

Pacific Rainforest Wildlife Guardians
2008 Oregon State Forest Timber Sales
Public Comment of Marcia D

Oregon Department of Forestry
e-mail: rwelty@odf.state.or.us

Tillamook District:
11, 2007

March

Surveys for Northern Spotted Owls and Marbled Murrelets have not been completed. We cannot approve of any of these sales without complete surveys. There must be T&E suitable habitat and population statistics, also, or I cannot approve of any of these sales.

Wakefield; We have a very big problem with this timber sale. I will sue if it is not cancelled or significantly changed. Snark Ridge Sale thinned right up to the core area on the east side. There were 4 Spotted Owls present, 3 each year, but they logged it anyway. Now Wakefield is proposed to log right up to the west edge of the core area. ESA take and nest sight abandonment would occur if this sale proceeds. The Bastard Creek site has been monitored with successful breeding for most of 30 years. This sale is in the heart of the Lower Nehalem Spotted Owl Cluster. It was to have been preserved by the Habitat Conservation Plan. It is an illegal raid of intentional take. The clear-cut in Area 2 must be changed to a light thin removing 30% of smallest trees regardless of species and cut in half to a 60 acre thin, removing all of the eastern half and Area 1 from the sale.

Opening up the Bastard Creek Spotted Owl area would harm the microclimate, invite predators that could kill adults and fledglings, and Barred Owls to take over the nest site. The male was flushed from the nesting area by Cougar Monster Timber Sale to the north east. Pursuit and harassment of these owls is take under the Endangered Species Acts. I demand that Wakefield be cancelled permanently. **Cancel Wakefield, Please.**

Runyon Ex; has Bald Eagle nests. If wide enough nest tree buffers and visibility buffers are left, it might be OK as long as there is no disturbance until after the Eagles leave the nesting area on their own. Another 400 feet beyond the 400 foot buffers should be light thins, not clearcuts.

Sam's Saddle; Probably has plants proposed to be listed as threatened. People should go look for them and mark them if found. They may be difficult to see, close to the ground Candy Flower that grow along trail edges in partial sun. It is best to find out what they are. The prospectus does not say.

SeShong; is a grossly oversized clear-cut, 104 acres over the 120 acre limit. This 224 acre modified clear-cut is illegal. We recommend that Swiss Needle cast infected trees that are in bad condition be removed saving as many recovering trees a possible to help create SNC resistance. All hardwoods must be saved. Diseased trees in wet area drainages to the Trask should form wider buffers along springs, 100 feet minimum, not 25. SNC trees stabilize soil from erosion and do not block much sun. It should be changed to a thin wherever possible.

Rock N Roy; We cannot approve of this sale until Marbled Murrelet and Spotted Owl surveys have been completed. Both have been known to inhabit and nest in the area. Area 1 is an illegal oversized clear-cut. ODF should not be clear-cutting except in extreme situations. It destroys habitat unnecessarily.

Power Bales; claims to preserve the visibly sensitive areas. They have used 400 foot buffers. If that is true, we commend ODF.

Point T Boot; has threatened and endangered plants. People should go look for these after finding out what they are and mark them well, notifying ODF. No tractor yarding must be used anywhere near them, or clear-cutting. Spraying Vine Maple must not be done. No herbicide.

Phone Murphy; We cannot approve of this sale until all surveys are completed.

North Murphy; Please thin. Do not clear-cut. Thins can be reentered later for a sustainable economy. Clear-cuts take land out of production for a life time. They destroy wildlife habitat and adversely effect the climate.

Musical; Please cancel this sale. It is in a heavily used recreational and highly visible area. It is also very slide prone. It is illegal oversized clear-cuts in the scenic area of the Wilson River Highway. Don't clear-cut our favorite recreational areas. It is very beautiful here. Leave it alone. Cancel it!!

Mid Fork Alder; Very steep tributary headwaters must not be logged. Those are out water sources. They fall apart when logged. Why are you clear-cutting everything. What ever happened to sustainable forestry of State lands? Surveys for Marbled Murrelets and Spotted Owls are not complete. We cannot approve of this sale.

Mary's Butte; Like Musical, this sale decimates one of the most highly used recreational areas of the Wilson River. It will be a hideous eyesore and infuriate all of the recreational users. You must cancel this sale and have more respect for the rights of the people. It is possible that it could be changed to a light thin, but the

Department seems to want to gouge the scenery most, so forget this one, cancel it. It threatens Salmon runs with landslides, too.

