

## Pilot Thompson Scoping Report

*There shall be an early and open process for determining the scope of issues to be addressed and for identifying the significant issues related to the proposed action (40 CFR 1501.7).*

The BLM requested public comment on the initial project descriptions for the Pilot Thompson project. In an effort to maximize transparency in the planning and implementation of the Middle Applegate Pilot, the BLM is providing additional documentation on the disposition of comments received. Comments were identified in response to public comments from two scoping letters (September 30, 2011 and April 6, 2012).

The overriding purpose of public scoping under the National Environmental Policy Act (NEPA) is to identify relevant issues on which to focus the analysis. While BLM respects the time and effort citizens expend writing and submitting comments, it is necessary for us to identify only those comments that help our resource specialists focus their upcoming analysis. Hence, BLM has a need to categorize comments and identify the relevant issues for analysis.

An issue is defined as ***“a clear disagreement with a proposed action based on some anticipated effect”***.

In addition, the objective of scoping should not be confused with the objective of requesting comments to an environmental analysis (EA) or impact statement (EIS). Scoping seeks to identify issues for analysis.

**The following is the result of Pilot Thompson scoping. Public comments (v) are either direct or edited quotes followed by BLM issue statements (with “check” boxes).**

### **Relevant Issues (by topic)**

#### ***Planning/ Implementation***

- ✓ *The project proposal does not meet the mandatory requirements of the O&C Act and FLPMA (sec. 701(b)) because additional allocations (Late Successional Emphasis Areas) are being created preventing management for permanent forest production.*
- ✓ *You have arbitrarily narrowed the purpose and need of the Pilot Thompson project to only one thing, the proposed action (implementation of Johnson and Franklin), which violates NEPA.*
- ✓ *Large acreages will be treated under the pilot before we have evaluated for the effectiveness of treatments, prescription, or implementation. Concern that there is not enough coordination between the ID Team, marking crews, layout, logging systems, contractors, and fuels specialists.*

*This leads to damaged leave trees, skips and gaps not coordinated with yarding corridors, commercial and noncommercial components of the project inefficiently implemented, along with a number of other issues.*

- The project proposal may not meet the mandatory requirements of the O&C Act and FLPMA (sec. 701(b)) because additional allocations (Late Successional Emphasis Areas) are being created preventing management for permanent forest production in those allocated areas.
- The purpose and need of the Pilot Thompson may be arbitrarily narrowed to the implementation of Johnson and Franklin, which violates NEPA.
- Pilot Thompson project may be implemented too soon to learn and adapt from Pilot Joe.

#### **Aquatic Systems: Hydrology, Water Quality, and Fish**

- ✓ *Use of equipment in riparian zones will impact threatened and sensitive fish species and their critical habitat near and downstream of the project.*
- Proposed activities, including road building, could impact threatened and sensitive fish species and their associated habitats.

#### **Forest Health**

- ✓ *Harvesting large trees reduces forest resiliency.*
- ✓ *Agency prescriptions compromise naturally occurring clumps reducing biodiversity.*
- ✓ *Removing far too many mid-seral trees will increase drought stress, solar heating that shocks existing overstory trees and leads to mortality as evidenced by past treatments in Armstrong Gulch, Deming Gulch, and Forest Creek.*
- Harvesting large trees may reduce forest resiliency.
- Agency prescriptions may compromise naturally occurring clumps reducing biodiversity.
- Removing far too many mid-seral trees may increase drought stress, solar heating that shocks existing overstory trees and leads to mortality.

#### **Non-native Plants and Noxious Weeds**

- ✓ *“Soil disturbance and vehicular travel facilities can increase the risk of introduction and spread of nonnative plants and noxious weeds”.*
- Forest management and logging activities can increase the risk of introduction and spread of nonnative plants and noxious weeds.

#### **Logging Systems**

- ✓ *Cable yarding corridors result in severe erosion, compaction, disturbance, and soil loss undoubtedly resulting in noxious weed invasion.*
- ✓ *Ground-based logging systems cause higher incidences of root damage and tree scarring.*
- ✓ *Cable yarding results in loss of the skips which prevents the prescription from being properly implemented.*

- ✓ *Traditional linear yarding methods cannot create the highly heterogeneous and variable landscape.*
- Cable yarding methods may result in increased erosion, compaction, disturbance, and soil loss.
- Ground-based logging systems could cause higher incidences of root damage and tree scarring.
- Cable yarding may result in loss of the skips which prevents the prescription from being properly implemented.

