

March 2, 2008

Oregon Department of Forestry
Planning Specialist
2600 State Street
Salem, Oregon 97103.

Re: AOP FY 2009/Ridge 77

To Whom It May Concern:

I am a property owner adjacent to and south of Area 2 of the Ridge 77 sale.

Exhibit 1

I am glad see SBM being implemented in my neck of the woods, but looking at exhibit 1, I think you will have to agree with two observations:

1. The area set aside to achieve a layered canopy is puny.
2. The area is an "island" of flora, but is it useful for fauna?

I request that Area 1 be treated the same way as Area 2 to increase the utility of a layered canopy to a wider range of fauna, and in recognition and support of Old 77 Vesper Lane's classification of "Visual."

In general would like to see more consideration to keeping or creating wooded corridors to connect these islands.

Exhibit 2

If you do not grant my request in 1 above, I suggest preserving more of the appearance from the road on Old 77 Vesper Lane by creating a thinned buffer in the southern portion of Area 1.

In the southeast corner of Area 1 there is nice stand of Doug Fir that I request be reserved to meet the 5 to 7 conifer per acre standard.

The red oval in Area 2 indicates an area where a row of Doug Fir is growing at the roads edge across from power lines. To the extent and only to the extent that any could be considered serious hazards, I would endorse removing those alone.

Regards

M. A.

cc: Ty Williams, Jewell Unit Forester



Oregon

Theodore R. Kulongoski, Governor

Department of Forestry

Astoria District Office

92219 Hwy 202

Astoria, OR 97103

503-325-5451

FAX 503-325-2756

<http://www.odf.state.or.us>



“STEWARDSHIP IN FORESTRY”

May 6, 2008

Dear Mr. A

Thank you for your recent comments on Annual Operations planning for state forests. The district is reviewing your comments pertaining to the Astoria District 2009 Annual Operations Plan (AOP). Below we have itemized responses for the items which you have provided comments.

“I request that Area 1 be treated the same way as Area 2 to increase the utility of a layered canopy to a wider range of fauna, and in recognition and support of Old 77 Vesper Lane’s classification of “Visual.”

The Astoria District has approximately 30,000 acres in our landscape design with a desired future condition of layered, and an additional 36,000 acres slated for older forest structure. These acres are arranged across the landscape in a variety of patch sizes and configurations. As stated in the Northwest Oregon Forest Management Plan, Chapter 4 – Resource Management Concepts and Strategies; “A diversity of stand structures across the landscape in varying amounts and arrangements is probably the most reasonable way to provide habitats for the broad spectrum of birds, small mammals, or wildlife in general (Hunter 1990, Hanson et al. 1991, Carey et al. 1996, Carey and Johnson 1995.). Further discussion of the concepts and strategies used in the landscape design in Northwest Oregon can be found in this chapter. A map of the Astoria District’s Landscape Design is available for review at the Astoria District Office.

Area 1 is designated by our Land Management Classification System (OAR629-035-055) as “General”. Areas that are classified as “General” are not prescribed a desired future condition per se, which means that they are to be managed for a variety of integrated resource objectives and goals that are compatible over time and across the landscape. The modified clearcut prescription will also help to achieve the Astoria District’s Implementation Plan target for the extent of regeneration structure types that are to be maintained across the landscape for the benefit of species dependent upon open habitats provided by this type of harvest.

Measures will be taken within the regeneration harvest prescription and site preparation activities to ensure that the Scenic Classification and Management Objectives for the Level 2 visual classifications of Area 1 are met. These measures may include the flush cutting of stumps within 50 feet of Vesper Lane and moderating the amount of residual slash .

"I suggest preserving more of the appearance from the road on Old 77 Vesper Lane by creating a thinned buffer in the southern portion of Area 1. In the southeast corner of Area 1 there is nice stand of Doug Fir that I request be reserved to meet the 5 to 7 conifer per acre standard."

As stated previously, Area 1 is classified as General Stewardship in Astoria District's LMCS. As you are aware this unit is planned for a regeneration harvest with the Ridge 77 timber sale. Effort will be made to concentrate wildlife trees in the southern portion of the unit to create a visual buffer between Old 77 Vesper Lane and the harvest unit. This comment will be taken into account with operational feasibility and public safety concerns. Furthermore, measures will be taken within the regeneration harvest prescription and site preparation activities to ensure that the Scenic Classification and Management Objectives for the Level 2 visual classifications of Area 1 are met.

