

Oregon Department of Forestry
92219 Highway 202
Astoria, Oregon 97103-8531

I have some concerns about tow of the possible projects for 2010.

First Sprague's Stump that is proposed to be logged. Areas 1, 2 and 4 contains many valuable animal habitat areas. This area has the last remaining open grass areas that you have not already disturbed and these areas are important to elk. All of the other open areas except the large field along Northrup Road have either grown in or have been destroyed by logging from Foster Mainline to hwy 202. One of your proposed roads in area 2 goes right down the middle of several meadows. You also plan to put a road next to a fern flat that is used by deer, elk and many types of birds. There is a large area that is a shallow lake in the winter into the summer time, in fact there is water in it most of the time all year around. There are also several other small ponds that are in the region. As a rule there is little game usage in the Northern part of 4 but as you get closer to the Horse trail that you just put in the usage increases greatly. If there was any question about if this area gets used by animals all you would have to do is look up, there are at least three old tree stands. There are several trees that show current usage. Areas 1 and 2 also provides many different types of tree ages and species that provide different habitat structures for all species. Please consider trying to preserve this unique area.

Second is Foster 40 this area several interesting features. There are several places that part of old trestles still remain and they should be preserved. That brings up the second thing and there is the remains of a wrecked train in the proposed area to be logged.

L. D.



Oregon

Theodore R. Kulongoski, Governor

Department of Forestry

Astoria District Office

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"STEWARDSHIP IN FORESTRY"

June 8, 2009

Dear Mr. D:

Thank you for your recent comments on our Annual Operations planning for state forests. The district is reviewing your comments pertaining to the Astoria District 2010 Annual Operations Plan (AOP). Below we provide responses to the concerns you raise in your comments.

Sprague's Stump:

Concerns regarding, valuable animal habitat areas for elk; disturbance of open grass areas, ponds, and meadows used by deer, elk, and birds.

As you are likely aware, we attempt to manage for a variety of wildlife species and their habitats. Those known to occur on the Clatsop and Tillamook State Forests are listed in Appendix E of our Northwest Oregon State Forests Management Plan, which can be accessed at the following website:

http://www.oregon.gov/ODF/STATE_FORESTS/nwfmpl.shtml.

For wildlife species designated with a threatened, endangered, or sensitive status we employ measures that limit activities within known occupied habitats. These measures have been developed with the intent that they meet or exceed requirements of the federal and state endangered species acts. Our in-house wildlife biologist for Northwest Oregon in cooperation with the Oregon Dept. of Fish and Wildlife, and the U.S. Fish and Wildlife Service guides us in the application of conservation strategies that insures we meet the obligations of those laws.

For species with 'other' non-status designations, on that list such as State Game species we practice what is known as Structure Based Management, which is defined in the Landscape Strategies of our Northwest Oregon State Forests Management Plan. The Landscape Strategies and Structure Based Management are intended to provide diverse habitats for the many species that live in the forest by creating and managing an array of young, middle-aged, and older forest stand types including non-forest patches. To achieve this array of stand types the District prepares a combination of sales that include both thinning and modified clearcuts. The location and extent of these harvest types is determined by considering specific site conditions within individual stands, and the objectives identified in the District's 10-year Implementation Plan, which defines how the goals and strategies

of the Northwest Oregon State Forests Management Plan (hereafter referred to as the Plan) will be achieved.

Although the Plan does not stipulate it we try to disperse planned operations around the District so as not to have concentrated harvest in one area over successive years in an attempt to minimize disturbance to certain habitats. Generally, unique habitats such as small meadows or wetlands less than several acres in size are identified during reconnaissance efforts, so that as planning continues over the course of a two-year time frame we collaborate with our wildlife biologist and/or the Oregon Dept. of Fish and Wildlife and inquire as to the function and value of these kinds of patches, and the level of protection they should be afforded in the context of overall habitat conditions in the surrounding northwest portion of the country. For this particular sale, wildlife biologists did not make specific note of the meadows' importance to local big game herds or other species.

As the plan for the Sprague's Stump sale becomes more complete, consultation with wildlife biologists and resource specialists will continue, so that the importance of the local features you have highlighted can be taken into further consideration. We realize that the area is used regularly by big game and other species, as well as by humans; and is popular with hunters. District knowledge of the area reveals that some of the small meadows in the area were created as a result of an experimental cattle and sheep grazing project between 1937 and 1951. The project was organized and ran by Oregon State University.

One strategy that we implement with our modified clearcuts is to retain on average five or more green trees per acre standing. These do not have to be evenly distributed. They can be clumped or arranged in any configuration necessary to meet resource concerns. For the meadows you speak of, leave-trees can be arranged to provide a buffer around them to minimize disturbance. Additionally, our initial plan does not currently propose to construct a road segment through a meadow; we intend to avoid them as much as possible. Your intimate knowledge of this local area helps us to remain vigilant of those considerations. For lakes, ponds, and wetlands of sufficient size that may lie within a harvest area, we will implement the protection measures and buffer prescriptions listed in the Plan's Appendix J of the Plan. These are intended to prohibit or limit harvest related activities in wet areas, protecting them from unwanted impacts.

Foster's 40:

Remains of old trestles and a train within the areas to be operated within.

The information you have provided has been forwarded to our staff Public Use Coordinator who is in charge of the Department of Forestry's cultural resource inventory. He has recently conducted a full inventory of all the known cultural sites and artifact locations that we know of on state forestry managed property. We do know that the Big Creek Lumber Company operated in the vicinity of this sale. Field reconnaissance of the entire sale will be done during FY10. Any artifact that requires protection will be appropriately protected at that time.

