

2006 AOP Public Comments and Responses

Forest Grove District

Proposed Management Prescription

COMMENT: **Das Butte:** "If this sale was changed to a maximum of 60% cut of smallest trees, leaving big leaf maple, cedar, and mixed forest, it would be acceptable."

RESPONSE: The prescription for Das Butte is a modified clearcut. The sale areas are composed predominantly of heavily stocked, dense Douglas-fir. Most trees have poor live crown ratios and poor height to diameter ratios. Due to these characteristics, these stands are not ideal candidates for a partial cut prescription. The green tree retention strategy will leave large residual trees evenly dispersed throughout most of the sale area. The regeneration will be a more even mix of Douglas-fir, hemlock, and noble fir.

Roads and Related Projects

COMMENT: "Why is Forest Grove closing 33 miles of road?" "Only the Forest Grove district is proposing a sufficient amount of road closures."

RESPONSE: The amount of road closure estimated in the summary document refers to the amount of road that will be evaluated for closure. The FY06 AOP may provide more or less opportunities for closures than this preliminary estimate.

T & E Species Considerations

COMMENT: **Mystree Thin:** "Canopy need not be completely enclosed, however, trees must be left close enough to prevent large predator birds from flying below it."

RESPONSE: The prescription for all three areas of Mystree Thin is moderate partial cut. The target SDI is approximately 30. Douglas-fir will be selected for harvest. All other species will be reserved. The stand will be thinned to a target basal area of 140 square feet. The average DBH of the residual stand will be approximately 23 inches. Residual trees will be the trees that have the largest DBH and height, and are of the best form and vigor.

COMMENT: **Mystree Thin:** "This sale presents a good opportunity to improve habitat while producing timber revenue at the same time."

RESPONSE: We believe the prescription for Mystree Thin will meet both of these objectives. The BA states (under the section Anticipated Impacts of the Harvest Prescription): "The desired future condition for the entire sale area is about 67% Layered and Older Forest Structure. The thinning prescription should result in increased growth of residual trees and understory...If the sale prescription is successful in moving the stand structure toward the DFC, then it should result in higher quality spotted owl habitat over the long term." The estimated net value of Mystree Thin is \$1,218,000.00. The USFWS reviewed this sale and determined that this sale was not likely to result in incidental take of spotted owls.

COMMENT: Mystree Thin: "They call it [the Kinney Grade owl site] a resident single, not because there is just one owl there, but because they don't know what sexes the various owls are they hear."

COMMENT: Das Butte: "Too little is known about the owls of Kinney Grade circle. They don't know how many or what all sexes there are. There is too little information to risk take due to blanks in data such as if there is a nest site, where it is, and how many owls there are."

RESPONSE: Three spotted owl observations in the same area within two years of survey resulted in the establishment of an activity center and "resident single" site status for the Kinney Grade owl site. A female spotted owl was heard in this area during the 2003 survey season. She was not found during the daytime follow-up visit, and there were no further responses detected during the three additional surveys conducted in 2003. During the 2004 survey season, a spotted owl was heard during two separate nighttime surveys in close proximity to the 2003 location. The first 2004 observation was confirmed as a female, and the second response was a vocalization that is characteristic of both sexes; therefore it is unknown whether the second observation was a male or a female. The owl was not located during the daytime follow-up visits, and there were no further responses during the three additional surveys conducted in 2004. The area will be surveyed again in 2005.

COMMENT: Mystree Thin: "Cumulative effects of Mystree and Das Butte on the spotted owls who live would at least double cumulative adverse effects on an already threatened species."

RESPONSE: Das Butte is outside the Kinney Grade owl circle. The BA states (under the section Cumulative Impacts): "Mystree Thin sale acreage within the owl circle is relatively small (52 habitat acres and 9 non-habitat acres), so harvest of this sale should not substantially increase cumulative impacts within the owl circle." The USFWS reviewed this sale and determined that this sale was not likely to result in incidental take of spotted owls.

COMMENT: Mystree Thin: "Logging within their home range must actually benefit the owl, not imperil them further."

RESPONSE: We believe the prescription for Mystree Thin will meet both of these objectives. The BA states (under the section Anticipated Impacts of the Harvest Prescription): "The desired future condition for the entire sale area is about 67% Layered and Older Forest Structure. The thinning prescription should result in increased growth of residual trees and understory...If the sale prescription is successful in moving the stand structure toward the DFC, then it should result in higher quality spotted owl habitat over the long term." The USFWS reviewed this sale and determined that this sale was not likely to result in incidental take of spotted owls.

COMMENT: Das Butte: "Places an oversized clear-cut adjacent to a spotted owl circle...oversized clear-cuts are illegal."

RESPONSE: Two sale areas that were originally part of Das Butte were removed from the FY06 sale plan because they were within the 1.5-mile radius circle around the activity center for the Kinney Grade spotted owl site. Areas I and II are outside of the 1.5-mile circle. Area I is a 102-acre modified clearcut and Area II is a 9-acre modified clearcut. Under the Forest Practices Act, a clearcut cannot exceed 120 acres in size.

COMMENT: "Some of the **C.C. Rider** sale is clearcut planned in an owl circle. Three survey responses were detected in 2004. A BA should be completed and the sale should be withdrawn if significant impacts to NSOs are found."

RESPONSE: C.C. Rider is not within an active spotted owl circle. The sale area is within the historic Wheeler owl circle. The Wheeler owl site was classified as "resident single" status from 1996-2000. The presence of spotted owls was not detected from 2001 to 2003. Therefore, in accordance with survey protocol standards, site status was changed to historic due to three subsequent years of vacancy. The closest responses during the past four years of survey (2001-2004) have been 4-5 miles from the C.C. Rider sale area. A BA is not required for this sale.

COMMENT: **Mystree Thin:** "This sale has 2 clear-cuts both adjacent to and within a spotted owl circle."

RESPONSE: The prescription for all three areas of Mystree Thin is moderate partial cut. Approximately 61 acres of Area III are within the 1.5-mile radius circle around the activity center for the Kinney Grade spotted owl site. A Biological Assessment (BA) was completed by the ODF Northwest Oregon Area Biologist and was reviewed by U.S. Fish and Wildlife Service (USFWS), in accordance with the Agreement for the Conservation of Northern Spotted Owls (2001). In the BA, the Area Biologist concluded that harvest of Mystree Thin would result in a low biological risk to the the Kinney Grade spotted owl site. The USFWS concluded that harvest of Mystree Thin is not likely to result in incidental take of spotted owls.

COMMENT: **Das Butte:** "Cumulative effects of Das Butte and Mystree would at the least double adverse impacts on the threatened owls who live here. It would effectively harass and tend to pursue the birds from their circle when one sale may not so much."

RESPONSE: Das Butte is outside the Kinney Grade owl circle. The BA states (under the section Cumulative Impacts): "Mystree Thin sale acreage within the owl circle is relatively small (52 habitat acres and 9 non-habitat acres), so harvest of this sale should not substantially increase cumulative impacts within the owl circle."