Lower Jones; this connects Musical to Mary's Butte to just log the hell out of everything in the Wilson River recreational area. Please keep your logging higher and out of our play lands.

Cougar Camp; is an enormous hardwood conversion. Hardwoods enrich and stabilize the soils. They only grow on unstable land. Hardwoods provide food for many species including fish, and shelter for bats. All Maple and most Alder and largest Red Cedar must be kept. This sale destroys the riparian of Cronin Creek for miles. It is in the most beautiful part of the Lower Nehalem recreational area. Cancel this sale. It is harmful in every way, adjoining with another huge cut, Burma. It is too much already that you are logging everything between Lost lake and Spruce Run Parks. Please stop destroying our most popular recreational areas. This region is very important to Spotted Owls, too. Cancel Cougar Camp. It's huge and incredibly destructive to aquatic habitat in Lower Nehalem River and Cronin Creek, most valuable refugia for Salmon and Steelhead. 1000 acres of riparian! Why not just drop a big bomb on the Lower Nehalem? This isn't management. It's mass destruction. Cronin Creek is fed by many, many springs. Where they flow out into the Nehalem is the largest area of suitable nesting gravel in the whole river. Silt from road building and logging would clog the spawning gravel causing suffocation of eggs and new hatchlings. Logging the springs would lower the chance of survival of smolt by decreasing late summer water supplies and cover from predators, and raising water temperatures. Cronin Creek supplies cold water to the too hot Nehalem, allowing fish to successfully spawn and rear at it's mouth and up the mainstream. If logging opens the canopy to full sun, the Lower Nehalem will become further impaired than it is already, with lethal temperatures reaching even higher and for longer durations. Please don't do this to the fish.

Please reduce the cut drastically in Tillamook District. Stay out of our recreational and wildlife areas. Thank you.

If pollution of the waters or harm to threatened species might occur as a result of any of the sales or actions, I will sue under the Clean Water Act or Endangered Species Act.

Thank you,

Marcia K. D.

May 10, 2007

Marcia K. D.

Re: Tillamook District FY 2008 AOP

Dear Ms. D.:

Thank you for taking the time and effort to review in-detail the Tillamook District's FY 2008 Annual Operations Plan and provide comment. I would like to respond to each of the concerns you have expressed about the fourteen (14) proposed sales you identified from the 2008 sale plan; eleven planned sales and 3 alternate sales.

First, all proposed operations in our FY 2008 AOP are in compliance with ODF's policies and regulations, including the NW Forest Management Plan, which by reference directs that management of State Forest lands be compliant with the federal Endangered Species Act (ESA), the Clean Water Act (CWA), the Oregon Plan for Salmon, and applicable Oregon Revised Statutes (ORS's) and Administrative Rules (OAR's). Our plans undergo review internally by staff resource specialists, planners, foresters, and managers in an effort to ensure that proposed operations are consistent and in compliance with these policies, and that an appropriate level of conservation and protection is considered and prescribed.

Wakefield: This sale is within 1.5 miles of the Bastard Creek owl activity center, which was first established by surveys in 2003. To date, this has been determined to be a resident pair. There has been no evidence that this owl has nested nor have any nest trees been found for this activity center. Since this sale is within 1.5 miles of an activity center a biological assessment is required and has been prepared by the ODF NW Area Wildlife Biologist to evaluate the sale for consistency with the requirements of the Agreement for the Conservation of Northern Spotted Owls and its take avoidance strategies. This sale meets the requirements of the agreement and the biological assessment has been shared with USFWS and ODFW. ODF will include feedback provided by USFWS in the operation plan.

Runyon Ex: Bald eagles have been sited in this area but a nest has not been identified. A site plan for the potential nest site is being developed by ODF's NW Area Wildlife Biologist in conjunction with the forest managers to identify and buffer nesting and roosting habitat as required by the Forest Practices Act. This sale is in compliance with existing T&E species policies and regulations.

Sams Saddle: Pre-screening did not reveal any known Threatened or Endangered plant species in this sale. A single individual plant that is on the state candidate list was identified as being in the general location of the sale, but there are no legal protection

requirements for this plant. If there are any found however, during sale layout or during operations then their location will be documented.

SeShong (Alternate): This sale totals 224 acres of clearcut but is separated into two areas by a Riparian Management Area (stream) buffer that would be at least 300 feet in total width. Each of the two clearcuts will be less than 120 acres.

This is a young dense stand of Douglas-fir and alder which is not a good candidate to manage to a complex conifer structure. The Douglas-fir trees have very small live crowns and conversely small root systems. A component of the larger Douglas-fir treed will be left on the landscape for green tree retention and future snag and down wood recruitment. Hardwoods will be retained in the stream buffers. This prescription has been determined to be the fastest way to establish a healthy conifer stand at the site which can be managed to an OFS stand.

Rock 'n Roy: Area 1 is a retention cut which will leave an average of 22 trees per acre and 70 square feet of basal area of residual trees. A harvest unit with a residual basal area between 33 square feet and 79 square feet does not have an acreage limit under the Forest Practices Act. This sale is in compliance with existing T&E species policies and regulations.

Power Bales: “The portion of the west side of Area 1 within 300 to 400 feet of the South Fork Trask Road is also designated as county resolution land, landscape management area. The planned partial cut prescription should retain the scenic value of this area.” This area of the sale is a partial cut not a buffer, but because of the tree retention no scenic impact is anticipated.

Point T Boot: This sale is being surveyed for Threatened and Endangered plants. If T&E plants are found the Oregon Department of Agriculture will be consulted and appropriate restrictions will be applied to the sale.

Phone Murphy: This sale is in compliance with existing T&E species policies and regulations. All survey requirements will be met prior to completion of the sale.

North Murphy: This sale meets the requirements of the NW Forest Management plan. A clearcut has been determined as the appropriate prescription for this stand.

Musical (Alternate): This sale has been reviewed by the Area Geotechnical Specialist. Additional consultations will occur during sale preparation. All High Landslide Hazard Locations will be buffered according to Forest Practices Act and NW Forest Management plan requirements.

Mid Fork Alder: This sale is in compliance with existing T&E species policies and regulations. All survey requirements will be met prior to completion of the sale. This sale has also been reviewed by the Area Geotechnical Specialist. Additional consultations will occur during sale preparation. All High Landslide Hazard Locations will be protected to meet Forest Practices Act requirements and the NW Forest Management plan. This

mature hardwood stand will be harvested and conifer planted to establish a future conifer stand.

Mary's Butte (Alternate): This sale is a partial cut. Input from the Tillamook Education and Interpretation program has been solicited and will be incorporated in the final sale prescription.

Lower Jones: The majority of this sale is a partial cut and meets the requirements of the NW Forest Management plan.

Cougar Camp: This sale has been designed to protect streams within and adjacent to harvest areas to meet the stream requirements of the Forest Practices Act and the aquatic strategies of the NW Forest Management plan. Many hardwoods will be reserved throughout the sale areas.

Thank you again for your in-depth comments. This year public comments will be posted on the web site along with the ODF reply. Your letter will be put into a PDF file in which you will be only identified by your first name and initial of your last name. Your address, email and phone number will be blocked out. Organization letterhead will be retained. If you have any concerns regarding your comments being posted please contact:

Roger Welty, Planning Specialist
Oregon Department of Forestry
2600 State Street
Salem, OR 97310
503-945-7258, fax: 503-945-7376

Sincerely,

A handwritten signature in cursive script that reads "Ross Holloway". The signature is written in dark ink and is positioned above the printed name and title.

Ross Holloway
Tillamook District Forester

Comments on annual public forest plan 2007-2008
Recreation Concerns

OREGON DEPARTMENT OF FORESTRY
RECEIVED
MAY 1 2007
TILLAMOOK

March 27, 2007

State Forester, Tillamook District

Subject: Maintaining ODF marked trails, motorcycle and quad heritage forest trails before and after logging

Dear Mr. Holloway:

"Heritage" refers to the trails that have been ridden for many years. The suggestions I have after reviewing the Tillamook District 2007-2008 public forest plan and previous plans are:

1. User defined and user maintained trails should be encouraged and unlimited. Many new riders are coming to this area and it is evident when speaking with these riders they are avoiding the heavily rocked trails in other areas.

The "Jeep Trail" is an example off North Fork Trask. It is seldom ridden since the trail was rerouted and reenforced a few years ago with pit run rock. It is not good for man, machine or tires!

2. The more trails there are to ride the less wear they receive. User defined would be user maintained and would require little ODF resources. Many volunteer hours would be accumulated.

