March 22, 2013

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RE: Pilot Thompson Timber Sale Environmental Assessment

Thank you for considering the following comments from the Klamath Siskiyou Wildlands Center (KS Wild), Oregon Wild and the Cascadia Wildlands Project. Contact information for our organizations may be found at the conclusion of this document. Please ensure that we are sent hard copies of all future documents (such as Revised EAs and Decision Documents.)

Broadly our organizations are supportive of collaborative forest planning that takes into account public and stakeholder values and comments. We also would like to be supportive of dry forest restoration on public lands that seeks to ameliorate the effects of fire suppression, logging, off-road vehicle use and road construction on forest health and resiliency. Unfortunately the Pilot Thompson Project is neither collaborative nor restoration focused. The Ashland Resource Area has made it clear, in public meetings and in other forums, that the sole "purpose" of the project is to implement the forest management preferences of Jerry Franklin and Norm Johnson regarding public lands timber production.

There is no room for public input as to the "purpose" or "scope" of this project. Hence the Pilot Thompson project is not actually "collaborative" in any meaningful sense. Further, the agency's refusal to even consider a diameter limit, or to explain what dry forest values are "restored" by logging 30" inch diameter Douglas-fir trees in a project area in which such trees are in severe deficit, indicates that "restoration" is not a driving objective of the Pilot Thompson timber sale.

Our organizations chose to support the recent Pilot Joe timber sale on the assumption that the Ashland Resource Area would in fact retain large fire-resilient trees in the harvest units. That assumption proved unwise. We also supported Pilot Joe because of the agency's willingness to retain riparian reserve buffers and forgo new road construction. Now, following on the heels of the Pilot Joe old-growth logging, the Ashland Resource Area is proposing to downgrade up to 214 acres of NRF habitat, build up to 0.62 miles of new logging roads, and log 83 acres of riparian reserves via the Pilot Thompson project. This is an extremely disappointing vision of "collaborative restoration."

Page 1-4 of the EA indicates that an ancillary purpose of the project is to gauge the social acceptance of ecosystem restoration based forestry. If this is truly the case, then please consider implementing an actual restoration project that might enjoy broader social acceptance. There is no restorative purpose to logging 30" inch diameter Douglas fir trees, downgrading NRF habitat, skidding logs through an intermittent streambed and building more logging roads. As was demonstrated in the Pilot Joe project, there is a degree of social acceptance of projects that seek to retain old-growth forests, avoid new logging road construction and protect riparian reserves. Unfortunately, it appears more and more likely that the Ashland Resource Area will squander that acceptance.

Project Design Features

As indicated on pages 2-10 and 2-11of the EA, the seasonal wet weather haul restrictions can be waived at the discretion of the agency. This renders the restrictions meaningless and prevents reasoned analysis of project impacts. Our organizations have recently observed the impacts of ground-based yarding activities occurring during wet weather at the Ashland Resource Area Cottonwood timber sale. See attached photos 1-3.

Page 2-33 of the EA indicates that the BLM intends to allow 15' foot-wide cable yarding corridors. Our organizations participate in the planning process for dozens of National Forests, and *none* of them require cable corridors wider than 10' feet. What is it about BLM sale administration that requires 15' foot wide corridors? How much "add on" volume does the BLM anticipate will be produced by tree removal in these corridors? How many snags and large trees will be removed to facilitate the establishment of 15' foot wide cable corridors? Where in the proposed harvest units will these corridors be located? How many large trees will be utilized as guy or tail holds to facilitate this yarding?

Page 2-33 of the EA also indicates that some of these 15' foot wide cable corridors will be located across streams. Why does the EA not disclose the location and impact of corridors that cross riparian features? Does the BLM contend that yarding through riparian reserves is needed to attain the objectives of the Aquatic Conservation Strategy? Is it "restorative?" Is it "collaborative?"

Page 2-37 of the EA notes that haul routes 39-5-25.2, 38-4-28.2 and 39-5-24 are adjacent to SONC Coho critical habitat. The impacts from haul in these locations may be significant.

