

Stephanie Kelleher
Middle Applegate Watershed Pilot Project
Medford District BLM
3040 Biddle Road
Medford, OR 97504

April 26, 2013

Reference: 1792(ORM060) EA Comments for the Pilot Thompson Project

Dear Stephanie Kelleher,

My wife and I live on 80 acres in the Applegate with BLM lands adjacent to our property. Every direction we look we see BLM managed lands. We can now see the cable logging roads and landing sites of the Pilot Joe project located two miles south of us on the hillsides above the Applegate River. These downward facing fan shaped scars on the landscape from the cable logging are easily visible from this distance with the naked eye. One could say that from a distance it looks better than a clear-cut but it is readily apparent some major logging took place there.

I have been to the Pilot Joe and Pilot Thompson projects numerous times on my own, with other concerned citizens and on BLM field trips. Since Pilot Joe is the model for Pilot Thompson and other future projects we need to take a hard look at the successes and failures of the first project and hopefully do a better job with the second and subsequent projects. The following are my observations about the Pilot Joe project:

1. If you compare the BLM treatment areas in Pilot Joe to the fairly recent logging on private timber lands that took place between the BLM treatments then one would surmise BLM are far better stewards of the forests.
2. The remaining canopy of the commercially treated areas is quite low. These areas will be dryer, hotter, be more subject to wind blow and have a potential intense brush response. In a decade some of these logged areas will have a resurgence of growth well over a person's head. Did we just trade one fuel situation for another?
3. The current system of marking the leave trees with yellow paint leaves an undesirable effect on the remaining forest. Part of this may have been due to the previous markings done in blue for another un-sold and socially unacceptable project. Please return to the policy of marking the trees to "take", not the "leave" trees.
4. Citizens need the opportunity to harvest firewood from the piles of slash left over from a project like this. A recent visit appears some firewood has been cut but there are still many potential cords in piles easily accessible in some of the units (example: unit 1-3A). Is the public going to get access to this wood? I would like to see additional efforts to have more slash left next to the roads to accommodate the demand for firewood in our area.
5. Not enough care was taken to preserve many of the big old hardwoods. Many of these big trees had spreading canopies which makes it difficult to harvest conifers from around them. The timber fallers have no incentive to preserve these giants as they are being paid not by the hour but by how much they volume they put on the ground. A properly written contract and some due diligence by the BLM could remedy some of

these issues in Pilot Thompson. More consideration when marking might help. Financial penalties for the take or damage to the large hardwoods would also have an impact.

6. Manzanita has a place in the ecosystem and it is not appropriate to try to eliminate this tree from the forest. Not only is manzanita an integral part of the system but it is a valuable food source for many animals in the Applegate. We simply do not know enough about the symbiotic relationships between species to play God and wipe out a particular plant or tree from our forests provided it isn't an invasive species. It appears the fuels specialists target manzanita due to its tendency to burn hot so it is eliminated in the non-commercial stage of fuels treatments. I ask you to reconsider the policy to exterminate manzanita or any other species.
7. We have all seen the increased use of Off Highway Vehicles (OHVs) in areas where BLM has logged or done fuels treatments. BLM said (on a field trip) design features would be implemented on the cable yarding roads and cat roads to discourage/stop future OHV use. Yet it appears BLM forgot that promise. If a cable or cat route has any debris left to discourage OHV use it appears it was by accident not by design. It is not too late to correct this deficiency.
8. Public lands have long been a dumping ground for garbage and appliances and the roads along which Pilot Joe was implemented are no exception. And now with the treatments resulting in less vegetation this accumulated trash is highly visible. Standing on the BLM road near the last house (2022 Cantrall Road) I could count numerous large pieces of trash to include a hot water heater, visqueen, buried and bent "T" posts from an old fence, a piece of culvert, a metal box and more. I know the hot water heater has been there for over 15 years indicating BLM's trash clean-up program is inadequate or non-existent. Drive down the road a ways, get out and look over the roadside again and it is a good bet you will see more trash. Since trash pickup is not being sufficiently handled with a regular BLM program then I suggest all of the future pilots provide for trash cleanup as part of the project. A clean forest will result in less dumping. Some aggressive prosecution of violators with media attention would also help.
9. Over time I have encountered a berm placed in the middle of a BLM road to deny regular trucks and cars access beyond that point. One such berm was placed on the BLM road connecting unit 35-3NC to unit 26-1A. These berms are no obstacles to OHVs but are usually effective against the regular vehicles we normally drive. I do not intend to argue the merits of this practice. My complaint is about the placement of the berms when no consideration was put into whether a car or truck could turn around at that location. The options are to either back up a long ways or turn around at the berm with inadequate width to do so. Both options are unsafe. Signs warning a traveler of the "dead end - no turn around" or more consideration on berm placement would resolve this issue.
10. One of the primary reasons Pilot Joe was more socially acceptable was because there was no new road construction. There was some road "renovation" involving opening up naturally decommissioned roads with trees large enough to stop vehicular traffic growing in the road. Considered not as egregious as a new road, these road renovations start the erosion process all over again and open the area to the other negative effects such as OHV use, spread of noxious weeds, etc. A walk down the road renovation done on BLM road 38-4-35.3 will emphasize the new road look and feel with all fresh earth exposed on the cut and the fill.

