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BLM's Western Oregon Plan Revisions
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WORP Team members,

I would like to provide the following public comments concerning the BLM WOPR. While most of my comments pertain to northwest Oregon, I believe they have additional implications and ask that you consider them throughout your planning area.

Public Domain lands are not subject to the O&C Act. On page 15 of the DEIS it is stated that approximately half the BLM's PD land, small intermingled parcels, would be managed for the sustained yield of forest resources. What about the other 50% which the DEIS implies would not be managed for sustained yield of forest resources? It is not clear how these lands would be managed or how timber harvest on these other lands was modeled and what assumptions were made. To not differentiate a slower rate of timber harvest on these Public Domain lands to reflect multi-use management rather than O&C requirements would violate FLPMA. Special Status Species (including T&E species) should receive a higher degree of protection on all PD lands – regardless as to if they are small intermingled parcels – this would reflect the multi-use spirit of FLPMA.

Public Domain parcels should be mapped with maps made available so it would be easier for the public to make informed, meaningful comments as to how our public lands are managed. As an example, there is an 8,500 acre block of BLM Public Domain land north and east of Tillamook, Oregon that contains spotted owls and marbled murrelets and numerous anadromous fish runs; bald eagles also are known to use these PD lands. How would this land be managed? This block of BLM forest is clearly not a "small intermingled parcel" and should not be managed as the same as O&C land; it should be managed to reflect multi-use management. Management of this block of BLM ownership focusing on relatively short-rotation timber harvest as on O&C land would violate FLPMA especially given the fact that Northwest Oregon is an area identified as being of "special concern" for spotted owls and murrelets by USFWS.

Selection of Alternatives 2 would not be consistent with the Marbled Murrelet Recovery Plan and/or the stated Purpose and Need of the DEIS. On page 60 of the DEIS it is stated that management would be consistent with the Marbled Murrelet Recovery Plan; the Purpose and Need (page 4) says the BLM would conserve habitat needed for the survival and recovery of ESA listed species. However, on page 682 it says in the Coast Range there would be decreases in the quantity and quality of marbled murrelet nesting habitat under Alternatives 2 and 3 for the next 50 years. In addition, Alternative 2 contains no requirement for murrelet surveys prior to activities which would modify suitable murrelet habitat. For the reasons as explained below, selection of Alternative 2 would not be contributing to recovery of the murrelet – perhaps it would avoid "jeopardy" under the ESA but it would not be contributing to the recovery of the species as required.

The Marbled Murrelet Recovery Plan states that the next 50 years is the most critical for murrelet recovery. On page 123 it identifies actions necessary to address recovery objectives – these include but

are not limited to increasing the amount, quality and distribution of suitable nesting habitat, decreasing fragmentation, and surveying remaining suitable habitat to identify potential nesting areas. Additionally, pages 127 and 141 of the Marbled Murrelet Recovery Plan discuss the importance, especially in northern portions of the Oregon Coast Range zone of restoring the north-south distribution of marbled murrelet populations. Selection of Alternative 2 would result in the exact opposite situations. For stated reasons, selection of Alternative 2 would not be consistent with the Murrelet Recovery Plan and therefore would not be consistent with the Endangered Species Act and/or the stated Purpose and Need of the DEIS.


There is a conflict between OHV emphasis areas and the management for old-growth dependent species. A large portion of Nestucca LSMA(43) in the northern Coast Range of Oregon is within the same area as BLM's Upper Nestucca Motorcycle Trail System. Especially on nice spring and summer weekends (during the spotted owl and murrelet breeding season) BLM's Upper Nestucca Motorcycle Trail System is visited by literally, hundreds of OHV enthusiasts riding on the area's forest roads and the BLM OHV trails which permeate the area. Oregon Department of Forestry has additional motorcycle trails in a huge area of the "Tillamook Forest" located adjacent to and slightly to the north of the BLM lands; these trail systems serve as "motorcycle magnets" drawing riders from near and far into the entire general area of the Nestucca LSMA(43).

All of this OHV activity on public land (theoretically being managed for old-growth dependent species) generates a tremendous amount of loud noise and general disturbance within the area; it is my feeling that this represents a conflict which seriously compromises the potential effectiveness of the area to truly function as spotted owl or marbled murrelet suitable habitat. I would also question if there are other "high intensity uses" such as BLM's Nestucca OHV Trail System occurring in other proposed LSMAs throughout the region which could compromise their ability to function as necessary if the stated recovery objectives are to be realized.

Given the fact that a very large portion of LSMA 43 contains a portion of BLM's Upper Nestucca Motorcycle Trail System, I would question if the LSMA, as planned is large enough to meet wildlife recovery objectives within the area. Specifically, was the presence of this motorcycle emphasis area and the resultant potential adverse impacts considered in the analysis of adequacy of this LSMA to develop into a functioning large habitat block?

I believe it very necessary to recognize and address the special conservation needs of the spotted owl and marbled murrelet in Northwest Oregon – an area identified as "special concern" by USFWS. Biologically, the Nestucca area is very important to the recovery of these species as it represents the northern-most larger block of federal ownership in the Oregon Coast Range. I also believe it necessary to address the presence of the Upper Nestucca Motorcycle Trail System within LSMA 43, as well as the existence of other "high intensity uses" such as managed OHV trails riding areas located within other LSMAs throughout the region. In order to resolve these conflicts it seems appropriate to either phase-out the conflicting usages, or consider their existence and enlarge the sizes of the LSMA beyond what is considered to be minimally adequate to form a large block of functioning habitat in order to help offset the adverse impacts resulting from this chronic disturbance.

Thank you,

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Steve Bahe