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Concern 1 - The unique geochemistry of the region must be address.

As you know the region in question including the historic Bohemian Mining District as was known for both gold and mercury mining. Undoubtably, most of the hazardous materials generated during this period has already been flushed out the system, but in the 1940s and 50s several dams were built by the Arm Corps of Engineers causing the mercury in particular to accumulate behind the dams. Already two of these reservoir lakes have dangerously high levels within the fish population and two other lakes in the regions developing the same problem. There is a need to address this within the management plan to either work on mitigation or at least not exasperating the problem.

Concern 2 - Potential hazardous historical artifacts.

Another problem with historic mining districts is the likelihood of hazardous conditions left by mining. It is common in areas where mining patents were made to have the remains of unsuccessful operations. The most common of these are glory holes. While glory holes provide nice habitats for animals, over time they will fill in with vegetation and create dangerous conditions for heavy equipment and the possible sink holes. If the permitted logging is to go beyond thinning operations, provisions must be made to limit the use of heavy equipment to minimize the potential risks caused by these hazards.

Concern 3 - Mitigation of hazardous environmental conditions as the result of workplace safety

Given the already fragile nature of the environment in question, there should be provisions that also include other federal laws that could have an impact. In particular RCRA and OSHA safety laws. Additional contaminates into the environment cannot be tolerated. Those who are allowed to have permits must be extra careful not to bring materials into the environemnt that could be detrimental to it if spilled including petrochemicals. Additionally, safety regulations must be enforced. Even if a company is using best practices lagging techniques, if run unsafely they can be more harmful to the environment as a whole than clear cut logging.

Concern 4 - Conservation and preservation of open space, viewsheds and recreation

The recent economic crisis is not only impacted the logging industry, it has also impacted the communities that rely in part on the recreation industry. Few visitors to the region realize that the public lands are checkerboard with private and mistakenly assume that clear cutting is happening on public lands. Since there is not transition between the two, the difference can be visually jarring. This distract from one of the regions major selling points for visitation. The management plan should make an effort to create transition zones between public lands and privately held lands by coordinating with other agencies and private land holders and by assisting local governments in dealing open space plans and viewshed management areas that incorporate public lands into zoned areas.

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