Page 3-34 of the EA indicates that "at the discretion of resource specialists, planned [fuel] treatments may be changed to better meet the objectives outlined in this EA." How then can the EA analyze or disclose site-specific impacts? How is the public supposed to make informed comments? How can the Decision Maker make a reasoned decision? The point of NEPA is not to disclose that the agency intends to do whatever the heck it wants during project implementation.

Logging Large Trees

The BLM's insistence on logging large trees in a "collaborative restoration" project is baffling. If the agency is truly seeking to gauge support for restoration forestry, then it should recognize that the single most controversial part of its timber sale program is the steadfast refusal to take big tree logging off the table. It is as if the agency would prefer no timber sale program at all to one that retains large trees- and perhaps the agency will get what it wants if the DeFazio/Walden legislation succeeds in protecting big trees by divesting the BLM of forest management in Western Oregon.

Page 3-3 of the EA indicates that of 14,419 BLM managed lands in the analysis area only 2,500 acres are in the 21" DBH "mature" forest vegetation class. So why practice restraint and focus logging where it will accomplish actual restoration: in the ubiquitous stands of smaller-diameter timber?

The BLM has not pointed to a single element of dry forest health that will be enhanced by logging Douglas-fir trees greater than 21" inches in diameter. On page 2-45 of the EA the agency states that it refuses to even consider implementing a diameter limit because "the decision to retain it (sic) or remove any individual tree is based on the capabilities of the site and the adjacent existing forest structure and composition." This is simply false. The actual decisions about whether to remove large fire resilient trees regard whether the tree is deemed a roadside "hazard," whether it is in a purchaser identified yarding corridor, whether it is located in a proposed new road location, and whether or not it contributes to the arbitrary basal area targets that the agency seeks to attain.

At page 3-25 of the EA the BLM acknowledges that "smaller trees, due to thinner bark and crowns closer to the ground, will suffer more damage [from hypothetical wildfires] than large trees." So what exactly is the problem with gaining public trust, achieving restoration goals and producing timber by enacting an upper diameter limit for harvest? What ecological restoration goal is achieved by logging large Douglas-fir trees in a planning area in which they are in severe deficit?

Please note that Johnson and Franklin (2012:237) state that *"[t]wo caveats are relevant in the use of age as the first screen in selecting trees for retention: (1) stakeholders and agency personnel must agree on some allowance for errors in age estimation and (2) as noted, size is important for many wildlife species, such as cavity nesters, and will be considered in developing silvicultural prescriptions."*

We concur that stakeholder agreement is crucial in this regard and that the size of trees is an indicator of importance to wildlife. Stakeholder agreement took a huge step backward when the BLM was unable to successfully utilize tree age as a method for old-growth protection in the Pilot Joe project. So now, in order to protect the wildlife values and fire hazard benefits of large trees, we are requesting a diameter limit for conifer removal such

that the public and stakeholders can be assured that the ecological benefits of large trees will be retained in proposed logging units. Please note there is no functional difference to wildlife or fire behavior between a 151 year old tree and a 149 year old tree. Rather, the BLM should seek to retain large fire-resilient trees where they still exist regardless of their age if it is truly interested in successful collaborative dry forest restoration.

Roads, Off-Road Vehicles and Soils

The Ashland Resource Area often references the BLM's commitment to soil and watershed health that it believes is demonstrated by the decommissioning of slightly more than one mile of road per year in the Resource Area since the inception of the NW Forest Plan. At page 3-38 of the EA the BLM acknowledges the presence of 20.2 miles of user created off-road vehicle routes (which the agency likes to refer to as "off highway.") Later in the EA (see page 3-53) that figure changes to 18 miles without explanation. No matter, we are used to seeing conflicting numbers, and this particular change is far less than the tripling of unit acres that occurred between the publication of the MC Thin public scoping notice and the publication of the MC Thin EA. Be it 20.2 or 18 miles of user-created ORV trails in the analysis area, the fact is that *cumulative impacts of the equivalent roaded area in the watershed continue to increase* despite the BLM's anemic road decommissioning efforts.

