



05/09/2011 06:19 PM

To Stephanie\_Kelleher@blm.gov

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Subject Pilot Project Scoping Comments

Dear Ms. Kelleher,

Thank you for accepting these comments on the Medford BLM pilot project. The pilot is a demonstration of the restoration principles of Drs. Johnson and Franklin. They rely on the protection of older forests and legacy trees, while thinning dense forest stands. I support these concepts, but I do have some concerns with the direction of the BLM in the pilot project.

The BLM should not build any new roads that have adverse impacts on forest structure, wildlife habitat or watershed values. Roads generally impact habitat and watersheds, spread noxious weeds, and are known to increase the proliferation of off road vehicles in the Applegate Valley.

Please also maintain habitat for wildlife species and explain how these restoration principles would help with the long-term recovery of the northern spotted owl and the salmon populations. While there are areas that are set aside for the owl in the project area, please explain how these will be treated in the future. The removal of larger trees (larger than 20 inches) should be highlighted and the public should be informed how these trees are contributing to the restoration objectives.

The use of the stewardship contracting authority should be demonstrated in this project, along with innovative, low-impact logging techniques. Traditional logging methods cause too much damage to the soil and the residual forest structures. Along with the use of local crews, stewardship contracting could help preference the use of low impact equipment that helps prevent excessive soil disturbance and enables the BLM to better achieved the restoration objectives of the project.

Please include a systems of third-party or public monitoring to create transparency and ensure that the processes that are implemented to guidelines in the pilot project, and also create measures that ensure equity for all parties resident within the Medford district with regard to notification, release of information, transparency of process, and honesty in description of the affected environment and predicted effects.