Conclusion

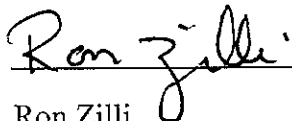
Once the public comment period has ended, the District Forester will review all comments received. The final AOP is expected to be approved prior to June 30, 2009.

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. Your comments and our responses will also be posted on the website, with your name and address removed. 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,

A handwritten signature in cursive script that reads "Ron Zilli". The signature is written in black ink and is positioned above a horizontal line.

Ron Zilli
Acting Astoria District Forester
(503) 325-5451

Pacific Rainforest Wildlife Guardians

Clatsop County

RAPID REWARDS -

AREA 4 - concerns me and it should be changed to a suspension thin. It is steep and above the Nehalem River which has drastic pollution and threatened salmon problems already. The Nehalem is temperature impaired. There is a stark lack of native vegetation thought most of the valley. The steep slope is valuable if shaded by a light thin that does not contribute additional herbicide or silt runoff into the river. The protection of the micro-climate is crucial in keeping ambient air temperatures from increased excess. The sub soils are highly silty and prone to sliding. Please do not allow cutting machines or clearcuts above the Nehalem. Area 4 is also visually sensitive from State Highway 202.

Area 2 that includes the steep portion as well. There are not enough standing snags or downed wood for the ecosystem of Northern Spotted Owls. This could be prime feeding habitat if enough vision and sensitivity is put into the design. Spotted owls have an advantage over Barred Owls by preferring steep slopes, and previous use of the area should be kept in mind in the design. Such diversity of vegetation must be maintained and enhanced by avoiding ground disturbance and need for herbicide from clear-cutting. This region is highly important to the recovery and maintenance of all wild life forms, having been abused by over-logging in the greater area.

A 35 density thin with small patch cuts would be more suitable at Rapid Rewards. Deep seated landslide formations should never be clear-cut. They often lack enough quality top soil as it is for high quality tree production. Such places should grow alder among conifers to maximize top soil development, soil-loss prevention and increase the size of standing timber with full winter sun when alder leaves blanket the ground preventing erosion.

As is, this sale poses unacceptable risk of herbicide, heat and silt pollution to threatened Coho Salmon of the Nehalem River and tributaries and must be changed to eliminate the threat of take to listed fish and to enhance the future of spotted owls. This sale holds the prospect of a thoughtful and creative timber sale that could be beneficial with careful changes. It must be changed, however, to prevent take of Coastal Coho and to provide feeding habitat for spotted owls. Benefits of careful ecological enhancement would be greater timber production while leaving a smaller footprint. It could be a shining example of diverse forest and soil development that protects air, soil, water and wildlife for all Oregonians throughout the future by more snags, downed wood, trees and adjustment.

Sincerely,
M.D.



Oregon

Theodore R. Kulongoski, Governor

Department of Forestry

Astoria District Office

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Astoria, OR 97103

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"STEWARDSHIP IN FORESTRY"

May 1, 2009

Dear M . D:

Thank you for your recent comments on our Annual Operations planning for state forests. The district is reviewing your comments pertaining to the Astoria District 2010 Annual Operations Plan (AOP). Below we provide responses to the concerns you raise in your comments.

Rapid Rewards:

Concerns regarding Area 2 & 4; steep slopes, clearcutting, visually sensitive from Highway 202, Northern Spotted Owl habitat, and adjacency to the Nehalem River.

- The Rapid Rewards sale has been reviewed by the staff geotechnical specialist for slope stability and landslide risk. Consultation will continue if there is any additional evidence encountered during sale layout that warrants further consideration.
- All four areas within the Rapid Rewards sale are planned to be partial cut units which will be thinned to promote and hasten the development of layered complex structure intended to provide future older forest habitat. The target species is second-growth Douglas-fir. A diameter limit will be imposed to keep the larger 18"-20" dbh trees in the stand. All hardwoods and other minor species (such as young, unmerchantable shade-tolerant western hemlock) will be reserved. Snags are always reserved unless they are deemed a safety hazard to loggers.
- Areas 2 and 4 are partial cut units that are visible from Highway 103. Highway 103 is not an Oregon Scenic Highway as defined by Revised Statute, however a partial cut or thinning prescription is intended to provide a secondary benefit of minimizing visual impacts.
- This sale has been surveyed according to ODF policy requirements and survey protocols for two years for Northern Spotted Owls (NSO). There were no responses during the two years of surveys; indicating that these stands are not sufficiently crucial to NSO use in their present condition. The Desired Future Condition of these stands however, is to become older complex forest which is better suited as NSO habitat. Conservation strategies to be applied as features of this sale also must be in accordance with our 1999 draft Habitat Conservation Plan, local agreements with the U.S. Fish and Wildlife Service, and our 'take-avoidance policy. Our staff

biologist has been coordinating with sale planning to ensure that the proposed operations are consistent with those strategies.

- The Nehalem River is a Large, Type F stream and will be protected by the aquatic and riparian strategies defined in Appendix J in the Northwest Oregon State Forests Management Plan, January 2001.

Conclusion

Once the public comment period has ended, the District Forester will review all comments received. The final AOP is expected to be approved prior to June 30, 2009.

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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,



Ron Zilli
Acting Astoria District Forester
(503) 325-5451

cc: ~~State Forest Operations Coordinator~~; NWOA Planning Coordinator; Astoria Planning and T&E Species Coordinator