

2006 AOP Public Comments and Responses

Astoria District

Current Stand Summary

COMMENT: Hamlet - This sale also includes timber stands that range in age from 66 to 85 years old. Further stating that these trees were planted by the Civilian Conservation Corp during the great depression as a work project for unemployed workers. Surely, this area is diverse enough without trying to "fix" it. Please reconsider this sale and others like it with older diverse growth and steep slopes that feed into small tributaries that eventually feed into larger fish-bearing streams.

RESPONSE: This timber sale was designed to be in compliance with the strategies laid out for this basin in the District's Implementation Plan. Please refer to the summary document pages 5-7 for a description of reasons why a sale is chosen for partial cutting or clearcutting.

COMMENT: Huff and Puff – This sale is planned in an intensively managed area near **Cougar Monster** and **Punchbowl**. There is no SLI and we worry that ODF will actually be clear-cutting in mixed, natively regenerated stands that may have been classified incorrectly.

RESPONSE: Full SLI was planned and will be conducted on this sale prior to auctioning. The current prescription will go forward as planned unless this stand is determined to be OFS.

COMMENT: McKnob – Areas 1&3 appear to be good examples of thinning in DFC general. However, areas 4, 5, and 6 appear to be are planned clear-cuts of native, diverse forest. This area may have been wrongly classified as a fully stocked conifer plantation. We'd like a better description of current stand conditions.

RESPONSE: Additional language was inserted into Section II. Current Stand Condition, on page 2 of the Pre-Operations Report to provide for further clarification of the stand conditions.

COMMENT: Goose Pit – Use of OSCUR 2000 is probably inaccurate baseline data for stand structure. OSCUR over-estimated closed single canopy coverage. We would like assurance from ODF that they will not allow clear-cutting of complex stands here.

COMMENT: Iron Man – No SLI, is this really closed single canopy?

RESPONSE: All ODF planned operations will be evaluated for SLI requirements using the SLI Flow Chart, unanimously supported by the State Forests Advisory Committee. If the stand is determined to be complex we will review the purpose and prescription of the operation in conjunction with new structure information and the desired future condition.

COMMENT: Grasslands Thinning- I fail to see how aerial photo observations can determine that the trees are exactly 36 years old. Admittedly, they could be 30 years off in at least one area.

RESPONSE: Aerial photos were not used to determine age for this sale. Age was determined from our inventory information, as noted on page 2 of the Pre-Operations Report.

COMMENT: SLI Concerns: Are we correct then in assuming that we are in the early stages of planning for 2006 sales and that there will be more detailed stand inventories conducted prior to the actual offering of the sales in the 2006 AOPs for bid, provided they are not partial cut harvest?

COMMENT: SLI Concerns: Why was Forest Grove able to complete SLIs for all of their planned sales but Astoria and Tillamook were not for almost all of their planned sales?

COMMENT: SLI Concerns: Shouldn't the data types used by each district be universal?

RESPONSE: SLI data was required on all planned harvest operations prior to sale to verify the stand structure types and to ensure stands with older forest structure were not regeneration harvested. The Department identified cost concerns with requiring SLI on all approved sales because the value of the data is lost when the harvest is completed. An algorithm was developed (and unanimously supported by the State Forests Advisory Committee) that analyzes a portion of the SLI data to determine if a stand is complex. This data is being gathered more efficiently through a combination of pre-cruise plots and timber cruise plots prior to the auction of a sale. If the stand is complex the District will review the harvest prescription. The use of this alternative is optional for areas with partial cut prescriptions.

Proposed Management Prescriptions

COMMENT: Sagermeister: These trees do not need to be managed, they are doing fine on their own.

RESPONSE: The partial cut prescriptions are designed to maintain and enhance the current diverse structure of the stand. To move these stands toward their complex Desired Future Condition of Layered and Older Forest Structure, it is necessary to remove some of the overstory canopy, to allow sunlight to penetrate to the forest floor, promoting growth of saplings and shrubs in the understory. The operations report for this sale also includes a tentative plan for creating snags and downed wood in order to decrease the time required for these stands to reach the target Desired Future Condition.

