

***Oregon Department of Forestry  
Staff Analysis and Response  
To Public Comments on the  
Draft 2011 Elliott State Forest  
Implementation Plan  
(Coos District)***

**November 18, 2011**

## Background

The public comment period for the Draft Implementation Plan (IP) began April 1, 2011 and ended August 29, 2011. Two public hearings were held in North Bend and Roseburg to gather testimony on rulemaking for the adoption of the 2011 Elliott Forest Management Plan (FMP) where comments on the IP were also accepted. A summary of public comments and sources is provided in Appendix A. Public comments on the IP covered the full range of interest, values, and support levels.

Many of the public comments also addressed the Elliott FMP that was involved in a public review process and was approved by the State Land Board on October 11, 2011 and by the Board of Forestry on November 3, 2011. Additional background and discussion about the FMP can be reviewed in two documents that were presented to the Board of Forestry and are available on the Oregon Department of Forestry's website at these links :

- *State Forester Report for Board GPV and Planning Rule Determination on the Elliott FMP*  
[http://www.oregon.gov/ODF/BOARD/docs/2011\\_November/BOFATTCH\\_20111103\\_03\\_04.pdf](http://www.oregon.gov/ODF/BOARD/docs/2011_November/BOFATTCH_20111103_03_04.pdf)
- *ODF Staff Analysis and Response to Public Comments on the Draft 2011 Elliott State Forest Management Plan*  
[http://www.oregon.gov/ODF/BOARD/docs/2011\\_November/BOFATTCH\\_20111103\\_03\\_03.pdf](http://www.oregon.gov/ODF/BOARD/docs/2011_November/BOFATTCH_20111103_03_03.pdf)

## Overview

The information in this document addresses the issues and concerns raised during the public comment period for the draft 2011 Implementation Plan. While some comments addressed the IP specifically, most comments were general in nature and covered topics that were already addressed in the two documents listed above related to the FMP. If a particular comment on the IP is not included within the 16 overarching themes below and the staff response narratives, then that topic was addressed in the staff analysis and response to comments on the FMP.

This document responds to comments by thematic categories and strives to capture the majority of concerns raised, and address common themes that emerged. Staff provided analysis of each theme and included relevant references. The comments are grouped into 16 overarching themes:

1. Monitoring and Adaptive Management
2. Definition of Advanced Structure
3. Aquatic and Riparian Strategies
4. Carbon Sequestration
5. Disturbance Events and High Landslide Hazard Locations
6. Harvest Levels
7. Forest Land Management Classification Maps
8. IP Maps
9. Activities in Certain Management Basins
10. Recreation Management and Trail Opportunities

11. Threatened and Endangered Species
12. General Wildlife
13. Scheduling and Timber Sale Size
14. Public Comment Process
15. Roads
16. Rotation Length

## **1. Monitoring and Adaptive Management**

In general, the public comments on monitoring and adaptive management repeat concerns expressed in the public comment period for the FMP. Some comments questioned the success of past implementation of adaptive management on the Elliott State Forest and lack of a monitoring plan.

### Staff Response

The Oregon Department of Forestry recognizes the concerns about implementing adaptive management on the Elliott State Forest with reduced budgets. Changes in management goals and activities can be made when necessary at the appropriate planning level, either the FMP, Implementation Plan or Annual Operation Plan. This approach requires a commitment to long-term information gathering and the incorporation of that information into the decision-making process.

In spite of programmatic difficulties brought on by reduced budgets, the ODF is committed to adapting management practices based on best available science. The new IP is strongly supported by the accumulation of years of scientific information, as well as a 10+ year track record of applying similar practices on other state-owned lands. This science is well documented in the FMP, as well as in the multiple other plans implemented by ODF across the state. The ODF plans to update the State Forests Research and Monitoring Plan in 2012 to incorporate the questions that accompany this new IP. The commitment to a research and monitoring program is described on page 55 of the IP and includes the following elements:

- Describe the general monitoring issues that are anticipated to be addressed;
- Provide the framework to aid prioritizing and developing specific monitoring projects to assess the effectiveness of the management strategies;
- Guide development of annual operations plans to support monitoring projects; and
- Describe funding mechanisms and how available funding will be prioritized among projects.

## **2. Description of Advanced Structure**

The public comments on Advanced Structure express concern that the definition of Advanced Structure is not consistent with other State Forests. Some comments expressed that either too little or too much Advanced Structure is being left on the landscape. A comment expressed concern that the percentages of Advance Structure reported from the 1995 Forest Management Plan is not consistent with the percentages reported in this IP.

