



Kelleher, Stephanie <skellehe@blm.gov>

Pilot Thompson official comment

Wed, Apr 24, 2013 at 10:33 PM

Reply-To: [REDACTED]

To: "Kelleher, Stephanie" <skellehe@blm.gov>

Dear BLM,

This is my official comment on Pilot Thompson. Please publish it on your website.

First and foremost, I am against any new roads within the forest. There are hundreds of thousands of miles more roads in our forests than the national highway system and these roads create a significant negative impact on the environment. Roads create erosion, impact animal migration and animal mortality, mar the beauty of the forest, and directly impact riparian zones and the water shed. Once created, the impact of a road is seen for many generations to come even if it is decommissioned.

Roads allow for increased OHV access. More OHV's create noise pollution, further impacting migratory species and mating habits. OHV's contribute to further erosion of the forest soil, which causes further destruction of habitat and potential watershed damage. In addition, those operating the OHV have often been involved in poaching of forest resources, vandalism of the forest, and littering toxic trash. OHV's create further destruction of habitat and potential watershed damage. OHV impacts are long term, unknown, and unenforced. No new roads!

I walked thru several of the units including 19-4 which had nice open tree spacing and contained healthy trees, mostly older with some variation in age and diversity. The undergrowth was healthy and the units were easy to walk through. This unit does not need the restoration principles of Drs. Jerry F. Franklin and K. Norman Johnson. These units will be negatively impacted by a logging operation with no benefit to the land or forest. Tree fall, yarding corridors, compacted soils, damaged understory, impacted NSO habitat, and road construction all significantly impact the unit without improving it. Logging the large trees which are slated for removal in this unit will degrade NSO habitat. This unit should be removed from the Pilot.

I walked through 34-2. I am also against the plan for a road in this unit. The forest in this unit appears healthy, well-spaced, and does not seem to be in need of dry forest restoration principles. The impacts of logging in this unit may damage the unit more than the board feet is worth taking out.

While in Unit 34-3 I noticed that it is in need of some under burning and fuels reduction in the old logging corridors of a previous cut. My concern here is how the fuels will be contracted. Making one sweep through the forest for both the activity fuels and the fuels reduction (also using the principles of the Drs in the fuels) should create less impact than multiple entries. In addition, single entry will save the taxpayers dollars. I cannot stress enough the importance of extending the restoration principles of the project to fuels reduction. It is crucial to me supporting single entry fuels reduction contracts.

Unit 20-1 should be dropped from the Pilot Thompson Timber Sale.

The unit contains many large trees marked for removal. According to the Timber Tally provided by the BLM, over 140 trees greater than 20" DBH are marked for removal in unit 20-1. The mark targets nearly all the large Douglas fir in this stand for removal. A new "tractor swing trail" is proposed for across the ridge above this unit, through an area of healthy oakwoodland with a nice native grass understory. A relatively large amount of road renovation is also required to log the area; however the road in question is currently closed, gated, and is healing over. Logging and road construction on this unit should be canceled!

I am concerned that the issues of Pilot Joe are unresolved. Trees over 150 years old have been cut down, NSO's have not been surveyed in the Pilot Thompson area and this is not a priority for Pilot Joe. There is a lack of funding for monitoring, and the monitoring that is happening has not been completed and will not be completed until after Pilot Thompson is slated to be cut. There has been discussion on how to prevent legacy trees and trees over 150 years old from being cut down but no solution has been found at this time. The agency should create a diameter limit of 20" DBH to provide for the retention of all large, old trees in the project area.

When alerted to the issue of the miss-mark and logging of trees over 150 years old in unit 26-1a in Pilot Joe, the reaction by the agency was less than satisfactory. The Agency was defensive and sited community members by name in the paper, accusing them of having hidden agendas. That was not the way to engender community trust, support, and involvement. The community members were trying to prevent trees from being cut down while looking for an accountable, solution oriented response from the Agency. I would like the Agency to consider how to respond to criticism in a constructive and productive way.

The NSO survey in Pilot Thompson has just begun and there is a lack of funding to survey barred owls in the Pilot until perhaps next year, after the cut. How useful will the data be if it is incomplete and the cut takes place? There will be no baseline to determine NSO health vs barred owl colonization. We, the stake holders, must make great efforts to see if the restoration principles of the Pilot will benefit the NSO. One way to do this is to collect data before and after the Pilot. According to the government, the barred owl is taking over in western Oregon. http://www.usgs.gov/newsroom/article_pf.asp?ID=3165 and <http://www.fws.gov/oregonfwo/Species/Data/NorthernSpottedOwl/BarredOwl/>. We must find out how strong the populations are before and after the pilot takes place in order to obtain useful results from monitoring. Please stop Pilot Thompson until the owl surveys are complete.

The objectives as stated in the interim monitoring report <http://www.blm.gov/or/districts/medford/forestrypilot/files/mpm-interim-report.pdf> look and sound great. Some of the problems are that the objectives have not been completed at this time, there is lack of funding to even start the bird monitoring, and the data at this time are insufficient to come to speculations, let alone concrete conclusions. How can the community be expected to give its support to move forward with yet another sale when the data from the last Pilot are inconclusive? Each portion of the Pilot must be analyzed. The community and agency must learn from their mistakes and successes in a step by step manner so that on a landscape scale the Pilot truly is a success. This way the Pilot can be a proper example of the restoration principles of the Drs.

Western forests have been mismanaged for more than a century. Waiting a few years to gather data, gain funding for proper monitoring, and perform data analyses can only help

create more healthy forests. Healthy forests can support the animals, the plants, human recreation, and a controlled amount of sustained timber production. We must proceed with caution and clarity, seeking answers to our questions before moving forward, as to prevent us from making the same mistakes again and again. The NSO is already endangered, its populations hanging by a thread. The forests are already out of balance. The BLM must go slowly to ensure small mistakes are discovered and corrected so that they do not become larger issues on a landscape level of the entire Middle Applegate. Mistakes on that level are no longer acceptable, there is too much at stake.

"It is not difficult to forgive destruction in the past that resulted from ignorance. Today, however, we have access to more information. It is essential that we re-examine ethically what we have inherited, what we are responsible for, and what we will pass on to coming generations." The Dalia Lama

Sincerely,

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