COMMENT: Cole Mountain - Areas 3 & 4 appear to be clear-cuts in more complex stands of older Northern Spotted Owl (NSO) habitat. These areas should not be clear-cut but thinned.

RESPONSE: This timber sale was designed to be in compliance with the strategies laid out for this basin in the District's Implementation Plan. Modified clearcuts are designed for this sale in areas which have a Desired Future Condition (DFC) of General Forestry. Partial cuts are prescribed for areas which have a DFC of "General" and Complex. The Cole Mountain Combination timber sale is not located within specified areas of focus in the current draft HCP strategies. The majority of these sales are partial cuts (89% of the acreage).

COMMENT: RipTide – The stand appears to be older (50-70 year old), native forest, not closed-single canopy. There are likely more appropriate areas to thin in.

RESPONSE: Stand Level Inventories (SLI) have been conducted on the Rip Tide sale areas and the operations plan has been updated with the new inventory information. This information will be used to provide better data of snag and down wood amounts that presently exist in each stand. It will also be used to aid in determining an appropriate partial cut prescription that will maintain and enhance the current diverse structure of the stand while moving the stand to an Older Forest Structure. These stands were chosen for harvest in an effort to enhance the marbled murrelet habitat in this area and accelerate the stand pathways towards Older Forest Structure. Please refer to the summary document page 5 for a description of why a harvest area may be chosen for partial cutting.

COMMENT: **Sagermeister** –We would prefer this area be left alone since it appears to be another example of thinning planned in older, native, complex stands.

RESPONSE: The partial cut prescriptions are designed to maintain and enhance the current diverse structure of the stand. To move these stands toward their complex Desired Future Condition of Layered and Older Forest Structure, it is necessary to remove some of the overstory canopy, to allow sunlight to penetrate to the forest floor, promoting growth of saplings and shrubs in the understory. The operations report for this sale also includes a plan for creating snags and downed wood in order to decrease the time required for these stands to reach the target Desired Future Condition.

COMMENT: **Steeple Chase** – ODF should be thinning, not clear-cutting to get to older forest structure!

RESPONSE: Area 4 has desired future conditions of General and has been targeted for regeneration (REG) to meet Implementation Plan goals for the Lousignot Basin. Other areas within this basin, such as Areas 1, 2, and 3 of this sale, are planned for more complex stand structures to meet the basin goals.

COMMENT: **Hamlet** – Planned clear-cuts of older, bigger trees do not make any sense. This area should be thinned.

RESPONSE: This timber sale was designed to be in compliance with the strategies laid out for this basin in the District's Implementation Plan. Modified clearcuts for this sale are designed in areas which have a Desired Future Condition (DFC) of General Forestry. Partial cuts are prescribed for areas which have a DFC of "General" and Complex. Please refer to summary document, page 5-7, for a description of why a sale is chosen for partial cut or regen. harvest.

COMMENT: **Larkin** – Again, we'd prefer that ODF go into younger stands to thin. Trees in the planned sale area are over 70 years old with a large DBH. Why thin here?

RESPONSE: The partial cut prescription is designed to maintain and enhance the current diverse structure of the stand, by removing about 40-45% of the overstory trees. To move Area 3 toward a LYR structure, it is necessary to remove some of the overstory canopy, to allow sunlight to penetrate to the forest floor, promoting growth of saplings and shrubs in the understory, consistent with the Desired Future Condition.

COMMENT: **Grasslands Thinning-** This sale is too heavy a cut. It leaves 3 trees per acre instead of 2 a heavy clear-cut would leave and is a modified retention clear-cut, not a thinning or partial cut. The trees are too old to log legally and are perfectly capable of naturally thinning themselves.

RESPONSE: The tentative prescription for both sale areas targets between 105 and 112 trees per acre to be left. With an age range of 31 to 45 years, this stand is an excellent candidate for a first entry thinning. Thinning at this age is especially important for a stand that is on a pathway towards a desired future condition of OFS.