"The red oval in Area 2 indicates an area where a row of Doug Fir is growing at the roads edge across from power lines. To the extent and only to the extent that any could be considered serious hazards, I would endorse removing those alone."

Our sale prescription will require that the biggest and best trees be left when thinning the stand out to the desired basal area. Exceptions to this contract requirement are when the biggest and best trees are within designated skid roads or cable corridors or if there are safety concerns. ODF has been contacted by the Clatsop County Public Works Jewell Road Foreman who indicated that there are some trees that have identified as hazardous in the area you described. We will be working with our timber sale purchaser and Clatsop County during the operation to ensure that any of these hazard trees are removed.

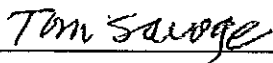
The District Forester is expected to approve the Astoria District 2009 Annual Operations Plans by June 2008. Changes to the Ridge 77 operations plan resulting from your comments will be documented in the approved plan.

Approved annual operations plans will be posted on the department's web site at [http://egov.oregon.gov/ODF/STATE FORESTS/Annual Operations Plans.shtml](http://egov.oregon.gov/ODF/STATE_FORESTS/Annual_Operations_Plans.shtml). Your comments and our responses will also be posted on the website. If this causes you any concern, please contact me immediately. Members of the public may visit district offices to see approved plans and changes, or request to have copies sent to them.

We appreciate your input in state forest planning. Active public participation helps us implement our legislative and Constitutional mandates, and the goals, objectives, and strategies in our forest management plans.

Please let us know if you have any questions or additional comments.

Sincerely,



Tom Savage
Astoria District Forester
(503) 325-5451

WELTY Roger

From: J. B
Sent: Thursday, March 20, 2008 4:58 PM
To: WELTY Roger; WILLIAMS Ty
Subject: ODF AOP Ridge 77 Comment

Hi, I would like to add my support to the comments already submitted by M A. I am copying his message here for your convenience. I live adjacent to and south of Area 1.

**Sincerely,
J. B**

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M. A

03/21/2008



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May 6, 2008



"STEWARDSHIP IN FORESTRY"

Dear Ms. B:

Thank you for your recent comments on Annual Operations planning for state forests. The district is reviewing your comments pertaining to the Astoria District 2009 Annual Operations Plan (AOP). Below we have itemized responses for the items which you have provided comments.

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Please let us know if you have any questions or additional comments.

Sincerely,

Tom Savage

Tom Savage
Astoria District Forester
(503) 325-5451



**SIERRA
CLUB**
FOUNDED 1892

Comments of D. D. F.
Oregon Chapter Sierra Club

Oregon Board of Forestry:
5 March 2008

Good Morning.

My name is D. D. F. I am the State Lands Issue Coordinator for the Oregon Chapter of the Sierra Club. We have been actively involved in the Tillamook and Clatsop State Forests for well over 10 years and our members are greatly concerned about the future of these publicly owned lands.

I have been closely monitoring the on-the-ground effects of ODF's implementation of the Forest Management Plan since it was adopted in January 2001. I am here today to convey on behalf of the Club (and its 24,000 Oregon members) the very serious concerns we have regarding the 2009 Annual Operation Plans (AOPs) recently released for public comment, particularly timber sales in Tillamook District.

We are deeply concerned that some of the current operations fail to achieve the greatest permanent value as defined in Oregon statutes and administrative rules. In particular, we feel that many of the planned timber harvests fail to meet requirements for protection of "aquatic habitats for salmonids, and other native fish and aquatic life; ...native wildlife habitats;...soil, air, and water;...and outdoor recreation opportunities" as mandated in ORS 530 and OAR 629-035. We also firmly believe that these plans are not based on the required "best available science."

Let me begin with a few facts from the Tillamook 2009 AOP:

- 1) 69% of the harvest will be by clear-cutting; that's about 3000 acres.
- 2) 8 of the 15 primary timber sales have clearcuts greater than 100 acres.
- 3) 9 of the 15 are planned to clearcut forest designated to become complex.
- 4) Plans call for thinning in a Marbled Murrelet Management Area, despite the decreasing number of marbled murrelets on ODF lands, and despite the fact that the area biologist notes this sale poses a moderate risk to this imperiled species.

