

Dec. 3, 2007

RECEIVED

DEC 11 2007  
Lona Pierce  
56498 Crest Drive  
Warren, OR 97053

1311

Comment to be included for proposed WORP on BLM lands

I attended the public forum presented in Scappoose by BLM personnel on proposed changes to management of BLM sections in Oregon. My comments are specifically in regard to Columbia County.

The cumulative effect of logging in this county has resulted in virtually all of the forestland being logged at least once, with a few mature trees left standing in scattered locations -- mostly on BLM lands, or a few small-woodlands owned by families. The vast majority of timber industry lands have been logged twice, resulting in third-growth tree farms covering more than 80 percent of the county, with the total approaching over 90 percent as logging continues.

**The only sections not logged at the maximum allowed under the Oregon Forest Practices Act are BLM lands.** Those sections that have forests at or approaching 80 years old are the only place where local residents can recreate, gather mushrooms, hunt, hike, birdwatch and other outdoor activities in forests that still maintain much of the original complexity of Oregon temperate rainforests. These are the only sections with enough variety in vegetation to offer suitable habitat for many forest-dwelling species of wildlife. **In Columbia County, the public has no access to good-quality forests except on lightly logged O & C lands.**

Although O & C lands are supposed to generate funds from timber, they are also supposed to provide recreation, and protect watersheds and wildlife. Scientists have confirmed that the proposed **Alternative 2** will fail in all of the above. They recognize that Alternative two does not follow federal law in regard to the ESA and Clean Water Act. The EPA recognizes that Alternative 2 will not protect federally endangered species.

Unless additional sections in Columbia County are managed as late-successional reserves or as landscape sections than are proposed, **complex temperate rainforests will be extirpated in Columbia County.** This is contrary to federal and state mandates to provide multiple uses while safeguarding watersheds and wildlife habitat.

The argument that there are BLM sections elsewhere in the state that fulfill those requirements does nothing for habitat, recreation, and water quality **in Columbia County.** Residents here should not have to drive a hundred miles or more to reach forestland to gather mushrooms, hunt, or hike when BLM sections are within a few miles from the most populated areas of the county. BLM sections should not be managed as industrial tree farms.

Recent studies have shown that Northwest forest birds are becoming rare. **We have an obligation to not add more species to the Endangered Species List, let alone not protect those already on it.** Grouse, owls, thrushes, woodpeckers, evening grosbeaks are all falling in numbers because of logging. Many mammals are also disappearing from the Pacific Northwest, including forest bats and fur-bearers in the martin family. They all need complex forests. By proposing to essentially eliminate forests from Columbia County, migrating birds will find nowhere to go as they pass through or try to overwinter here. Alternative 2 will likely extirpate hundreds of plant and animal species from Columbia County. **This is indefensible.**

I doubt if in the 1930s the authors of the O& C lands rules could have envisioned the total extirpation of forests from large regions of the Pacific Northwest, in part due to the mandate to harvest timber. The O & C rules also mandate other uses be preserved. This will not be done under Alternative 2., which I strongly oppose.

Alternative 2 will dash any hope that salmon runs and water quality can be improved in the Scappoose and Milton Creek watersheds, and Clatskanie watershed. Even the Nehalem River headwaters start in the Bunker Hill area, and flows through BLM sections. The narrow riparian buffers and clearcutting on the hills above these stream systems will ruin their water quality and quantity.

I strongly recommend No Action, with the addition of four entire sections to be managed as complex late-successional forests. Sections must be those that have significant stands of trees approaching or exceeding 80 years old. Gunner's Lake region, Tater Hill, the section next to Scaponia Park, and second-growth in the Chapman area are all excellent candidates to manage as late successional stands.

Even though Columbia County BLM sections do not have unlogged old growth, they do maintain complex forests that are approaching old-growth status. **The BLM is obligated to not only provide funding through logging, but also maintain sections that offer local residents recreational opportunities, protect water quality, and not extirpate plants, animals, and ecosystems on its lands.** In order to fulfill its responsibility, the BLM should manage **at least three thousand acres** as complex late-succession forest in Columbia County, focusing on sections with stands that have not been logged for fifty years or more. Alternative two must be rejected outright. **No Action is the minimum required to fulfill local needs, although adding four late-succession sections is highly recommended over present management strategies.**

*Lorna Pierce*