COMMENT: McKnob: The project costs for this area are nearly three-quarters of \$1M, about 30% of the gross value. This is presumed to stem from the high number of new roads being built, 10.5 miles. At \$1.74M net value, this works out to \$166k of revenue per mile of new road. This is far out of synch with other projects in the area (e.g. **Goose Pit, Northrup Quarry, Rip Tide, Sagermeister and Steeple Chase**). The net revenue for these other projects range from \$70k per mile to over \$3M per mile of new road. What justifies spending so much money on this project for so little return?

RESPONSE: This sale is planned in an area with insufficient road access. Since much of the sale is initial entry thinning, with low present value of harvest products, the investment in roads is larger for this sale than for other sales. However, these roads will be part of the forest access infrastructure for years to come, and will access later entries into the forest, so their value will be realized in stages whenever there are forest management needs or recreational users in the area.

COMMENT: The new roads in **McKnob** are mostly along ridge tops. There is no stated plan to reforest them upon vacating operations. This brings considerable concern for erosion because of the amount of cable logging (25%) due to steep slopes. No mitigation plan is given.

RESPONSE: Careful planning and location of roads will ensure that the roads are located where potential impacts to natural resources such as water quality and aquatic habitat are minimized. The areas served by each road will be maximized where possible; thus minimizing the amount of road needed to meet management objectives. In addition, approximately 1.5 miles of roads will be temporary, and will be vacated and replanted upon completion of harvest activities.

COMMENT: McKnob- It is obvious that the new roads in this sale area are excessive. They raise the project costs to unacceptable levels. The plan should be revisited to minimize the extent of road building.

RESPONSE: This sale is planned in an area with insufficient road access. Since much of the sale is initial entry thinning, with low present value of harvest products, the investment in roads is larger for this sale than for other sales. Plans for road construction are not yet finalized, and every reasonable effort will be made to minimize road construction. 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

T & E Species Considerations

COMMENT: Osweg Alder No. 2: In 2004 there were two responses to spotted owls in the Buster Quarry site. The report does not specify if this is a female or specifically where the responses occurred. How will the owl habitat be protected without such information?

RESPONSE: The results of surveys for threatened and endangered species are described in the Pre-Operations Reports. Maps of the location of these species are considered confidential (by state statute) and will not be displayed. Results will be summarized by ODF biologists in the Biological Survey Report and available to the public with the final timber sale contract prior to auction. All planned operations in Astoria District's FY2006 AOP are in compliance with existing policies and regulations.

COMMENT: Rip Tide: A female spotted owl was observed in 2004. What is being done to protect the habitat of this confirmed female?

RESPONSE: The 2004 spotted owl observation referred to does not represent a confirmed owl site. This area has been surveyed yearly from 2001-2004 with only this single spotted owl detection. The closest spotted owl detection over the history of ODF surveys, is about one mile to the southeast. The closest known occupied site is about two miles to the southwest. The 2004 detection at Music Road is not consistent with what would be expected with a resident spotted owl. This observation is correctly classified as 'Non-territorial Single.' Although there are no legal or policy requirements to provide spotted owl habitat near observations of non-territorial single spotted owls, the sale prescription is designed to accelerate development of higher quality spotted owl habitat within this stand. While there may be a short-term impact upon habitat quality immediately after the sale, the harvested unit should not present a barrier to spotted owl passage. Thinning this dense stand will allow sunlight to penetrate to the forest floor, promoting growth of shrubs and tree saplings in the understory. Over the long term, this should enhance habitat quality for spotted owls.

COMMENT: Rip Tide: The biological assessment for this area strongly emphasizes problems with contractor surveys that failed to detect Marbled Murrelets. It finds that the surveys since 1997 are unreliable. The biologist concludes that the short-term impact to murrelet habitat is unknown and not low risk. A second biologist agrees with this assessment and emphasizes that if the sale proceeds, measures are needed to minimize impact on the murrelets habitat. The plan calls for logging activity if no detection of T&E species occurs. Given that the surveys have historically been unreliable, and that there is suitable habitat throughout the area, any logging activity should be curtailed indefinitely to allow these species to recover.