The BLM's treatment of the significant cumulative and synergistic impacts of logging roads and ORVs on soil and watershed values resemble a shell game. Consider: as acknowledged on page 3-71 of the EA, in calculating road reduction the BLM doesn't count "temporary" road construction (despite the long-term impacts of soil compaction and tree removal) but does count the curious exercise of "closing" roads on paper that are already functionally closed on the ground. In other words, the BLM contends that building actual new logging roads does not count towards increasing road density, but closing roads on paper that are already closed in the forest reduces road density. If one is looking for why many people tire of BLM gamesmanship and silliness, one need look no further.

The facts, in reality, are that despite the recommendations of the Middle Applegate Watershed Assessment and the direction of the Northwest Forest Plan Aquatic Conservation Strategy, the cumulative impacts of the BLM transportation system and the ORV trail network that ties into that system continue to increase, rather than decrease due the inexorable increase in ORV trails, log landings, skid trails, temporary logging roads permanent logging roads, and blading associated with road "reconstruction."

As stated on page 3-45 of the EA, "many of the [BLM] roads have been degraded as a result of use during the wet season." As noted on page 3-38 of the EA, "off road [as opposed to "off highway"] damage caused by OHV is apparent in these areas with deep tracks imprinted on the ground." As noted on page 3-49 the BLM intends to conduct additional road "renovation" activities consisting of reshaping BLM roads with a blade. Page 3-45 of the EA indicates that the agency intends to build new logging roads on

Fragile Gradient TPCC soils including a segment with slopes greater than 65%. As acknowledged on page 3-70 of the EA, "hauling and road maintenance are expected to result in short term increases in sediment and turbidity." The combined and synergistic impacts of these elements of BLM transportation management are significant and long lasting.

We agree with the statement on page 3-66 of the EA that:

> *"OHV routes are a more recent development affecting water quality, particularly within Ferris Gulch. This use is especially damaging in wet weather when ruts are formed that direct the surface water away from the natural drainage. Since these areas are often in remote locations, the erosion may progress unabated for an extended period of time, resulting in extensive damage. If a route becomes impassible due to rutting, frequently a new, adjacent trail is established."*

What we don't understand is why the agency refuses to acknowledge that its unwillingness or inability to curtail this "extensive damage" combined with its insistence on new road construction is resulting in increased, rather than decreased cumulative impacts to the soils and watershed values that the ACS, the RMP and the NWFP seek to protect.

> *"OHV use is currently creating disturbance throughout much of the Ferris Gulch drainage. Unauthorized trails located on steep slopes are distributed throughout the drainage and most of them are erosive in nature…Some trails have hydrological connectivity with channels and as a result this activity is contributing sediment to stream systems." –Pilot Thompson EA page 3-77*

In other words, the Ferris Gulch drainage is trending away from ACS compliance. What is the BLM's proposal in this regard? To construct yet more logging roads directly adjacent to some of the worst rutting on some of the steepest ORV trails. Despite the fact that "in areas not already closed by gates or other measures, OHV use of skid trails and other features such as previously closed roads has been observed, particularly within Ferris Gulch." (EA page 3-70.) And despite the fact that many BLM closure devises have simply proven ineffective and that ORV use on "closed" roads is common in the project area.

The majority of the significant, cumulative and synergist impacts associated with the transportation system are occurring on "Fragile Gradient" TPCC soils "due to the potential for surface erosion." We see no evidence that the BLM has attempted to avoid road construction and tractor yarding impacts on TPCC soils in the project area.

Instead of addressing the significant impacts detailed above, the BLM convened a "Multi-Party Transportation Working Group" for the Pilot Thompson Project. That working group identified 7 miles of existing BLM roads for decommissioning in the watershed. Only 2.55 miles of which was carried forward in the Pilot Thompson EA, the rest is shunted off to a hypothetical future project that is contingent upon hypothetical future funding. This approach can be contrasted with the ability and willingness of the

Butte Falls Resource Area to issue decisions that address needed transportation issues in the Evans Creek Watershed while undergoing timber sale planning. Of the 1/3rd of the Multi-Party Transportation Working Group recommended decommissioning that the BLM did elect to carry forward in Pilot Thompson, 1.2 of the 2.55 miles consists of simply declaring closed roads in reality to also be closed on paper. So in fact a total of 1.3 miles of logging roads are actually proposed for decommissioning in reality.