11. It seems like there was a breakdown in a few areas of the Pilot Joe project between the plan and the implementation.
12. The accidental cutting of large conifers in the commercial operations spread mistrust throughout the process. Hopefully these “accidents” will not take place during the Pilot Thompson project as it would be unhealthy for future pilots. The policy of leaving trees over 150 years old is commendable and important for the success of these projects. But I find it difficult and tedious to count the rings on a stump (the damage is done) to verify the tree’s age whereas one can easily tell the diameter of the tree with a measuring tape. To avoid confusion and promote trust it is time to move to an upper diameter limit that is appropriate for the average tree growth in the area being marked.
13. BLM deserves praise for a number of things concerning Pilot Joe. Retaining intact LSEAs and not downgrading any spotted owl habitat is great. Allowing so much opportunity for the public to be involved is also very commendable. Conducting the fuels treatments after the commercial part is extremely important. Support for monitoring is also great. Thank you.

The following comments are directed towards the Pilot Thompson Project:

1. New road construction may be my biggest objection. Any new road construction is not acceptable in these projects. The building of new roads and “restoration” do not go together as the negative effects of roads are well known and documented. Although BLM kept the numbers of miles down in this project it still smells like so many other logging projects the public has resisted in past. If you want to have these pilots be acceptable to the public then abandon new road construction. I approve any road decommissioning but the environmental damage caused by the road being built and then the financial cost of trying to decommission it is huge.
The proposed skid trail off the end of the naturally decommissioned BLM road 38-4-20.1 is a great example of irresponsible road building. Where is the common sense?
2. Road “renovation” is my second biggest objection. The classic example is the proposed 0.79 miles of “road renovation” with the re-opening of road 38-4-20.1 to get at a unit that does not need treatment. This road is now head high in vegetation with a nice trail and evidence of a little bit of single track motorcycle use. The road has effectively been naturally decommissioned. The words “road renovation” is misleading and in the end the result is the same as a new road with all the inherent issues associated with a new road. So I see your proposed 3.30 miles of “road renovation” as 3.30 miles of new road. Add the 0.62 miles of new road proposed in Alt. 2 and you have 4 miles of “new roads” from my perspective. A partial list of the negative impacts associated with road construction would include massive soil disturbance, compaction, OHVs, dumping, non-native pathogens, water quality, spread tree diseases/beetles, noxious weeds, human caused wildfires, altered animal behavior and animal mortality. I cannot support any level of road construction.
3. I support all of the road de-commissioning you proposed. Unfortunately it is nearly impossible to keep the OHV’s off those roads once they are established. So unless you go all out and re-contour the slope much of the time you just deny regular vehicles and leave a private path for the OHV’s.
4. From my point of view, remember I look at first pilot project from my house, you took too much. In the commercial units the canopy has been opened up to where there is little

left. I am afraid this is another grand BLM experiment that is already gone awry. Cable yarding is not pretty and that is quite apparent from Hwy 238 and my house. Those fan shaped lines reminiscent of ski runs will remain with the landscape for a long, long time. A good farmer knows you do not run your plow up and down a hill or you risk significant and even catastrophic erosion. I don't profess to have the answer to cable logging in this manner but if what we see is the answer then something is not right.