RESPONSE: The harvest prescription for Areas 1 and 2 of this sale is being designed assuming that murrelets are using the site. Areas 1 and 2 are within the West Tidewater MMMA. The prescription is designed to minimize short term impacts. Surveys are being conducted before and will be conducted after the operation to help us evaluate the effectiveness of the harvest prescription. The placement of survey stations has been modified to provide better coverage of the MMMA. We plan to use the pre- and post-harvest survey information in the future to help us make management decisions inside MMMA's in the future. This will enable us to more effectively enhance murrelet habitat in the long term while minimizing the short-term impacts.

COMMENT: Rip Tide- Much of the suitable habitat was not even surveyed at all in the last 7-8 years!

RESPONSE: Survey stations have been modified to provide better coverage of the sale areas and better determine the extent of marbled murrelet use of this area. Results will be summarized by ODF biologists in the Biological Survey Report and available to the public with the final timber sale contract prior to auction. Specific harvest prescriptions for this sale will be developed with input from the ODF Northwest Oregon Area Biologist and will include all measures necessary to minimize impacts on existing murrelet habitat. All planned operations in Astoria District's FY2006 AOP are in compliance with existing policies and regulations.

COMMENT: Goose Pit –There was an “unknown” NSO detection in this area. ODF must go back and survey for NSOs in the spring to determine their presence or absence. If present, this sale should be withdrawn.

COMMENT: Osweg Alder No. 2 - There were two positive responses for NSOs here in 2004. Any area with positive detections of NSOs should be off-limits to harvest. ODF must go back and survey for NSOs before proceeding with this sale. If owls are detected, the sale should be withdrawn.

RESPONSE: These sales are scheduled for survey in 2005. Results will be evaluated and planned activities will be in compliance with existing T&E species policies and regulations.

COMMENT: RipTide – This sale creates a moderate risk to Marbled Murrelets (MAMUs). We would like any such risks mitigated.

RESPONSE: Specific harvest prescriptions for this sale will be developed with input from the ODF Northwest Oregon Area Biologist and will include all measures necessary to minimize impacts on existing murrelet habitat. All planned operations in Astoria District's FY2006 AOP are in compliance with existing policies and regulations.

COMMENT: Cow Hollow – The trees in this sale in areas 3, 4, and 5, are identified as suitable MAMU habitat. These trees should be reserved.

RESPONSE: The trees within the partial cut areas described are not identified as suitable habitat but as potentially suitable habitat. If surveys show that these trees are occupied by murrelets then existing policies will be followed to ensure they are protected correctly. Irregardless, the trees which exhibit the characteristics of emerging marbled murrelet habitat within these specific areas will be retained as part of the residual stand.

COMMENT: Sagermeister – ODF should leave all trees with potential nesting habitat for MAMUs intact. These are not very merchantable anyway.

RESPONSE: All timber sales are evaluated for potential habitat for murrelets by the Area Biologist. Sale areas and adjacent habitat (within 100 meters) considered poentially suitable is surveyed to protocol and survey results are evaluated at the end of each year. Any timber sales found to be occupied by murrelets are evaluated by the Area Biologist and modified by the Unit Forester to comply with all laws and policies. Biological Assessments are completed for any sale operating within Marbled Murrelet Management Areas.

COMMENT: Sweeping Corners – There may be NSOs present here since they are present at the adjacent Osweg No. 2 sale. We'd like ODF to survey for NSOs and if detected the sale should be withdrawn.

COMMENT: Any sales (like Rip Tide), that are not completely surveyed (for owls) must be cancelled.

RESPONSE: These sales are scheduled for survey in 2005. Results will be evaluated and planned activities will be in compliance with existing T&E species policies and regulations.

COMMENT: Grasslands Thinning- Part of this sale is in violation of the agreement with USF&W to not log trees over 40 years old.

RESPONSE: Astoria district proposed the Grasslands Thinning timber sale in stands consisting of even aged plantations. Although the portions of these stands that are within the Strum Creek home range are currently not 40 years old or greater, they may be at the time of harvest. In accordance with the "Agreement for the Conservation of Northern Spotted Owls," the proposed sale areas will be reviewed with ODF, ODFW, USFWS biologists and Astoria District Staff in order to seek a modification to this agreement. A modification to this agreement is required for harvest of timber over 40 years old for areas covered by this agreement.