Lets do the math. There are 20 (or 18 depending on what EA page one references) miles of user-created ORV trails causing significant environmental damage in the project area. The BLM is proposing 0.62 miles of additional new logging road construction. The BLM is proposing construction of 2 additional log landings. The BLM is proposing the utilization of 15' foot wide cable corridors (including across and through riparian reserves). The BLM is proposing tractor yarding throughout the project area, including across an intermittent stream channel. The BLM is proposing 3.3 miles of road "renovation" which will include blading. And a grand total of 1.3 miles of BLM roads are to be decommissioned. Is this really and truly the Ashland Resource Area's vision of "collaborative restoration?" Does the BLM believe this is a balanced approach that reflects the recommendations of the Transportation Working Group?

Please note that page 84 of the BLM's 1995 Middle Applegate Watershed Analysis recommends that the agency "develop and maintain a road closure management plan and develop a transportation management plan for the entire area." We do not believe that the BLM has followed these recommendations prior to its proposal to build yet more roads via the Pilot Thompson project.

Page 85 of the Watershed Analysis indicates that the BLM should "develop a forum with local OHV representatives to plan OHV use in the area consistent with land management objectives." We are not aware that any such process has occurred.

Page 86 of the Watershed Analysis recommends that the BLM "reduce overall road densities." As indicated above, we believe that the combination of road construction, skid trail establishment, road blading, landing construction and proliferation of ORV trails has had the effect of increasing the Equivalent Roaded Area in the watershed.

Riparian Reserves and the Aquatic Conservation Strategy

Page 3-93 of the EA indicates that the proposed tractor skid trail through an intermittent stream channel "would have short term slightly negative impacts at the site level" in violation of ACS Objective 3.

No doubt, the BLM will respond by contending that mitigation will address this concern. Page C-37 of the NWFP directs the agency to "not use mitigation or planned restoration as a substitute for preventing degradation."

The BLM has not demonstrated, nor can it demonstrated, that logging is "needed" to achieve ACS objectives in the mature forest Riparian Reserves targeted for logging in the project. Indeed, the BLM has stated in the field that the purpose of the proposed Riparian Reserve logging is to demonstrate the dry forest logging principals in this land use allocation. The Northwest Forest Plan contains no such exemption to the general prohibition on logging in the Reserve land use allocation.

Attached to these comments is a July 23, 2010 memo by the US National Oceanic and Atmospheric Administration that is directly relevant to the BLM's proposal to impact ACS values through logging and yarding in riparian reserves and by skidding logs across an intermittent stream channel.

Achieving Desired Forest Characteristics

The EA contains numerous references to "forest stand conditions" that will allegedly be improved through logging and road building. Indeed, the No Action Alternative consists primarily of reference to "forest stand conditions" in which a theoretical fire will destroy most forest values and in which old-growth conditions will never be attained, unless the BLM saves the forest from itself by logging across the landscape. Oddly, the No Action Alternative contains no references whatsoever to the nearby 2012 Goff Fire. In the 23,000-acre Goff fire, on extremely steep (primarily south facing) slopes, approximately 7,000 acres burned at an extremely low severity, over 8,000 acres burned at low severity, nearly 6,000 acres burned at moderate severity, and 1,086 acres burned at high severity. Hardly the inevitable catastrophic disaster predicted by the author of the nihilistic No Action Alternative. The Goff Fire BAER Report is included as an attachment to these comments.