5. Reduction of the canopy to such a degree is bound to elicit a vigorous brush response. There are many examples in the Applegate Valley of past BLM treated units that are now choked with 6 to 12 foot tall vegetation. Unless BLM is doing a re-entry these again fuel laden units become more of a fire hazard each year. Many of these previous treated areas look like they have as much fuel loading now as when they were done the first time. This regrowth can happen in about a decade. With no guarantee of stable funding to deal with all these "re-fueled" areas we are right back where we started from. The solution to reducing the brush response is to retain an intact canopy cover. But as this is not what Franklin and Johnson are recommending for the commercial units. These units had far more volume removed from them than what BLM had proposed when logging in the last couple of decades. Great for the timber industry but not so good for the remaining forest.
6. Many thanks go to BLM for leading the various field trips and to a few citizen volunteers who spent so much of their time and energy interpreting this project. With my own excursions and additional input I find these units should be canceled:
 - a. Unit 20-1 (as referenced in 1 and 2, above) due to the road construction, the mark and the lack of need.
 - b. Unit 19-4 has many large trees marked to take, a new road proposed at the top and it will downgrade Northern Spotted Owl (NSO) habitat.
 - c. Unit 28-2 has laid a heavy hand on the fir trees. Either drop this unit from consideration or re-mark it. Consideration for the adjacent private properties should have an influence on this project. If treated I suggest you retain more canopy.
 - d. Unit 34-1A; BLM's response to the complaints concerning the mark in this unit and the subsequent corrections are much appreciated.
7. Normally I am a fan of helicopter logging. Although aerial logging is not benign, if done properly it can have a lot less impact on the forest and can avoid the building of new roads. But this EA uses the helicopter logging to reduce dispersal habitat for the NSO.
8. We appreciate the comment period for this project was extended from 30 days to 60 days after a number of people requested an extension, me included. But it was an unnecessary dance we could have avoided. A project of this scope and importance should have 60 days of comment period from the start. It is a lot of ground to cover and a lot of paperwork to get through. And we are not paid.
9. The continued use of black visqueen to cover burn piles is irresponsible and appalling. I don't know how a responsible agency can continue to condone the burning of this poison and the polluting of our air. Would you burn a roll of black plastic next to your office on Biddle Road? Not with you windows open and not with DEQ or public approval. Not only is it burnt in the piles of brush but a lot of it gets left on the site, partially burnt or intact. What an eyesore! It is left in every fuels treatment area BLM does and it will eventually break down into the soil. If BLM would use kraft paper then not only is it less

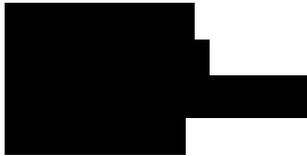
noxious for the air-shed, what does not get burnt will blend in and can break down into something environmentally acceptable.

10. My efforts to get to some of these units were made quite difficult due to the locked gates. Now an OHV can go around these gates but not my Subaru. Extra effort was made to allow me behind one of these gates by John Gerritsma and crew which I acknowledge. But denying the public the same easy access you give your crews is not right. Some allowance for the public to get behind those gates during the 60 day comment period is appropriate. Again, it is a lot of ground to cover.

IN CONCLUSION

I am concerned our desire to get some logs out of the woods is pushing BLM in another direction that may not be healthy for the areas receiving commercial treatments. The Norm and Jerry model is based on their version of historic conditions which has scientific detractors. Have no doubt, this form of logging is experimental and the driving force is not "forest restoration". But if BLM wants these pilots to continue un-impeded the social force must be reckoned with. New and renovated roads, taking of large trees of any species, a heavy cut and the taking of SO habitat are not acceptable from where I sit.

Respectfully,

A large black rectangular redaction box covering the signature area.