COMMENT: Rip Tide- Buffers are far too small, visual and sound effects of logging and hauling are not kept far enough away from active MMMA's.

COMMENT: Rip Tide- "Small patches" are sometimes left where Murrelets have been observed in surveys. This is not enough and not in accordance with the ESA "may be more restrictive but not less" directive.

RESPONSE: Specific harvest prescriptions for this sale will be developed with input from the ODF Northwest Oregon Area Biologist and will include all measures necessary to minimize impacts on existing murrelet habitat. All planned operations in Astoria District's FY2006 AOP are in compliance with existing policies and regulations.

COMMENT: (Relates to any and all sales) All logging within 400 feet of the MMMA must be cancelled.

RESPONSE: ODF's obligation under the Federal Endangered Species Act is to avoid 'incidental take' of listed species, including the northern spotted owl and the marbled murrelet. ODF has policies on how to avoid incidental take of these species and follows these policies when identifying potential timber sale locations and when preparing the sales for auction. ODF also has entered into an "Agreement for the Conservation of Northern Spotted Owls" within the northern Oregon Coast Range. ODF conducts protocol surveys of all potential habitat within and contiguous to proposed sale areas for spotted owls and marbled murrelets. If these birds are found, then ODF implements the habitat protections outlined in the policies and in the "Agreement." Although no protection or special management is required for unoccupied stands, ODF is implementing the Northwest Oregon Forest Management Plan, and is managing to develop complex stand structures over approximately 50% of ODF managed lands in northwest Oregon.

COMMENT: Grasslands Thinning- ODF has chosen to rely on private lands to meet their Northern Spotted Owl Agreement. I don't feel this is appropriate.

RESPONSE: Not an AOP issue. Including Private lands is consistent with ODF policy.

COMMENT: Summit Combo – This is potential suitable MAMU habitat and should be approached carefully. We applaud ODF for not allowing clear-cutting in older forest structure here.

RESPONSE: Marbled murrelet surveys will be completed to protocol prior to harvest. If surveys show that these trees are occupied by murrelets, then existing policies will be followed to ensure these areas are protected correctly. The partial cut prescription is designed to maintain and enhance the current diverse structure of the stand.

COMMENT: My concern is with the many proposed timber sales that include cutting on very steep slopes. An example would be the **Hamlet** sale in Clatsop country that states: "The landform for Area 6 is moderate with some very steep slopes in the headwaters of a small tributary of Fall Creek a tributary of the North Fork of the Nehalem River."

RESPONSE: All proposed timber sales are reviewed by an ODF geotechnical specialist. During future sale preparation activities, the geotechnical specialist will review the sale in the field to ensure that potential impacts to natural resources such as water quality and aquatic habitat are minimized. In addition, the sale shall receive all resource protection measures necessary to mitigate any slope stability hazards in accordance with the standards contained in the Salmon Anchor Habitat strategies.

COMMENT: **Rip Tide-** Steep slopes above Music creek could slide polluting waters of the state, high wind-throw factors could increase the risk.

RESPONSE: An initial hazard and risk assessment was completed by the ODF geotechnical specialist, and was determined that there are three high landslide hazard locations that may be present along the southeastern edge of Area 3. These areas will be posted out of the sale area. If high landslide hazard locations are identified within the sale area during fieldwork the geotechnical specialist will be consulted.

Recreation Resources

COMMENT: Recreation Resources (**Goose Pit, McKnob, Northrup Quarry, Osweg Alder, Rip Tide, Sagermeister, Steeple Chase**)- There is not enough emphasis placed on planning for recreation resources in this neck of the woods.