The BLM claims (at page 3-18) that VDT "treatments would increase biodiversity in horizontal and vertical stand structure through the incorporation of skips and gaps." Evidently this a very good thing when it accomplished via logging and a very bad thing when it is accomplished via a natural process:

> *"Forest pathogens and subsequent beetle kill continue to shape forest stand structure and forest development patterns by creating openings of varied sizes and allowing light to reach the forest floor. Douglas-fir mistletoe and red ring rot also create similar patterns in the analysis area." –Pilot Thompson EA page 3-10.*

Yet the No Action Alternative description of forest stand condition consists primarily of an irrational fear of catastrophic fire and the willful disbelief that old-growth can only be "created" by enlightened (and DBH-limitless) BLM logging. The authors of Forest Ecosystem Management Assessment Team had a very different view of how old-growth forests are established than the one espoused in the BLM's Pilot Thompson No Action Alternative:

> *"Late-successional forest communities are the result of a unique interaction of disturbance, regeneration, succession and climate that probably can never be created with management. At*

present, we do not even fully understand the structure, species composition, and function of these forests. The best we can hope to accomplish through silviculture is to at least partially restore or accelerate the development of some of the structural and compositional features of such forests. Because they will be regenerated by different processes during a different period from that of the existing late-successional forests, it is highly likely that silviculturally created stand will look and function differently from current old stands that developed over the last 1,000 years. Consequently, conserving a network of natural old-growth stands is imperative for preserving biodiversity into the future."
-FEMAT IV-31,32.

Fire and Fuels

Page 3-22 of the EA lumps analysis of moderate and high fire hazard. The two terms are not synonymous. Often this lumping is used to present an inflated vision of fire hazard in the project area.

Please note that page 3-25 of the EA acknowledges that the BLM is aware that "smaller trees, due to thinner bark and crowns closer to the ground, will suffer more damage [from a hypothetical wildfire] than large trees." Why then does the BLM refuse to even consider an upper diameter limit on trees to be removed from logging units? What dry forest restoration principle is advanced by the continued removal of big Douglas-fir trees in a project area in which they are in deficit?

Page 3-31 of the EA indicates that the BLM intends to log 75% of units to below 50% canopy in Alternative 2, and 70% of units to below 50% canopy in Alternative 3, despite the acknowledgement that such intensive canopy removal may increase some elements of fire hazard.

Please consider the following statement from your colleagues in the US Forest Service:

"The indirect effects of the project from a fire and fuels perspective would be an increase in potential surface fire behavior due to reduced canopy closures. The reduction of canopy closure would allow for an increase in solar radiation and air movement. Both of which would potentially decrease fuel moistures and allow an herbacious and shrub understory to develop."
-Bybee EA page 185. 2013.

Northern Spotted Owls

Our organizations strongly object to the proposed downgrading of Nesting, Roosting and Foraging habitat in the project area. Many (perhaps the majority) of BLM projects located outside of the Ashland Resource Area seek to maintain NRF habitat where it still exists. Indeed, the adjacent Williams Integrated Vegetative Management Project being planned by the Grants Pass Resource Area to test and implement the same dry forest restoration principles as the Pilot Thompson project is designed to specifically *avoid* downgrading NRF habitat. Why does the Ashland Resource Area insist on this controversial practice? The proposal to downgrade NRF habitat seems designed to

increase both the environmental impacts, and the social controversy, of the Pilot Thompson timber sale.

Page 3-110 of the EA indicates that the BLM intends to log both NRF and Dispersal habitat within occupied spotted owl habitat "cores." Such logging has disproportionate impacts to owls. We are perplexed as to why the BLM wishes to place logging units where they will have the most direct, and harmful, impacts on a listed species.

Approximately 800 acres of the proposed logging (depending upon the action alternative) is located within spotted owl critical habitat unit KLW-4 that "is expected to function for demographic support of the overall population and for North-South and East-West connectivity." Yet the BLM "treat and maintain" silvicultural prescriptions appear designed to maximize the proposed canopy removal such that stands will be logged down to the bare minimum stocking level necessary to avoid technical downgrading in KLW-4.