**OHV**

- ✓ *New road building causes disturbance of hydrology, erosion, stream sedimentation, increased OHV use, illegal poaching and dumping, noxious weed spread, and wildlife harassment.*
- ✓ *Logging corridors will turn into new dirt bike hill climbs (accessing private property). Analyze for the potential for more dirt bikes and 4-wheeling in the area (38-4-17 & 20).*
- New road building may cause erosion, stream sedimentation, increased OHV use, illegal poaching and dumping, noxious weed spread, and wildlife harassment.

**Safety**

- ✓ *Logging trucks, especially when driving too fast, pose a safety risk to others using the road.*
- Logging trucks may pose a safety risk to others using the road.

**Transportation System**

- ✓ *New roads will add to an already high road density which causes water quality impacts to salmon fishery.*
- ✓ *Cumulative impacts due to past road development and logging have reached a level of concern.*
- Specific to the proposed roads in this project, why is BLM contemplating to build such a long segment of road in 39-5-6, if you are only accessing density management (described on scoping notice at page 14)? A road is not required for those activities. We are primarily concerned with this road segment and the road in 39-5-25, which seems to be a low priority area for treatment.*
- The effects of timber harvest and road construction, when combine with other past, ongoing, and reasonably foreseeable future actions on public and private lands could potentially contribute to adverse cumulative effects to soils, water quality, hydrologic function, and aquatic and terrestrial habitats and associated organisms.
- New roads will add to the road maintenance backlog.

### **Wildfire and Fuel Hazard**

- ✓ *Removal of trees over about 10 inches in diameter is unnecessary in order to effectively reduce the potential for high-intensity fire.*
- ✓ *The probability of a thinned area encountering a high severity fire patch during its 20-year effectiveness period is about 3%; therefore, thinning does not effectively prevent the effects of wildfire.*
- ✓ *Funding has not been secured for slash treatment.*
- ✓ *Some mixed conifer plant associations have the potential to develop dense shrubby understories when thinned resulting in significant ground fuels for wildfires.*
- Removal of trees over about 10 inches in diameter may be unnecessary in order to effectively reduce the potential for high-intensity fire.
- The probability of a thinned area encountering a high severity fire patch during its 20-year effectiveness period is about 3%; therefore, thinning may not effectively prevent the effects of wildfire.
- Without followup treatment, natural plant response and post-harvest slash will increase the fire risk due to elevated fuels levels.

### **Wildlife and Special Status Animal Species**

- ✓ *The proposal to reduce stand densities would greatly reduce or essentially halt future recruitment of large snags.*
- ✓ *The proposal does not create an abundance of snags and large downed wood, and seeks to reduce shrub cover which negatively effects northern spotted owl survival and reproduction.*
- ✓ *Habitat structures such as large hardwoods important to wildlife are being removed, especially in yarding corridors.*
- Project activities could reduce the complexity of forest structure, snags, and downed wood which provide important wildlife habitat.

### **Non-Relevant Issues**

Not all comments identify (relevant) issues that will be explored in depth. Non-relevant issues are those that are:

- Outside the scope of the proposed action;
- Already decided by law, regulation, Resource Plan, or other higher level decision;
- Irrelevant to the decision being made;
- Conjecture and not supported by scientific or factual evidence; opinions; or expression of values without clear statement of dispute with the project proposals.

### **Outside the Scope of the Proposed Action**

Alternatives were suggested that did not meet the purpose and need for the project. The intent of this project is NOT to compare treatment methods, but to demonstrate one type of treatment method, the application of N/J principles. A key component to the N/J principles is to provide commercially-viable timber sales that provide jobs in local communities from forest management, logging, and wood processing. Another objective of the pilot project is to gauge the degree to which active forest management, with a focus on ecosystem restoration (as demonstrated by the N/J principles), has a broader base of social acceptance than traditional management practices.

