

2006 AOP Public Comments and Responses

All Districts

Proposed Management Prescription

COMMENT: Why regen harvest in areas scheduled for complex structure; review requested.

RESPONSE: Current stand condition is an equal determinant to the DFC of a stand when selecting the silvicultural practices to be applied. Stands impacted by Swiss needle cast infection, overly dense stands (poor height to diameter ratio) and/or single species, one story stands are some of the reasons stands with a DFC of OFS may be planned for regeneration harvest. Partial harvest in these stands will not produce the necessary response to develop all the characteristics that define complex structure. Structural components, such as remnant old growth trees, residual live trees, snags and down wood are retained to help achieve complex structure as soon as possible in the new stand.

COMMENT: Save our State Forests from being cut and turned into tree farms

RESPONSE: Oregon's State Forest Lands are actively managed "to secure the greatest permanent value of such lands to the state" by protecting and enhancing fish and wildlife habitat, water quality, recreational opportunities and scenic values, as well as providing a sustainable timber harvest. As provided in the statutes that guide state forest land management, "greatest permanent value" means healthy, productive, and sustainable forest ecosystems that over time and across the landscape provide a full range of social, economic, and environmental benefits." More detail outlining the legal and policy mandates for State forest lands can be found in the Oregon Revised Statutes, 530.010 to 530.170 and 530.450 to 530.520 and the Oregon Administrative Rules, 629-035 through 629-035-110. Or, you can refer to Appendix D, Legal and Policy Mandates, of the Northwest Oregon State Forests Management Plan.

Roads and Related Projects

COMMENT: My main concern is about the road construction proposed. I would like to see more road closures done than is currently proposed in the AOP. And the more roads built, the more compacted surfaces there are for runoff. Silt flowing into spawning sections of streams can have a major impact on development of salmon young.

RESPONSE: Quantities of road construction, maintenance and closure indicated in the AOPs are estimates based upon a limited level of reconnaissance for this level of planning. As greater field data is collected during the layout of operations additional assessments will be made regarding the quantity, location and long term need for specific roads. Active, closed and vacated roads receive differing levels of maintenance, all with the ultimate goal of minimizing erosion and sediment transport to streams. The road management policies and guiding principles for road management on State Forest lands can be found in the Forest Roads Manual, available on the web at

[http://oregon.gov/ODF/STATE FORESTS/Roads Manual.shtml](http://oregon.gov/ODF/STATE_FORESTS/Roads_Manual.shtml)

COMMENT: Commends the department for its work in roads and transportation planning and management. This is also an excellent investment in an asset for future forest management and for all Oregonians.

RESPONSE: There is guidance in the NWFMP, Landbase and Access section, page 2-58, that directs planners to minimize the amount of forestlands used for roads, road corridors, and landings by ensuring that construction and development specifications are designed to efficiently meet management activity objectives. ODF also has a Forest Roads Manual that describes road management policy and includes twelve guiding principles (pages 1-2 through 1-6). It is available on the State Forests web page.

Slope Stability and Geotechnical Issues

COMMENT: All high risk sites must be cancelled from all plans

RESPONSE: Development of broad strategies to address concerns about landslides and slope stability are not within the scope of the AOP process. Operations within the AOP's are consistent with the strategies found in the Northwest Oregon State Forests Management Plan under Aquatic and Riparian Strategy 6 (Page 4-71), in the Southwest Oregon State Forests Management Plan under Aquatic and Riparian Strategy 6 (Page 4-69), in the DRAFT Elliott State Forest Management Plan (Page 5-43) and the Elliott State Forest Habitat Conservation Plan (Page IV-9), and the Eastern Oregon Region Long-Range Forest Management Plan (V-13). Any new information or concerns discovered during sale layout are reviewed by geotechnical specialists and may result in modifications to the operation.

COMMENT: Concerned with cutting on very steep slopes.

RESPONSE: Operations within the AOP's are consistent with the strategies found in the forest management plans. Any new information or concerns discovered during sale layout are reviewed by geotechnical specialists and may result in modifications to the operation prior to auction. Strategies to address concerns about landslides and slope stability are found in the Northwest Oregon State Forests Management Plan under Aquatic and Riparian Strategy 6 (Page 4-71), in the Southwest Oregon State Forests Management Plan under Aquatic and Riparian Strategy 6 (Page 4-69), in the DRAFT Elliott State Forest Management Plan (Page 5-43) and the Elliott State Forest Habitat Conservation Plan (Page IV-9), and the Eastern Oregon Region Long-Range Forest Management Plan (V-13).