### Staff Response

The three stand structures represented in the FMP is a simplified model, in reality a continuum of forest development stages exists. Advanced Structure stands that are highly diverse may develop structural characteristics linked to older forests, these stands will not necessarily emulate all the processes and functions of very old forests. However, they provide habitat for species commonly associated with older forests. (Page 4-22 FMP). The expected outcome of Advanced Structure after the 10 year IP period will be between 39% and 42%. The harvest schedule modeling predicts that after an initial small decline in Advanced Structure to 39% to 42%, there will be an increase to 50% after 30 years of FMP implementation. There is currently no research that supports one specific, idealized array of stand complexity optimal for all species. The forest will have varying percentages of Advanced Structure as a result of sustainable harvest and applying strategies for T&E wildlife, RMAs and SUVs (Steep, Unique, or Visual landscape features). The expected result of Advanced Structure is 30-50% across the forest.

The NRF (Nesting, Roosting, Foraging ) habitat used in the 1995 plan is based on age- stands equal to or greater than 80 years or older are classified as NRF. Advanced Structure used in this FMP and IP is not based on age, but on stand structure. An 80 year old NRF stand that does not have the required stand structure will not receive a classification of Advanced, but instead will be classified as Intermediate. This difference in the two classifications would account for the percent differences between the two plans. The amount of Advanced Structure on the forest will be monitored using periodic SLI inventory.

### **3. Aquatic and Riparian Strategies**

Overall the bulk of public comments on Aquatic and Riparian strategies re-state concerns registered in the public comment period for the rulemaking draft of the FMP.

### Staff Response

There is very little new information to bring to these topics related to the IP, so ODF staff analysis and response to public comments on the FMP will largely serve as staff response to this IP comment topic as well (refer to ODF Website link on Page 2).

However, in response to concerns raised in public comment on the Forest Management and Implementation Plan strategies for riparian area management, revisions were made in the Forest Management Plan which in turn are reflected on Page V of the Implementation Plan.

Aquatic and riparian systems are managed to achieve a range of desired future conditions. Management standards include site-specific provisions for establishing 160-foot RMAs, and describe how management will occur in these areas. Because vegetation in the near stream area has a relatively greater role in supporting riparian functions and processes, a high priority is placed on management decisions in this area. The revision emphasizes that if mature forest conditions exist within 100 feet (inner zone) of Type F and Large and Medium Type N streams then no management will take place in this zone. Additional trees

will be left beyond 100 feet to comply with all leave tree requirements for the full riparian management area (160 feet). In general this will result in at least 100 foot no-harvest zones along all Fish and Large and Medium Non-fish streams when mature forest conditions exist or management is unlikely to expedite the creation of mature forest conditions.

#### **4. Carbon Sequestration and Global Warming**

Concern was expressed that the plan does not take advantage of state forests as carbon sinks to reduce greenhouse gases and to benefit from carbon offset markets.

##### Staff Response

State Forests, as currently managed, provide carbon sequestration. Our research shows that it is very unlikely that state forests can benefit in significant ways from carbon offset markets.

The Department recognizes the increasing importance of greenhouse gases, including carbon dioxide, and their potential effects on climate and the environment. As responsible stewards of Oregon's forests, staff are monitoring information available related to greenhouse gas-related effects of our operations to the best of our ability. However, current staffing capacity (revenue limitation) does not provide detailed analyses of all of our operations. Future harvest modeling will include carbon sequestration, so that there is data available to inform future decisions regarding State Forests management.

The U.S. Fish & Wildlife Service and Ecotrust, in cooperation with the ODF and the DSL, recently took a detailed look at carbon storage and carbon storage potential on the Elliott. The 2010 study of carbon storage on the Elliott State Forest estimated the carbon inventory to be about 24,500,450 metric tonnes of CO<sub>2</sub>-equivalent (tCO<sub>2</sub>e) (Davies, B. et al., 2011). The study conducted an analysis that estimated if left completely unharvested, by 2050 the Elliott could accumulate additional storage of the carbon dioxide equivalent equal to 68.5 percent of the annual emissions of greenhouse gasses for the entire state of Oregon in 2007. Applying the same calculations to what would occur under the draft FMP would result in additional storage of about 50% of those emissions. (Under the current HCP approximately 56% of those emissions would be stored, extrapolating from this study.) Under any of these scenarios the Elliott State Forest is, and will continue to be, a significant contributor towards carbon storage in Oregon. Carbon storage levels will increase over time under the draft FMP.