- The alternatives suggested below would not meet the aforementioned objectives and have therefore been eliminated from detailed analysis. Primarily, these alternatives do not address the need to provide commercially-viable timber sales by substantially reducing the range of tree diameters to be harvested.
  - Compare the application of N/J principles against other forest management strategies,
  - Impose only fire and no thinning as a restoration method,
  - Place a 16-inch diameter limit,
  - Girdle and kill or fell and leave on site live trees over 16" dbh, rather than remove and sell, to actively recruit more large snags and downed log structure for wildlife,
  - Replicate and evaluate the ecological principles applied to the project for all dry forest O&C lands.
  - Consider focusing thinning activities on small-diameter trees in variable "thin from below" to retain mature and late-successional forest character where it still exists.
  - Include an alternative that analyzes a management scenario that meets all mandates of the O&C Act, to provide for a comparative analysis. *While maximizing volume outputs, this suggestion seeks to apply the Franklin/Johnson principles across all land allocations, which conflicts with the Medford District Resource Management Plan direction for Survey and Manage, late successional reserves, riparian reserves, and others. Such application is not the intent of the principles.*
  - Develop an alternative that would maintain full overstory cover, treat ladder fuels, and leave all dominant and co-dominant canopy trees in place in dry fir/pine sites, especially those featuring even-aged and dense structural conditions on higher slopes and/or harsh exposures.
- Consider the positive and negative effects of using herbicides to quell madrone offshoots. (*No herbicides are being proposed in this project*).

### **Already Decided by Law, Regulation, Policy**

Management direction (standards and guidelines) is provided for the Pilot Thompson project by the Medford District Resource Management Plan-1995 (RMP). References to the Record of Decision and Resource Management Plan (1995) are included where applicable.

- Spotted owl habitat should be protected (RMP, pp. 50-53; also, Northern Spotted Owl Recovery Plan).
- Riparian areas should be preserved (RMP, pp. 26-32).
- Sustained yield requirements should be added to the Purpose and Need (RMP pp. 16-18).
- Consider the effects of past, ongoing, and reasonably foreseeable projects in the area (40 CFR 1508.7 and 1508.8).
- Protect clean water and fish habitat (Coho salmon) from sediment pollution (RMP, pp. 26, 31, 49-50).
- Maintain connectivity for wildlife and between late successional areas (RMP, pp. 44-48).
- Protect old growth, retain habitat for old growth dependent species such as the northern spotted owl (RMP, p. 32; NSO Recovery Plan; Johnson and Franklin principles (i.e., no harvest of trees 150 years old or older).
- All new road construction, including “operator spurs” must be analyzed in the EA (40CFR 1508.8).
- Survey for red tree vole (Survey and Manage species) (RMP, pp. 24-25).
- Leave adequate and ecologically healthy levels of large snags and large downed logs for wildlife (RMP p. 46-48).
- Protect special status plants from project-related activities through buffers and/or seasonal restrictions appropriate to the species in question (RMP, pp. 24-25).

### **Irrelevant to the Decision Being Made**

- *The Franklin and Johnson (2009) unpublished report made some fundamental inaccurate assumptions about:*
  - *Current snag densities*
  - *Current rates and trends of high-intensity fire*
  - *Historic high-intensity fire in conifer dry forests*

[Response: not relevant because the project is a demonstration, not evaluation of the Franklin and Johnson principles. The effects of the project on snag densities and high-intensity wildfire will be considered in the analysis].
- Disagrees with Forest Service interpretation of “resilience” and assertion that patches of high-intensity wildfire is damaging to the ecosystem.

- [Response: not relevant because definitions are not effects. The analysis will consider the effects of the prescriptions on forest health, stand development and wildfire].
- Question past governmental rules and regulations.
  - [Response: not relevant because the project must follow existing rules, regulations and policies].
- Concern that the Franklin/Johnson principles might be applied to the broad landscape without understanding the implications of this approach.
  - [Response: not relevant because the project does not propose to treat the broad landscape, but only in one portion of the Middle Applegate Watershed. Issues about broad applications of management are land use planning issues to be addressed through resource management plan (RMP) efforts].
- Preserve private property rights.
  - [Response: not relevant because the project does not propose any activity that infringes on private property rights].

### **Opinions/Personal Preferences**

The following suggestions are personal preferences or opinions about how best to manage the project area, some of which are incorporated in whole or in part in the project design, alternatives, or mitigations being proposed. Some of the following comments may also allude to potential issues, but are not a clear statement of an issue. Many of these suggestions overlap with the project and are incorporated into the project design and/or analysis.

### ***Aquatics/Watershed/Fish***

- *Consider how this project would benefit from the inclusion of more stream restoration, road density reduction and noxious weed control, among other restoration activities.*
- *Include an alternative that does not require the construction of new roads and lessens the road density in the planning area.*
- *Please note and adhere to the watershed analysis recommendations for the project. The Middle Applegate WA (1996 version 1.3) is replete with recommendations to reduce road densities to protect water quality and fish habitat.*
- *Riparian logging presents many challenges and the BLM should either address fuels needs without commercial disturbance to reserves, or site-specifically address potential impacts through a collaborative process.*