Particularly alarming are operations like the Peak Out timber sale in the Kilchis basin, which plans to clearcut 119 acres of "Understory" that is designated to become layered. How does clearcutting these mixed conifer-hardwood improve forest structure? Or consider the Fitch Creek timber sale, also in the Kilchis basin, which will clearcut 534 acres in 7 different units. According to page 6 of the Fitch Creek Draft Pre-Operations Report: "The risk of landslides delivering directly from the sale to all streams is high." Why are we clearcutting this basin. The ODF states that it "is made up of steep terrain with many high landslide hazard locations (HLHL) and deeply incised high energy stream systems."



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In the Astoria District, Unit 4 of the Buzzard Ridge Combination timber sale will clearcut 99 acres of understory within the viewshed of the Spruce Run campground. Unit 4 has a "moderate" risk of landslides delivering directly into the Nehalem River.

These sales are just a few examples of the pressures to deliver more from these forests than they can bear. Most troubling, however, is the extensive clearcutting of lands designated to become complex. I ask myself, "Why is ODF clearcutting large tracts of forest that are designated to become complex forest structure?" This is what I found in the "Landscape Design" section of the Tillamook 2009 AOP. "The stands shown as complex structure were identified as having the potential to move most quickly toward complex structure." The FMP's plain language does not support clearcutting these forest. The AOP goes on to say "...stand designations are being re-assessed and will be formally modified with an IP revision."

As the ODF has stated the current Implementation Plans (IPs) are in place for 10 years. These IPs were approved 5 years ago and are not due to be "modified" for 5 years. I understand that the BOF is currently considering possible revisions to the FMP, but those revisions are neither drafted nor approved. Is the Tillamook District now ignoring the landscape design approved in 2003, clearcutting stands designated to become complex, and then saying they will change the maps at some future date?. Sure looks that way.

In summary, as I look over the many sales in the 2009 Annual Operating Plans, it is obvious that many are coming at the expense multiple values noted in the administrative rule. Forest types that are increasingly rare in the industrial tree-farms that dominate the northern coast range are being clearcut. Moreover, many clearcuts are on steep slopes above fishbearing streams. The utter disregard for landscape design shown by these proposals from the Tillamook District threatens the fundamentals of the long-term plan. These 2009 AOPs threaten ODF's social license to manage for the greatest permanent value.

Despite the harms caused by the 2009 sales at current harvest levels, the BOF is now calling for study of a 30-35% increase in revenue to the governments -- which will inevitably mean significant increases in timber harvests. There is no way ODF can do that without significantly degrading the environment. Our members will certainly oppose the expansion of even more elements of the industrial tree-farm model to these public lands.

Thank you for the opportunity to address you today.

D. F.
State Lands Issue Coordinator
Oregon Chapter Sierra Club



Oregon

Theodore R. Kulongoski, Governor

Department of Forestry

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May 6, 2008



'STEWARDSHIP IN FORESTRY'

Dear Mr. F

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"In the Astoria District, Unit 4 of the Buzzard Ridge Combination timber sale will clearcut 99 acres of understory within the viewshed of the Spruce Run campground. Unit 4 has a "moderate" risk of landslides delivering directly into the Nehalem River."

Small portions Area 4 of this sale may be visible from the very north part of Henry Rierson Spruce Run Camp Ground. The Forest Land Management Classification as required by the Northwest Oregon State Forests Management Plan (FMP) classifies this area as "focused" visual which requires additional thought and planning with regard to the visual outcome of the harvest. Approximately 200' of scenic buffer will be left from the bank of the Nehalem River to the edge of the harvest unit. In addition, green tree retention areas and wildlife trees will be strategically placed to minimize visual impacts.

A "moderate" risk is defined in the FMP as an area that has the "potential to deliver but likelihood is low". It is stated that during sale layout, these sites will be evaluated and the geotechnical specialist will be consulted. It also defines the risk in question as being the likelihood that the delivery of soil into an aquatic system would occur if the slope were to fail. During sale layout, any areas within the unit found to have evidence of a past landslide or the potential for one, the geotechnical specialist will be consulted. All Oregon Forest Practice Act and FMP stream protection rules will be followed for the protection of the Nehalem River.

The District Forester is expected to approve the Astoria District 2009 Annual Operations Plans by June 2008.

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Sincerely,

Tom Savage

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