Page 56 of the IP details the work that ODF will initiate as part of the research and monitoring plan to be developed in 2012:

- Establish a carbon inventory for the Elliott State Forest;
- Establish baselines and calculate both long-term and intermediate outcomes for carbon storage based forest management strategies;
- Determine net effect of management activities on carbon stocks.

## **5. Disturbance Events and High Landslide Hazard Locations:**

Comments urged the IP to describe a provision for rapid response to disturbance events to recover revenue and protect asset value, and to allow adjustment of management actions in response to catastrophic events. A comment expressed concern that harvests on steep slopes increased the risk of landslides. A comment addressed concern that windthrow is a significant threat to green tree retention, and that harvest plans should be developed to mitigate windthrow.

### Staff Response

In the event of a major catastrophic disturbance, the FMP specifies that prompt salvage operations will be conducted to prevent build-up of epidemic insect populations and to minimize economic loss. The FMP is a strategic document and provides the flexibility to adjust management actions in response to changed circumstances such as major disturbance events. Generally, the Annual Operations Plan, not the IP, addresses the District's response to natural disturbance events.

Generally, road-related landslides tend to be larger than other types of landslides, and therefore produce the most off-site effects. Reducing the number of landslides caused by roads is an important goal in the Elliott State Forest. The district's program of road design, construction, and maintenance practices has proved successful in achieving this goal. High landslide hazard locations are identified in the annual operations planning process, and the risk to downslope resources from land sliding is evaluated by the ODF's geotechnical specialists, prior to any road construction and harvest activities. Harvest practices in the Elliott State Forest are conducted with the intent of minimizing site disturbance, and providing a source of large wood in potential debris torrent tracks for aquatic habitat.

The local chapter of SAF recommends the following Forest Service publication: PNW-GTR-244-“Wind in the Forests of Southeast Alaska and Guides for Reducing Damage” as guidance to reduce losses due to windthrow. Strategies (including recommendations from PNW-GTR-244) to reduce losses of green tree retention and adjacent stands to windthrow will be implemented at the AOP level.

## **6. Harvest Levels**

Comments ranged from expressing this was a shift to maximize timber revenue, to concerns that increased harvest levels would have a negative impact to other forest values. Other comments offered support of higher levels of harvest and suggested focusing efforts on the surplus inventory in understory stand structures.

### Staff Response

The IP represents a sustainable harvest level. The harvest models are designed to achieve goals for sustainable even flow timber harvest volume consistent with the principles and management strategies

described in the FMP. The district produced an opportunity analysis confirming that an average volume of 40 MMBF per year is achievable. The district opportunity analysis ground truthed the model outputs and considering factors that could not be modeled due to lack of data. The 40 MMBF average expected harvest output represents the balance attained by incorporating the FMP strategies as compared to the estimated growth reported in a study by Mason, Bruce, & Girard of 75 million board feet per year if the forest were managed purely for volume growth.

## **7. Forest Land Management Classification Maps**

Concern was expressed that the intended use of these maps were not explained, and there was no description of how they were created. One comment was directed at how the FMLC relates to the IP.

### Staff Response

The FLMC maps describe the management emphasis of state forest lands into the three stewardship classes. The goals and strategies in the FMP determine the management of key resources, the identification and mapping of the FLMCs are based on criteria in the plans. Prescriptions are not part of the FLMC, but based on the goals and strategies of the FMP.

## **8. IP Maps**

General comment that the expected outcome map did not clearly delineate harvest areas for the 10 year IP. One comment expressed concern that areas represented on the expected outcome map as Advanced Structure, are currently planned for harvest.

### Staff Response

The expected outcome map broadly represents a potential distribution of stand structures based on modeling assumptions and an inventory based on standing timber at that point in time. Due to continued survey for T&E species, the location of harvest units will be developed at the AOP level.

## **9. Activities in Certain Management Basins**

Overall, comments expressed concern that harvest will increase in management basins that were designated as long rotation basins in the 1995 HCP. Additional concerns were expressed that increasing harvest in the west side of the forest will impact the Tenmile watershed, as well as increase public safety and water quality concerns to the adjacent landowners. Several comments focused on management in the parcels located near South Slough.