### ***Alternatives/General Planning/Project Design***

- *Balance economic and environmental needs.*
- *Start small and learn as you go such that only a small portion of the Pilot Thompson project area (we suggest less than 5%) would be treated.*
- *An EIS must be prepared.*
- *Focus thinning treatments in areas that most need it (tree plantations, WUI, dense poles encroaching on dry pine sites and ridge tops)*
- *Franklin and Johnson ecological principles should not be constrained by allocations and restrictions not in conformance or inconsistent with existing land use plans.*
- *Focus on restoring plantations and younger stands, and in the urban interface where fire danger is greater.*
- *Stay transparent in the process.*
- *Make project look like something people don't mind looking at (visual quality).*
- *Because much of the area is a dry, rocky zone, do not overthin.*
- *Logging should be done in a low impact manner.*
- *Maintain the area's beauty.*
- *Many in the collaborative/community are skeptical of the quality and effectiveness of project implementation by agency contractors.*
- *We should be learning from past treatments so that we may move toward a more holistic way.*
- *Monitoring should be emphasized, and funding for monitoring should be secured before implementing the project.*
- *Monitor skips and gaps, retention of hardwoods, variability of treatments, and impacts to soils (compaction, loss and disturbance).*
- *Monitor northern spotted owl and Pacific fisher.*
- *Monitor noxious weed spread.*
- *Effectiveness of age estimations.*
- *Consider a no roads alternative.*
- *Consider riparian reserve treatments.*
- *Consider the regeneration potential in gaps – Is natural regeneration a viable option or is planting needed?*
- *Monitor owl occupancy.*
- *Uniform treatments based on spacing should be abandoned in favor of a more variable pattern.*
- *It is my contention that much of the dry fir forest in the region was significantly more open in regards to small, understory trees.*
- *The agency has failed to document the historic conditions or list documents supporting their interpretation of historic landscapes.*
- *One person defined the term "collaborative" to mean that BLM will modify and implement all of the public's ideas.*
- *Offer more opportunities for public involvement outside normal work hours.*

- *Concern with delineation of LSEAs and their long-term implications.*

### **Fire/Fuels**

- *BLM must tie the activity fuels treatment to the project in a way that ensures that activity slash is indeed treated.*
- *When burning slash piles, minimize mortality of surrounding trees.*
- *Supports neighbors and BLM to “cleaning” (fuels reduction) their properties.*
- *Reduce mortality to leave trees when burning piles.*

### **Forest Health**

- *Manage for Forest Health and Resiliency*
- *Maintain diversity in the shrub and lower tree canopy.*
- *Maintain biodiversity and age diversity.*
- *Wetter fir forests are not a priority for restoration.*
- *Consider reducing the amount of thinning of 8” to 12” in diameter hardwoods; many trees at that diameter are very old and are the most resistant to a warming climate and cause re-sprouting issues.*
- *Consider conducting a series of workshops and public meetings to address ecological restoration of oak/chapparral plant communities. Create a working group, including public members and the scientific community, to define appropriate and ecologically responsible restoration treatments in these ecosystems.*
- *Consider leaving all broadleaf trees six inches in diameter and greater.*
- *Creating in-stand variability should be appropriate to the site and not in excess of ½ acre. While gaps up to 1 acre are stated in the principals, it seems that the creation of gaps was abused in the Pilot Joe.*
- *The age limit on tree removal of 150 years needs adjusting because old growth is different in the Applegate, and the intent of the N/J principles related to old growth won’t be met.*
- *Oak habitat has been degraded rather than restored by wide-spacing thinning, contrary to historic and ecological processes, and results in noxious weeds and non-native annual grasses.*

### **Timber Sale and Contract Development/Economics**

- *Use stewardship contracts that work to offset costs of important restoration work.*
- *Consider helicopter logging which is less invasive than ground or cable systems.*
- *Utilize low impact, innovative logging systems.*
- *Address how the application of F/J ecological principles will provide jobs, promote economic growth, and generate revenues for the benefit of O&C Counties on a sustainable basis.*

- *Make opportunities for local contractors.*
- *Include commercial treatments in riparian areas*
- *Include commercial treatments in mature timber*
- *Do an economic analysis to ensure that the viability of any stands proposed for helicopter before implementing them.*
- *Consider opportunities for dry weather operations during the wet season and wet weather hauling (i.e. rock roads).*
- *Economically viable timber sale – be flexible in the EA and timber sale contract to allow a variety of equipment to access the sale areas. – Specify damage tolerance levels rather than making firm restrictions.*
- *Allow the use of processors and fellerbunchers in cable units to increase the economic viability (decreases disturbance by reducing cable corridors, allows for more even distribution of CWD post-harvest).*
- *Consider long-term supply of timber when addressing “gaps”.*
- *Consider the product being sold and the type of harvest proposed when determining the type of contract to use (lump sum or scaled).*
- *Utilize innovative, low impact methods of logging such as intermediate supports, full suspension cable yarding, and small diameter yarding equipment.*
- *One person pointed out that “benefiting the local economy” means to create jobs for Applegate residents, not Rogue Valley residents.*
- *Traditional linear yarding methods cannot create the highly heterogenous and variable landscape.*