Recreation Resources

COMMENT: Is excited to see the two final sections of the Wilson River Trail completed. Encourages that ODF gets these completed in a timely fashion although they are the two most difficult sections of trail.

RESPONSE: This trail was identified as a priority in the non-motorized trail plan as discussed in the Action Plan 2000 and reviewed by the Tillamook Recreation Advisory Committee (TRAC). Trail construction occurs in steep, rocky, remote terrain with multiple creeks, rock faces, and headwalls requiring stream fords and bridges. The estimate of completion is difficult due to these concerns.

COMMENT: Encourages ODF to have the recreation technicians utilize South Fork Crews for trail restoration post-harvest.

RESPONSE: Specifications, such as timing and methods of operations, are routinely included in timber sale contracts to minimize impacts on recreation. Depending upon a variety of factors, any of a number of resources may be utilized to promptly provide any necessary restoration of trails, including South Fork crews, contractors, youth corps, volunteers, and district staff and equipment.

Other Resource Considerations

COMMENT: Do not log within 400 feet of springs or seeps for water protection

RESPONSE: Riparian strategies are not within the scope of the AOP's. Aquatic and Riparian Area strategies in the AOP's are consistent with the Management Standards outlined in the Northwest Oregon State Forests Management Plan (Appendix J), the Southwest Oregon State Forests Management Plan (Page 4-57), the DRAFT Elliott State Forest Management Plan (Page 5-28) and the Elliott State Forest Habitat Conservation Plan (Page IV-9), and the Eastern Oregon Region Long-Range Forest Management Plan (V-22).

COMMENT: Concerned with the increase of harvest of special forest products (e.g. mushrooms) and the impact that this has on the ecosystem.

RESPONSE: A vision of the role of Special Forest Products (SFP) is included in the Northwest Oregon State Forests Management Plan (NWFMP, Chapter 4, Resource Management Concepts and Strategies, pp 4-110 to 4-112, see Appendix C). Seven of the nine districts with State Forestland fall under the NWFMP. It states that, "special forest products will be managed as a viable, sustainable commodity program, compatible with other forest resources". Specific strategies are identified to "enhance the overall efficiency" of the program and to help this segment of the state's economy grow by providing a reliable source of raw materials for commercial and personal use. That being said, research is lacking concerning the ecology of SFP's. Numerous SFP's are harvested for commercial or personal use with new products being discovered all the time. An issue paper will be completed by the fall of 2005 to identify concerns and recommend courses of action regarding the management of SFP's on state forest lands.

COMMENT: Concerned about the use of herbicides impacting all kinds of animals including birds.

RESPONSE: The use of herbicides is widely recognized as a valuable tool in the management of young forest stands. Exhaustive testing is done to document impacts to wildlife before approval is granted on a federal level for the marketing of herbicides. Once approved, they may only be used strictly according to their labels, which specify rates and methods of application for the protection of resources and the protection of workers. Additional safeguards are imposed under the Forest Practices Act that address handling and application of chemicals on forest land, including buffers for protected resources such as streams. Other management techniques are used to minimize the use of herbicides, but when vegetation control is necessary herbicides generally represent the most cost effective method.

Other Issues

COMMENT: Feels ODF puts too much effort into presenting the information on what they are planning to do; time that could be spent doing more work like SLI.

RESPONSE: There is no doubt that the public involvement process is time consuming, however it provides a formal opportunity for ODF districts to share their annual plans with the public and for the public to ask questions and offer comments on the planned activities on state forest lands. In addition, the AOP Summaries provide a documentation tool allowing agency and public comparison of accomplishments with stated objectives.

COMMENT: Sees great progress in protection of young stands and feels these are a great investment in the future.

RESPONSE: A full range of silvicultural tools are employed to achieve the long-term goals of structure-based management and integrated resource management as outlined in the Forest Management Plan. The districts' strategies are implemented to establish and maintain diverse stands of well-adapted natural species throughout the landscape including rehabilitation, site preparation, planting, vegetation management, tree protection, precommercial thinning, fertilization and pruning.