

## **PUBLIC COMMENT PROCESS FOR THE 2006 ANNUAL OPERATIONS PLAN**

The Oregon Department of Forestry issued a Press Release on February 7, 2005, announcing a formal 45 day public comment period for the 2006 Annual Operations Plans from February 14 through March 30, 2005.

The Annual Operations Plans represent a district level planning process which must be developed in accordance with the four Forest Management Plans (FMPs) and the seven district Implementation Plans (IPs) that provide the direction and objectives for management of State Forests on nine ODF districts. (The Elliott (Coos) and Sun Pass (Klamath-Lake) State Forests operate without IPs.) These district-level Annual Operations Plans (AOPs) describe the proposed on-the-ground operations, such as timber sales, road building, reforestation, stream enhancement projects and trail building, scheduled for the coming fiscal year that begins in July. The district forester approves the final plan for each district after any adjustments are made as a result of comments received during the public comment period.

The purpose of the Public Comment Period was to provide an opportunity for the public to review the AOPs, ask questions and offer comments. As a public agency, ODF operates in the best interest of Oregonians, conducting business in an open way with opportunities for scrutiny to foster and maintain public confidence that ODF operations are benefiting Oregonians.

Past experience has shown that public comments have the potential to improve plans, so the objective was not only to inform the public, but to receive feedback that would help to clarify the AOPs, improve their consistency with the long range FMPs and IPs, and to become aware of any new information that could affect a planned operation or improve its efficiency or effectiveness.

At the end of the public comment period, the districts and ODF headquarters in Salem had received approximately fourteen individual documents (letters, faxes and e-mails). Comments were received from twenty-seven different sources including the State Forest Advisory Committee (SFAC), seven environmental groups outside the SFAC, one District AOP Focus Group, one sawmill, one former employee, one City government, and members of the general public. Once they were carefully reviewed, it was found that these documents contained nearly 180 individual statements, which consisted of comments, questions, opinions and recommendations.

Since the AOPs are a district level planning process, each district was responsible for using a common process to evaluate the statements specific to their AOP. Approximately 25 percent of the statements were addressed to all state forests. They were evaluated by Area and Salem staff.

The common evaluation process consisted of the following six steps:

1. Review each document to identify the individual statements.
2. Summarize each statement in a table.
3. Evaluate each statement (What activity is it related to? What is its scope? How does it relate to the AOP?)
4. Respond to the statement in a table. The response is a very brief synopsis of how the district intends to change the AOP based on the statement, or it provides an explanation of how the planned activity is consistent with the FMPs, IPs and other policy or regulation.
5. After the initial evaluation and response to the public comments, representatives from all state forest districts met to compare their evaluations and responses. The purpose of the comparison was to ensure consistency in the evaluation and response to statements between districts, and to seek out statements that should be applied to all district AOPs.

6. Revise district evaluations and responses to statements, then revise the district AOP based on the district responses.

The Annual Operations Plans fall in the fourth and lowest level of formal planning on state forests. They must be conducted in accordance with the parameters set forth in the districts' Implementation Plans, the Forest Management Plans and the 'Greatest Permanent Value' rule (listed from low to high level of planning). Administrative rules prevent districts from adopting recommendations inconsistent with the FMPs and IPs. Thus, an important part of the evaluation process was the use of a set of evaluation criteria. These five criteria were used to determine if and how a statement was related to the AOP. Each statement from the public comments was evaluated with the following criteria:

- Does the statement enhance the consistency of the AOP with the FMP?
- Does the statement enhance the consistency of the AOP with the IP, for those districts with IPs?
- Does the statement improve the clarity of the AOP?
- Does the statement provide new information that will affect the AOP or an operation?
- Does the statement improve the efficiency and effectiveness (or outcome) of the AOP?

Those statements that fell within the criteria above received responses that indicated how the district's AOP would be changed to incorporate the comment. Those that did not meet the criteria above, but expressed opinions, concern or issues related to a higher level of planning (FMPs and IPs) received responses that provided the commenter with an explanation of how the planned activity is consistent with the FMPs, IPs and other policy or regulation. The districts may still consider statements that apply to other planning processes when they revise their district Implementation Plans, Recreation Plans, Transportation Plans, or other plans.

Note: A complete listing of all public comments related to the district FY06 AOP can be referenced at our web site:

[http://oregon.gov/ODF/STATE\\_FORESTS/planning.shtml#Public\\_Comments](http://oregon.gov/ODF/STATE_FORESTS/planning.shtml#Public_Comments)

### **Coos District FY06 AOP Changes Resulting from Public Comment Process**

The following changes were made to the FY06 AOP since the end of the public review period (March 30, 2005). These revisions were a result of further analysis by district personnel. The AOP narrative summary, the summary tables, and the Pre-Operations Reports have been updated to reflect these changes.

- ◆ Information on Integrated Pest Management and the District's noxious weed strategy has been added to the AOP summary.
- ◆ A statement, clarifying the District Procedures concerning reserving old growth. has been included in the AOP summary document.
- ◆ Fish Cougar Divide has been split into two sales with separate pre-sale reports: Fish Divided and Cougar Divided.
- ◆ A statement has been added to the Fish Divided pre-sale report specifying a 30 foot buffer of leave trees around the rock cliff.

- ◆ A statement has been added to the Fish Divided pre-sale report specifying that a full spanning tank trap will be constructed across spur roads in proximity to streams.
- ◆ A statement has been added to the Mill Creek Bridge #2 pre-sale report specifying a buffer of green tree retention trees to be left around the dispersed campground, and where feasible on high visibility slopes to minimize visual impact to the BLM Loon Lake Campground.
- ◆ The pre-sale documents for Mill Creek Bridge #2 and Kentucky Plantation has been corrected to refer to plantations as third growth instead of second growth.