RESPONSE: The following information can be found in the summary document beginning on page 21, in the section titled "Recreation Management". The Astoria District has recreation opportunities planned for areas throughout the district during fiscal year 2006 including: The Northrup Creek Horse Campground and associated day use facility and tent camping area will be completed and open for use in the Northrup Basin; Planning for development of and OHV recreation area on Nicolai Mountain is currently in process with initial construction anticipated during 2006. At Lost Lake, conceptual design for development of camping and day use facilities has been completed, with construction drawings expected to be completed during this fiscal year. Also in this fiscal year, planning for additional equestrian trails in Northrup Basin, and hiking trails in Quartz Basin and Gnat Basin will be ongoing, as well as a review of the Astoria Basin to address designation of motorized and non-motorized activity areas. Additionally, we are making improvements to Henry Rierson Spruce Run Campground, as well as routine maintenance of facilities at Gnat Creek Campground, and the Bloom Lake, Soapstone Lake, and Gnat Creek trails and trailheads will continue.

COMMENT: I have noted the chloritic appearance of many of the D-fir residual trees in the many commercial thinnings that have taken place on Nicolai Mountain the past 5-7 years. These are not symptoms of Swiss Needle Cast, and may indicate lack of sufficient nitrogen in the soil. I think these stands should be considered for fertilization.

RESPONSE: This area is being considered. A cost Benefit Analysis needs to be conducted.

COMMENT: The discussion of fertilization on page 21 says "A cost benefit analysis is being conducted on a fertilization project for Astoria's FY 2007 AOP." Is the project referred to the one I mentioned (comment 1A)? If so, I think the document would be clearer if it said so... just insert the words "in Nicolai Mountatin area" in the sentence, and I wouldn't be writing this comment. If not, I recommend you look closely at this area for a fertilization project in the very near future.

RESPONSE: Good recommendation. Please see revised paragraph regarding fertilization.

Other Issues

COMMENT: On page 7, in discussion of laminated root rot, the third sentence reads, "And in selected cases, we do not attempt to cut out the infected trees, allowing it to spread at approximately one foot per year." This is an interesting prescription. This comment leaves the reader wanting to know why this prescription is sometimes chosen. What are the benefits of this prescription, and in what cases would this prescription be chosen? An extra sentence or two of explanation would help the reader's understanding of this section.

RESPONSE: Please see revised paragraph on page 7, which now further clarifies prescriptions to laminated root rot. "In the Astoria District, laminated root rot disease is prevalent at endemic levels throughout much of the forest. Generally, stands infected with this disease retain the pathogen at moderate to low levels and cause tree mortality of individuals or in small groups. This endemic level of infection helps to create snags, provides additional sources of downed wood and small openings within denser stands, and is generally not treated. If higher levels of laminated root rot exist, other prescriptions for treatment of the disease may be implemented in conjunction with the Desired Future Condition and the landscape plan. Prescriptive treatments to heavily infected stands may include modified clearcuts or limited patch cuts, and then replanting these sites with disease resistant species, such as red alder or western red cedar."

COMMENT: Pre-Operations Reports with discrepancies in the net acres listed in Table one on the first page, and the acres shown on the maps. **Northrup Quarry Combination** (371 net acres in Table 1 vs. 140 acres + 260 acres = 300 acres on the maps - this one has an arithmetic error as well since $140+260=400$, not 300).

RESPONSE: There is an error in the acreage table shown on the maps for this sale. The net acres should show 371 acres (modified clearcut = 138 acres; partial cut = 233 acres) This will be corrected in the final AOP.

COMMENT: Another acre discrepancy: **Rip Tide** (262 net acres in Table 1 and 252 acres on the maps)

RESPONSE: There is an error in the acreage table shown on the maps for this sale. The net acres should show 262 acres of partial cut. This will be corrected in the final AOP.

COMMENT: Another acre discrepancy: **Cow Hollow** (341 net acres in Table 1 and 343 acres on the maps).

RESPONSE: There is an error in the acreage table shown on the maps for this sale. The net acres should show 341 acres (modified clearcut = 22 acres; partial cut = 319 acres) This will be corrected in the final AOP.

COMMENT: **Osweg Alder No. 2:** The costs for this logging sale don't add up. The conifer value is estimated at \$350k, hardwood at \$127.5k. That should make a gross total of \$477.5k. There are no project costs, but the net value is listed only \$162.5k. Why is there this discrepancy? What accounts for the missing \$315k?

RESPONSE: There is an error in the Table V of the Osweg Alder No. 2 report. The net value should show \$477,500. This will be corrected in the final AOP.