## Staff Response

The take avoidance strategy of this FMP and IP will provide more harvest opportunity in areas of the forest that had previously been constrained in the HCP. Harvest will be dependent on owl circle locations, the amount of available habitat within owl circles and the location of marbled murrelet management areas

The aquatic riparian strategy and HLHL polices, and forest practice domestic water source rule will be applied.

Two of the three scattered tracts within the South Slough National Estuarine Research Reserve (SSNERR) are in the process of being transferred to SSNERR and will not be logged under the proposed FMP. The remaining scattered tract parcel, which is located outside of the boundary of the SSNERR is available for management under the FMP.

## **10. Recreation Management and Trail Opportunities**

Recreation related comments were mainly focused on providing additional opportunities for non-motorized trails and concern about the Department's lack of control over OHV use.

## Staff Response

The department values opportunities for recreation, including non-motorized trails, and strives to provide these opportunities within the constraints of limited staff and resources. Recreational use of the forest will be managed to minimize adverse impacts on other resources, such as water quality. Specific actions to respond to unacceptable levels of resource impacts, such as those caused by OHV use, will be identified and scheduled in the Annual Operations Plan.

## **11. Threatened and Endangered Species**

The comments reiterate the same two themes in the area of threatened and endangered species that were raised in the comments on the draft 2011 FMP. A number of comments support discontinuing the HCP and the use of a take-avoidance strategy to meet the requirements of the Endangered Species Act, which is used on other Oregon State Forests and private lands. A second set of themes supports keeping the HCP, questions the legality of terminating the HCP, requests an explanation of the take-avoidance strategy, and requests clarification of the ODF's implementation of the federal Recovery Plan for the Northern Spotted Owl. There is very little new information to bring to these topics related to the IP, so

ODF staff analysis and response to public comments on the FMP will serve as staff response to this IP comment topic as well (refer to ODF Website link on Page 2).

## **12. General Wildlife**

Concerns were expressed that the IP discusses control methods for problem bears and beavers.

### Staff Response

Currently, black bears are not considered to be a concern in regards to plantation damage on the Elliott. Other landowners in southern Oregon have had significant bear damage. Since plantation damage by bears is thought to be a learned behavior, the state plans to work with ODFW to address bear damage concerns as soon as possible once signs of significant damage are discovered.

Beaver dams are considered important in Coho restoration. Beaver removal and relocation efforts will be consistent with state statute and ODFW administrative rules and regulations. When moving beaver for restoration purposes the ODFW Guidelines for Relocation of Beaver in Oregon will be followed.

## **13. Scheduling and Timber Sale Size**

This comment addresses the impact of timber sale size and scheduling on the diversity of purchasers.

### Staff Response

Timber sales will continue to be offered throughout the year. Timber sale sizes will vary in size - given topographic limitations and T&E restrictions- to facilitate economic diversity.

## **14. Public Comment Process in regards to Neighboring Landowners**

This comment expresses concern that the current public comment process does not adequately alert neighboring landowners to planned activities.

### Staff Response

The Coos District will develop a process to directly contact adjacent landowners prior to the official AOP comment period as well as prior to harvest and reforestation activities.

## **15. Roads**

A comment indicated that the IP Section describing potential road activities should add the significant tasks of procuring road rights-of way, easements and share costs. A concern was expressed that the concept of “closed road in-storage” was not included in the road management options.

### Staff Response

The information regarding potential road activities was added to the IP on page 29.

ODFs Forest Roads manual and policy has two relevant definitions: Road Closure – limiting access while keeping the road in useable condition. Road Vacation – Vacating a road is a semi-permanent/permanent technique that if done properly, completely eliminates the need to maintain a road. ODF intends to implement both strategies, road closure being the most common.

## **16. Rotation Length**

This comment expressed concern that the rotation length has a powerful effect on forest conditions and would like to see a discussion of the rotation length and factors used to determine the rotation length in the IP.

### Staff Response

The harvest model was designed to achieve goals for sustainable even flow timber harvest volume consistent with the principles and management strategies described in the FMP. Rotation length was not a goal used for harvest modeling but rather a product of the goals and constraints. The model outputs indicate that the average age of regeneration harvest will be approximately 65 years after 30 years of FMP implementation.