3. Our loosely organized group of many people ride hundreds of trails.

The trail, bottom left picture, is a great old trail from the top to the East Fork. If the hundreds of trails that are "rides" were laid side by side they wouldn't even cover this one clear cut. It was a thriving forest just four years ago.

This is just an example for a reality check when it comes to considering adding motorcycle and quad trails.

We do, however, understand why this is temporarily necessary, much like a corn field looks terrible after the harvest but nine months later is once again producing a mature crop. Timber just takes a little longer for the next crop. We also understand, and have seen, that at anytime a D-9 CAT can come in and turn a puny trail into logging roads and during harvest gut the trails with yarding. We think they can and should be restored. All of them. Some effort by the logging company and volunteers would see to that.

Name _____

Phone _____

City

TILLAMOOK



a. Rock piles at head of Jeep Trail for trail work

b. Trash bags on quad from usual trail trash collection

May 29, 2007

Public Comment Response to:

Fourteen (14) Tillamook residents who submitted the above comment letter regarding Recreation Concerns.

Re: Maintaining ODF marked trail and other forest trails before and after logging.

Thank you for taking the time to comment on the Tillamook District's FY 2008 Annual Operations Plan. Your comments are valued and we do give them sincere consideration. I will attempt to respond to your concerns in your letter dated March 27th, 2007.

As you may know, prior to 1993 there was very limited recreation management on the Tillamook Forest, and users created their own OHV trails where, and whenever they had the energy to do so. Some of these trails resulted in considerable damage to soil, water, aquatic and riparian resources, and to forest vegetation. In some places they crossed fish-bearing streams, delivering silt. In other places they were very steep and funneled water, causing erosion. Many were unsafe for the average OHV rider. Many sections of these trails are in poor condition, are over-used, cause undesirable impacts, and are very difficult and expensive to restore. Trails, like roads, can have a negative impact on forest resources. Good planning and management is necessary to protect resources from undesirable impacts such as accelerated erosion, to provide for public safety, and to create an enjoyable experience for all recreational users of the forest.

In 1993, the Tillamook State Forest Comprehensive Recreation Management Plan was developed. It recognized the need to minimize resource damage and conflicts between various user groups, including both motorized and non motorized users. It also established a program intended to provide consistent, coordinated, and comprehensive recreation management within the framework of a working forest. This program is to provide existing and future recreation users with safe, enjoyable, high quality recreation experiences by providing good people management along with well designed, durable, low amenity facilities.

We realize rocky roads are not as enjoyable of a riding experience as a trail and that pit run roads are even less enjoyable. However, many of the trails used by OHV riders are established on road beds built during the salvage of the Tillamook Burn. As the forests along these old roads mature, they require management. So many of these old road beds will be rebuilt and used again for harvest operations in the future.

Since the Tillamook Forest is a managed forest, there will be instances when timber harvest operations and OHV trail use are in conflict, at least temporarily. Whenever possible, existing designated recreation trails will be protected and restored. But in some instances, to minimize the impact on the forest resource, road and trail building must be limited, and sometimes this will mean sharing the same location.

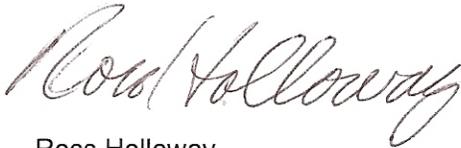
ODF foresters and recreation staff are exploring methods which will allow the use of old roads for motorized users, which can subsequently be used as needed for timber harvest in the future, but then restored to a stable motorized trail afterward. We also manage an extensive network of trails that are specifically designated for motorized users. These are designed to meet the needs of a variety of abilities and objectives. We have worked hard with a variety of motorized user groups to design this network.

Our recreation unit works with volunteer groups to direct their efforts towards trails that are planned and designed to be low risk to the forest resources and will be able to be maintained and a part of the forest trail system for years to come. Many of these trail locations have been identified in the Tillamook State Forest Recreation Action Plan 2000.

Not all of the trails on old logging roads however, have been mapped or identified across the Tillamook, and we acknowledge that there are more opportunities out there, which we try and identify when we can. We would like to invite you to work with our recreation unit to address your concerns and the motorized objectives you enjoy pursuing so that we might incorporate your concerns into our annual planning.

Thank you again for your comments. I hope we have adequately addressed your concerns.

Sincerely,

A handwritten signature in cursive script that reads "Ross Holloway".

Ross Holloway
District Forester/Tillamook