a unit which was not of the correct stand structure to demonstrate their principles. The BLM may not be paying for Norm and Jerry's opinion anymore, but I am sure many of these units also fall outside of their principles.

Units 30-2, 31-2, 33-3, 34-2, 34-3

All of these units have been recently harvested and contain well spaced large diameter trees. Many of these units have a relatively small number of harvested trees indicating they may not be an appropriate demonstration of Norm and Jerry's principles. If not much wood is coming out, they are not overstocked. 34-3 has a couple of skips that are a few legacy trees and a clearing, not an appropriate application of the principles.

#### Unit 19-4

All 36 acres of this unit will degrade NSO habitat from NRF to dispersal. This unit was also assessed by the USFWS as likely to adversely affect the NSO. Many trees in 19-4 have been identified as older than 150yo and the BLM has started a project of coring trees in this unit. John Gerritsma has indicated trees cored to be over 150yo will not be retained, even though the BLM has proven their age to be outside the principles the pilot is supposed to demonstrate.

Considering both of these factors, the planned harvest of many trees known by the BLM to be over 150yo and BLM's awareness of the adverse affects of its harvest on NSO, the BLM must drop this unit from any proposed action.

In summation, the Pilot Thompson timber sale does not demonstrate the principles of Norm and Jerry, does not provide jobs for the local community, and does not gauge the broader social acceptance of ecological forestry. Failing to fulfill any of the three purposes of the project dictates the BLM not act on this project. Once the BLM actually purposes a timber sale that fulfills the purposes listed, I would be happy to comment on the completeness of its analysis.

If John Gerritsma can actually embrace the principles of Norm and Jerry and the purpose of the Pilot projects, a very meaningful and useful demonstration can be performed, until then John is merely attempting to force a timber sale on a unsuspecting public.

A Concerned Community Member

P.S. John, please do not publically and personally attack me for having constructive criticisms. That is not a collaborative approach. Wanting the pilots to demonstrate the principles of Norm and Jerry and fulfill the purpose of the project is not an "ulterior motive" as you have publically stated.