Pacific Fisher

Page 3-116 of the EA acknowledges that "very little is known regarding how forestry practices affect fishers' continued use of untreated areas." Despite this uncertainty, the BLM continues to plan timber sales in Fisher habitat while refusing to survey for fisher denning sites. As the BLM continues to plan timber sales and road construction that will likely cause displacement of individual Fishers, the likelihood of formal listing of this "Warranted but Precluded" species continues to increase. This is a pennywise pound-foolish approach to timber production.

The Pilot Thompson EA contains no actual quantitative analysis of project impacts on Fisher or Fisher population dynamics. The cursory conclusions regarding the impacts of "thinning" and "understory treatments" completely ignore the potential impacts of proposed "gaps" and "culturing."

Please note that the EA (page 3-117) relies in part upon "designated reserves" such as "riparian reserves" to provide "undisturbed habitat" for Fisher. This reliance is misplaced given that the Ashland Resource Area is proposing to log riparian reserves containing mature forest stands in the Pilot Thompson project.

Great Gray Owls

At page 3-114 of the EA the BLM indicates that it intends to log 321 acres of GGO habitat while relying on GGO surveys that were conducted in the 1990s. The agency's attempt to do the very minimal that it believes it is required to do by law to protect this Survey and Manage species is disappointing. The analysis and disclosure of impacts to GGO consists of unsupported conclusions and guesswork because the BLM does not actually know, or actually care, where GGO are located in the project area.

Bureau Sensitive Bat Species

Page 3-117 of the EA indicates that the BLM has not surveyed for BSS bat species and is uninterested or unable to assess qualitative impacts to bat populations from project implementation and instead intends to rely upon vague conclusory statements such as the "proposed action may potentially disrupt local bat populations and may cause the loss of habitat in some areas." The areas were this habitat loss will occur, the amount of habitat loss, the amount of local disruption to bat populations, and the population dynamics of this BSS species are not disclosed or analyzed.

Siskiyou Mountain Salamander

Given our experiences with implementation of the Pilot Joe project, we are highly skeptical of the claim on page 3-117 of the EA that talus providing habitat for SMS will in fact be effectively skipped or flagged in unit layout.

Neotropical and Land Birds

Page 3-118 of the EA indicates that "some migratory bird individuals other than USFWS species of concern may be disrupted or displaced during project activities. Some nests may be destroyed from timber harvest occurring during active nesting periods." Our organizations are familiar with a Project Design Feature in many Forest Service projects that seeks to avoid disturbance to migratory bird nesting through a seasonal restriction on project activities. Such a PDF is reasonable and has been implemented successfully be your neighbors in the Rogue River-Siskiyou National Forest. Why does the BLM refuse to try to minimize or avoid harm to nesting neotropical and land bird species?

Elk

The Pilot Thompson EA contains no site-specific information, data, analysis or quantitative numbers regarding the impact of the project on the Elk Management Area located within the timber sale area.

Cumulative Impacts

The EA does not adequately disclose the significant cumulative impacts of past logging and road construction, ORV use, fire exclusion, and concurrent and future BLM planning efforts in combination with the Pilot Thompson logging project. This is particularly important given that "habitat modification has negatively affected late-successional forest habitat dependent species by reducing stand seral stage and changing habitat structure." (Pilot Thompson EA page 3-120).

Noxious Weeds

Please note that the EA (pages 3-127 and 3-129) concludes that "surveys have documented nine species of ODA listed noxious weeds occurring primarily along roads in the project area," and that "newly disturbed areas are most vulnerable to noxious weed establishment," and that "roads are common avenues of invasion."

These findings do not seem to have influenced BLM road construction and logging disturbance plans. Further, the impacts of the foreseeable additional spread of noxious weeds in the project area due to project activities are neither analyzed or quantified.

Conclusion

Please consider a collaborative approach to dry forest restoration that retains large fire-resilient trees where they still exist, avoids downgrading spotted owl habitat, retains riparian reserve buffers and seriously addresses the significant negative impacts of the BLM transportation system and the user-created ORV network on terrestrial and aquatic forest values.

Regards,

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