### **Transportation System**

- *Use existing roads and decommission post-project.*
- *Remove unneeded, problematic logging roads (seek out opportunities for road decommissioning).*
- *Adhere to the Watershed Analysis recommendation to reduce road densities.*
- *Close existing roads open to OHV because they are causing erosion.*
- *Close existing roads near streams because they are causing water quality impacts to critical salmon fishery in the watershed.*
- *Maintain Road Access for the Public (not related to Timber Sale)*
- *Road decommissioning – roads that are in poor locations and are causing resource damage are ok, but roads that are in good (stable) condition and access future timber harvest stands should not be decommissioned.*
- *Consider road construction – needed for active management.*
- *Continue to look for opportunities to expand the road system to ensure active management that is economical.*
- *Do an economic analysis to determine where permanent rocked roads can be constructed.*

- *Concern that there is undue resource damage associated with OHV activity in the Ferris Gulch area – decommission roads not needed to minimize impacts.*
- *Concern with the visual impacts of cable logging and skid roads.*
- *Concern that gates are not effective at stopping unauthorized OHV use.*
- *Consider both the economics and ecological cost of building roads.*
- *There are enough roads in the planning area that the BLM could advance a project without building roads. If the BLM is simply building roads to “test difficult issues” this is not an appropriate reason.*
- *New roads are expensive to build and add to the maintenance backlog; sufficient access already exists.*

### **Wildlife**

- *Apply Survey and Manage exemption criteria, including the legacy tree exemption and the dry forest restoration exemption.*
- *Avoid owl “take” by making the LSEAs large enough for owl nesting, roosting, and foraging around high use areas.*
- *Acknowledge that patches of high-intensity fire are natural, and that many plant and animal species depend on such habitat.*
- *Improve habitat for deer, elk and other non-ESA species, especially early seral stage habitat and vegetation that provides forage, for elk, deer, and other wildlife.*
- *No “take” permits for endangered species.*
- *When treating spotted owl nesting, roosting and foraging habitat, please refrain from downgrading and removing the habitat.*
- *Consider the condition of the landscape on both public and private lands then find the right landscape-level mix of treated and untreated stands necessary to recover spotted owls and maintain viable populations of other imperiled species that depend on dense forests. Consider how much extra spotted owl habitat needs to be conserved to mitigate for the competitive influence of the barred owl and habitat removal on public and private land.*

### **Non-Issue Comments**

The following scientific sources/citations were provided without disclosing why the science is relevant and applicable to Pilot Thompson, or inaccurately explained why the science is relevant. BLM did not consider these further in identifying issues relevant to Pilot Thompson.

- Highly episodic fire and erosion regime over the past 2,000 y in the Siskiyou Mountains, Oregon. Colombaroli and Gavin.
- Implications of spatially extensive historical data from surveys for restoring dry forests of Oregon’s eastern Cascades (Baker 2012).

- Numerous scientific references (i.e. Cochran and Barrett, 1995, 1999, Larsson et. al. (1983) related to stand density and mortality in ponderosa pine stands in California.

## **Questions**

The following questions will be addressed in the environmental analysis (EA).

- *What is the treatment for madrone and oak stumps?*
- *The BLM identifies 140 acres of riparian reserve thinning, but it is not clear from the scoping notice where those areas are located. It is likewise not clear what kind of actions would happen in these streamside areas. Why are non-commercial treatments not adequate to restore these riparian areas? How would the BLM keep equipment out of reserves? What type of soils disturbance would be caused from logging in reserves? Where would yarding corridors be located?*
- *Treatment area prioritization: While we broadly support the selection of areas for treatment (generally, north and west facing slope emphasized for LSEA, south and east facing slopes for fuels reduction), we are very puzzled by the inclusion of some of the units. For example, 39-5-25 has very wet elements and is at the top of the watershed, where there is more moisture. It would seem like a low priority for treatment. Please explain how these specific units were selected for treatment, particularly those that do not appear very "dry."*