## Appendix A. Summary of Public Comments

### **Written Comments from Organizations**

#### ***Cascadia Wildlands (Francis Eatherington & Josh Laughlin)***

- Also representing Oregon Wild, Center for Biological Diversity, & Klamath Siskiyou Wildlands Center
- Opposes approval of IP
- No monitoring plan included in IP
- Riparian protections are inadequate
- Clearcuts allowed within HLHL above private property
- ODF broke HCP promises for NSO
- Plan not supported by science
- Clearcutting of old trees
- Plan lacks carbon emissions accounting
- Plan would log critically important “scattered tract” parcels (such as South Slough)
- Their 35-page comment letter was organized into 17 issue topics

#### ***Associated Oregon Loggers (Rex Storm)***

- Generally supports IP approval with some concerns
- IP fails to program a managed response to an estimated probability of natural disturbance
- Strategies for special areas likely to prove unduly limiting
- Need for greater clarity and more discretionary range of opportunity needed for managers
- Offer a wide range of timber sale sizes, including more small sales under 1MMBF

#### ***Coos Chapter of Oregon Society of American Foresters (Darren Mahr)***

- Support approval of the IP
- Also support harvest levels proposed but feel the rationale, assumptions, and modeling constraints should be clearly and succinctly explained
- Prefer the use of the term “commercial thinning” rather than “partial cut”
- Recommend that an assessment of potential windthrow be done for each management basin

#### ***Rosboro (Gene Stevens)***

- Supports approval of IPs
- The wise and sustainable harvest of forest resources is a true win-win for all
- Money does grow on trees in Oregon!

## **Written Comments from Individuals**

### ***Marnie Allbritten***

- Concerned about the decline of spotted owl numbers during past 20 years
- “Outraged” that Oregon would entertain a revised plan that offers even less protections to spotted owls
- Providing a “pittance” of dollars for schools should not justify such biological irresponsibility
- Suggests the process should be halted until sound science has ascertained that spotted owl and marbled murrelet populations have stabilized for at least ten years

### ***Wolfgang Schwarz***

- “I’ve lived up the West Fork, surrounded by the Elliott for around 35 years, and I am concerned
- Have you fully assessed the forest’s real value?
- Allow biodiversity to happen
- Concerned about heavy winter rains and runoff
- Excessive clearcutting is destroying the natural ecosystem on the West ForkConcerned about the decline of spotted owl numbers during past 20 years

### ***Leo Naapi***

- Supports approval of the IP
- Concerned about organizations that are trying to “shut down” logging
- Supports increased harvest levels and more funding for schools

### ***Dennis Morgan***

- The IP lacks enough information to properly understand the proposed activities. Specifically for harvesting and road building
- The plan needs to provide more information on the firewood program
- Consider beavers an enhancement and find ways to adjust boundaries of reserve areas to accommodate them
- Study different ways to harvest the forest besides regeneration

***James Nielsen (his written comments are an addendum to his oral testimony to the SLB on July 22 – see below)***

- Supports plan approval
- Disagrees with oral testimony that was given at SLB meeting that claimed the Elliott was the (worst managed) of many national forests
- Supports maximizing revenue from the ESF
- The IP lacks enough information to properly understand the proposed activities. Specifically for harvesting and road building

**Oral Comments During Public Meetings/Hearings**

***James Nielsen (Oregon Society of American Foresters)***

- Supports approval of IP
- Believes the IP is consistent with the position statements of the Oregon Society of American Foresters
- Testimony served as a preface to ODAF's formal written comments above from Darren Mahr

***Dennis Morgan (self)***

- Additional input to his written comments above
- Concerned about changing plans in the middle of the long term recovery plan for spotted owls
- Try implementing strategies on a partial area rather than the entire Elliott

***David Monett (Monett Logging, Inc.)***

- These forests need to produce and get funding support for schools
- Should be logging the maximum yield
- Put people first
- Mr. Monett appears to support approval of IP

### ***Tenaya Gilman (self)***

- Concerned about the level of clearcut harvest
- Also harvest levels impact on wildlife

### ***Francis Eatherington (self)***

- Provided additional input to Cascadia Wildlands' written comments above
- Confused about harvest level targets
- Questioned the true CSF mandate
- Breaking of 1995 HCP promises

### **E-mail "Form Letter" Campaign**

- A total of 87 e-mail messages were sent to the "ODFSTATEFORESTSCOMMENTS" address. Every message has been read to find unique comments, however all were identical and stated the following:
- Opposes approval of the FMP and the IP
- Summary of Concerns
  - Plan breaks the promise of 1995 HCP
  - Doubling the rate of clearcutting old, native forests
  - There is no monitoring plan
  - The plan uses strategies that NMFS and IMST found faulty
  - More emphasis on carbon storage and other revenue raising opportunities