

2007 AOP Public Comments and Responses

Astoria District

Proposed Management Prescription

COMMENT: I think it's too bad that you aren't planning to conduct partial cut harvests at a higher level. The level planned is right at the plan minimum, leaving the total planned harvest for the year on the low side of the harvest range for all types of harvest.

RESPONSE:

The partial cut and clearcut acres for this AOP are within the approved Astoria District Implementation Plan estimated annual acres.

COMMENT: Porter Horse Area 6 and 9...The older Douglas-fir leftover from the original railroad logging should not be cut. A maximum diameter limit should be utilized to ensure retention of these trees. The proposed management prescription/vision says the limit “may” be utilized. Please change the wording to make clear these older trees will be retained.

RESPONSE:

This sentence has been modified to more clearly state the intention.

“A maximum diameter limit and/or other prescriptive methods will be utilized to ensure the retention of the older cohort of Douglas-fir along the Horseshoe Camp Road.”

COMMENT: Porter Horse... It is not right to take once contiguous area of clear cutting....This is an illegal 469 acre clear-cut, not a partial cut in any area, both from the standpoint of begin oversized and from falling 39 acres short of 10% left for wildlife habitat in the net cut.

RESPONSE:

This sale has 317 acres of partial cut in four different sale areas and 155 acres of modified clearcut in four other non-contiguous sale areas. This sale will meet the NW Forest Management Plan landscape level snag, green tree and downed wood requirements, as well as the Forest Practices Act.

COMMENT: Porter Horse...No mention is given to extending buffer protection to Area 1 other than the sale being kept away from the stream at the lower end and “stringers in the draws” that would blow down....No requirement is stated for bypass diversions of stream water while culverts are being installed in the spawning grounds.

RESPONSE:

All streams within Area 1 flow into the East Fork of Plympton Creek and are not within the Fishhawk Lake Creek Salmon Anchor Habitat area. All streams will be buffered as directed by the NW Forest Management Plan Aquatic and Riparian Strategies. The planned new road locations are along ridgetops and do not require any “live” stream crossings. If stream crossings are required, they will be installed during periods of low water flows as described by the Oregon Department of Fish and Wildlife, “Oregon Guidelines for Timing of In-water Work to Protect Fish and Wildlife Resources,” and also in accordance with specifications in the ODF “Forest Roads Manual” and Forest Practices Act.

COMMENT: Porter Horse...Area 1 – The management prescription/vision says, “the biggest and best trees will be retained regardless of species, including alder. How is this determined, by whom, and what steps are taken to ensure that these trees are preserved?”

RESPONSE:

This sale area is planned to be an “auto-mark” partial cut. The operator selects the trees to fall, as defined in the thinning specifications portion of the contract. The contract administrator works with the operator to ensure that all felling requirements are adhered to and within contractual specifications. The contract administrator directly oversees the quality of work within the operations. If violations of the timber sale contract provisions result, then financial penalties and mitigation measures are assessed.

COMMENT: The modeled annual clearcut objective for periods 1 and 2 (1675 acres) is significantly higher than the top of the Implementation Plan (IP) range (1300 acres). In the past five years the Astoria District has clearcut an average of 804 acres per year.ⁱ This means the proposed clearcut level is almost 200% of the mid-point of the IP range. I think an increase of this magnitude in clearcut is unreasonable to consider. The Model also proposes cutting large old trees, 770 acres of stands that are older than 100 years, within the first ten years. An example is a 40 acre parcel of old trees immediately adjacent to Jewell Wildlife Meadows.

RESPONSE:

This comment is regarding the Harvest and Habitat Modeling Project Final Report presented to the Board of Forestry in March of 2006. The Board has not reached a decision as to how the modeling will be reflected in the department’s future Annual Operations Plans.

COMMENT: Then there’s the “Norruston Combination” proposed for clearcut and thinning of more than 200 acres of the Ecola Creek watershed, immediately south of Cannon Beach and within ½ mile of the Pacific Ocean.

RESPONSE:

This sale is consistent with the Implementation Plan for the Northwest Forest Management Plan on the Astoria District. The drainage in the Norruston Combination sale flows into the Fall Creek and other tributaries to the Pacific Ocean.

COMMENT: Porter Horse...There are numerous high-risk sites in the sale, but you say that a geologist won't be necessary to assess them.

RESPONSE:

There are not numerous high-risk sites in the sale. The initial assessment from the geotechnical specialist for high-risk sites throughout the sale is low. If during field work there are any concerns related to slope stability the geotechnical specialist will be consulted for further field review.

Recreation Resources

COMMENT: The management of recreation on ODF lands in the Astoria District has been an area of expressed concern over the last three years.... Clatsop County remains far, far behind Tillamook County in recreational offerings.... But I believe the Astoria District must make a serious investment in recreation in Clatsop County as a percentage of revenues drawn from Clatsop forest harvest.

RESPONSE:

The State Forest's Program is currently working on performance measures that will guide the department in evaluating recreation management. The Astoria District is monitoring the balance between development and ability to operate and maintain the current recreation opportunities to make sure the quality of recreation on the Clatsop State Forest is not lost.

Other Resource Considerations

COMMENT: Porter Horse...Only having had one Spotted Owl survey also prevents meaningful public review of impacts to threatened wildlife....Sales are sold before surveys are completed. This completely negates your cooperative agreement to do protocol surveys, by allowing harassing road building and preliminary work to begin even before surveys are done.

RESPONSE:

All sales are surveyed to the department's survey protocol prior to auction.

COMMENT: On page 21, I'm pleased to see that you plan to do a cost-benefit analysis for fertilization in the Nicolai Mountain area. It's too bad this analysis wasn't done last year, as I suggested in my comments on the FY06 plan. Those stands are presently at the perfect stage to fertilize, since commercial thinning has been completed on all of them during the past 10 years. You should not delay this analysis further, as those stands have the potential of putting on a lot of value growth over the next 20 years if fertilized now.

RESPONSE:

The cost-benefit analysis will be completed in FY07.

Other Issues

COMMENT: None

RESPONSE:
