

## 2006 AOP Public Comments and Responses

### Northwest Oregon Forest Management Plans

### Current Stand Summary

**COMMENT:** Should use full SLI data for all planned sales.

**COMMENT:** No clearcuts should occur in stands where inventory data is not accurate

**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.

### Desired Future Condition

**COMMENT:** How does ODF measure consistency with DFC?

**COMMENT:** Sees good progress toward the DFC in a variety of stand classes.

**RESPONSE:** The importance of understanding how stand structure conditions develop as a result of silvicultural prescriptions is recognized within the monitoring step of the adaptive management approach utilized in the forest management plans. The Department is embarking upon a Stand Structure Development Study. The objective of this study is to examine how stand structure conditions are changing as a result of management prescriptions and to determine whether post-harvest stand structure conditions are developing as projected. This study will be accomplished for the 10-year review in the year 2011 as required by the FMP and OAR 629-035-0030. It will continue as a long-term study beyond this 10-year review for decades afterward. Information from this study will also be used as part of another project aimed at defining relationships between stand structure characteristics and native wildlife habitat.

**COMMENT:** Which planned sales help landscape move to DFC and which don't?

**RESPONSE:** Table 2 in each NWOA District's AOP Summary Document provides an estimate of the total AOP contribution to achieving the Desired Future Condition within 5-10 years of the completion of the operations within the AOP. Table 3 in each Pre-operations Report, included with the AOP Summaries for public comment, provides specific projections for individual areas within each harvest unit, again within 5-10 years of the completion of the operation. The Current Condition and Desired Future Condition for each area are also identified in Table 3.

**COMMENT:** External review of placement of DFC on the landscape.

**COMMENT:** Regarding the location of “desired future condition complex” stands in the landscape design - ODF has never overtly and systematically addressed the relationship between the landscape design and the timing of the attainment of the desired future conditions. I suggest you add the landscape design to the SFAC agenda. The landscape design needs an independent and scientific review to identify alternatives for the placement of complex stands.

**RESPONSE:** The current landscape designs for each District under the NWFMP were developed as part of the Implementation Plans completed in early 2003. The design principles and strategies were developed through a team effort that included representation from other natural resource state agencies, Oregon State University (OSU), OSU-Extension, Oregon Forest Industries Council, Oregon Trout, non-industrial landowners, the Sierra Club, forest industry, and the N. Coast Land Conservancy and Coast Range Assoc. Also involved were independent scientific peer reviewers from Oregon State University, the Pacific Northwest Research Station, University of Washington, and the National Biological Service. Following a public review and comment period, the State Forester approved them in March of 2003.

**COMMENT:** Many of ODF’s operations may be further delaying the attainment of the desired future conditions.

**COMMENT:** Was surprised that information on the cumulative impact is not readily available. Feels this could be done with a simple chart that monitors the impact. Would feel more reassured if there were more consistent monitoring practices (e.g. every three years).

**RESPONSE:** As part of the monitoring effort of the adaptive management process in the NWFMP, the Department is embarking upon a Stand Structure Development Study. The objective of this study is to examine how stand structure conditions are changing as a result of management prescriptions and to determine whether post-harvest stand structure conditions are developing as projected. This adaptive management approach will allow us to continue to make better decisions in the future.

**COMMENT:** ODF continues to clearcut stands that are well on their way to becoming complex stands. The justification for this clearcutting is, in part, that the stands have not been selected to move toward complex forest – that is, they are not “desired future condition complex.” At the same time, less complex plantations nearby are often designated for development into complex stands.

**RESPONSE:** The landscape designs for each District specify a desired future array of stand structure types. Landscape management strategies were developed to create such an array that, when properly arranged on the landscape, will contribute to the habitat needs of all native species. Two main strategies were used in the placement of future complex stands. First, desired future condition (DFC) complex was placed where structural components of mature forests can be relatively rapidly achieved. Second, it was placed where resource protection can be maximized or where other resource values have a higher management priority (i.e. T&E species, riparian areas, steep slopes, recreation sites). Other determinants included patch size and shape, interior habitat area, fragmentation, and creation of corridors to connect patches. Generally speaking, individual watersheds have a mix of all stand types. All current older forest structure stands were designated DFC complex, as were nearly all layered stands. See Appendix C of the Northwest Oregon State Forests Management Plan for more information.

**COMMENT:** Suggests three additions to the summary document: 1) Provide a brief overview of Landscape Design to give those that are not familiar with the process a bit of background 2) Clearly link planned sales to the Landscape Design principles and DFC 3) Provide summary charts.

**RESPONSE:** 1) An overview of each District's landscape design is included in their individual Implementation Plans. They are available on the web at

[http://oregon.gov/ODF/STATE\\_FORESTS/jp.shtml](http://oregon.gov/ODF/STATE_FORESTS/jp.shtml). 2) The AOP summary documents and the Pre-operations reports refer to the DFC for each planned operation and provide projections of how the stands will develop within 5-10 years. 3) Summary charts are also included projecting cumulative changes as a result of the current AOP. A planning and tracking system is being developed.

**COMMENT:** Concerned that the NW FMP calls for 10% or less of stands being hardwood stands

**RESPONSE:** The 10% mentioned refers only to forest stands that are 70% hardwood. Most forest stands across the landscape contain some component of hardwoods, to varying degrees. There is recognition in the forest management plans that hardwoods play an important role in providing diversity and promoting a properly functioning and healthy forest. Management strategies are directed toward maintaining hardwood components where they have historically and are naturally found, such as riparian areas and saturated soils. In addition, hardwoods are promoted as an effective treatment in areas where laminated root rot is a concern in conifer stands. Finally, the increased commercial value of red alder has created more options and opportunities for its management. The study of hardwood management is comparatively new and is still evolving. Through the adaptive management process, there will be continued monitoring and evaluation of the management of hardwoods.

**COMMENT:** There is no indication in the AOP's about the district's goals of maintaining hardwoods or promoting hardwood growth.

**RESPONSE:** Goals and objectives for each District's management of hardwoods were developed for their Implementation Plans (IP's) and can be found in the Management Activities section of those documents. The 2006 AOP's are consistent with the IP's. Descriptions of harvesting operations in the Pre-operations reports, posted with the 2006 AOP Summaries on the web, in many cases make reference to the specific treatment of hardwoods in the Proposed Management Prescription section.

**COMMENT:** Why not use alternatives to clearcutting in areas with older, larger trees?

**COMMENT:** Harvest in rare complex and older stands should be avoided until ODF has achieved more balance across the landscape.

**RESPONSE:** A broad continuum of silvicultural practices and harvesting intensities, including partial and regeneration harvests, are utilized to implement the forest management plans applied to State Forests. Determination of the harvesting prescription for any given stand is based almost exclusively upon its current condition and the desired future condition in the landscape design. Some stands are not targeted for complex structure. Regeneration harvesting in these areas helps to meet harvest objectives and is done in a way that retains structural components, such as remnant old growth trees, residual live trees, down wood, and snags. Stands designated for complex structure may be regeneration harvested if the current condition of the stand clearly indicates that partial cutting and additional active management, such as underplanting, will not produce the necessary response to develop all the characteristics, in sufficient quantity, that define complex structure. More examples of when regeneration harvesting is appropriate can be found in the Forest Grove AOP Summary on page 6.

**COMMENT:** Why clearcut in areas where DFC is OFS or Complex structure?

**COMMENT:** Many clearcut operations in the 2006 AOPs are planned for areas that show some complexity (understory stands) and that are currently designated to become complex forests.

**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:** Why clearcut in areas where DFC is Understory?

**RESPONSE:** While there are specific ranges of structure types specified for each district in the FMP, DFC in the landscape design only specifically identifies the complex structure types, LYR and OFS. In general, the retention of structural components and management practices applied to all younger stands will maintain them on a trajectory from regeneration to understory development with the potential to become complex. Some closed single canopy and understory stands will be regeneration harvested prior to achieving complexity.

**COMMENT:** Regarding the clearcutting of stands designated to become complex - When ODF plans to clearcut areas that are designated to become complex forests, they bear a high burden to explain such activities. An expansion of how clearcutting is superior to an alternative treatment needs to be included in the AOPs.

**RESPONSE:** A change for the 2007 AOP's is being considered that would include an explanation of the philosophy behind harvesting prescriptions, regardless of the DFC of the stand. This relates directly to the monitoring aspect of the adaptive management approach of the NWFMP.

**COMMENT:** I would also request that the Department of Forestry continue their program, and maybe even more aggressively, of hard wood thinning, especially along streams. Thinning of hardwoods would allow more conifers to grow and eventually provide the large woody debris needed in streams for protection of young salmon and trout.

**RESPONSE:** Hardwoods are typically in the closed single canopy stand structure and are found primarily, although certainly not exclusively, in stream corridors. Completion of watershed assessments is underway to identify potential factors that contribute to undesirable aquatic habitat conditions. The aquatic and riparian strategies found in the forest management plans contain a number of alternative vegetation treatments designed to restore properly functioning aquatic habitats, of which selective removal of hardwoods is only one. Conversion of hardwood stands to conifer, establishment of shade tolerant conifer seedlings, and creation of gaps in hardwood stands to establish shade intolerant conifers are among the other potential treatments. Completed assessments will be used to evaluate which vegetation treatments are needed and most effective.

## Estimated Resource Outputs

**COMMENT:** Feels that ODF is beginning to portray a more industrial approach to timber harvest and does not feel this is the intent of the FMP.

**COMMENT:** District volumes are at the high end of the ranges and while they are meeting the letter of the IP's they are not meeting the spirit of the FMP.

**COMMENT:** Concerned that ODF is looking at a more commercial forest rather than a natural forest where Salal has it's place too.

**COMMENT:** Did not see any indications that the AOP's were not in line with the 10-year IP's with the exception that the high harvest levels are not sustainable.

**COMMENT:** Is concerned about the public perception of the high-end volume.

**COMMENT:** Agrees that the acreages are in the mid-range. Disagrees with the misperception that ODF is at the top of the range.

**COMMENT:** Sees room for increase in volume and acreage and is not concerned that the department is managing at an unsustainable rate.

**COMMENT:** FY06 AOPs only contain 13 acres of traditional clear-cut, and that figure alone illustrates that the FMP is not an industrial forest management system.

**RESPONSE:** The harvest range in the Implementation Plans was established to provide operational flexibility to deal with changing markets and other unforeseen circumstances. At the direction of the 2003 Oregon Legislature, we have been operating at the upper end of the IP ranges for the Tillamook and Clatsop State Forests for 2005 and 2006. Operating at the upper end of the range for this very short timeframe still preserves our ability to manage these forests to provide a broad range of environmental, economic and social benefits. We are remaining consistent with the goals and strategies within the FMP and the IP's. The "state of the art" Harvest and Habitat modeling project currently underway has provided preliminary numbers for the Astoria, Forest Grove and Tillamook Districts that fall within the IP ranges while emphasizing attainment of forest structure and the desired future condition.

## NWFMP Continued

## Estimated Resource Output

**COMMENT:** Disagrees with the comments that the volume is not sustainable. The volume is a by-product of the acres harvested. The IP ranges are set in acreage.

**RESPONSE:** The IP ranges do set objectives based upon acreage. Expected harvest volume estimates are also included in the Expected Outputs and Habitat Achievements section of each IP. These estimates are based upon historical averages for the types of harvests included in the AOP's.

**COMMENT:** Sees more timber volume coming off of fewer acres. Is concerned that the revenue increase from the higher volume will build an expectation within the legislature that these dollars are consistently available to balance the state budget when they should be going to build a reserve.

**RESPONSE:** The harvest levels of the past two years were temporarily set by the 2003 Oregon Legislature until the results of the Harvest and Habitat modeling project are completed.

## T & E Species Conditions

**COMMENT:** BA's for most sales aren't complete, giving public no opportunity to comment on completed BA's

**RESPONSE:** Preliminary BA's are prepared as part of the development of an AOP and can be requested during the Public Comment Review process. The Preliminary BA's are reviewed by the US Fish and Wildlife Service and Oregon Department of Fish and Wildlife. Their comments are received during the Public Comment Review process and are considered when determining whether to include a sale in the approved AOP's. Approved AOP's are posted on the State Forest website and include an Appendix that summarizes any changes made to the DRAFT AOP. If sale boundaries or design are modified after approval of the AOP, potential compromise of the status of T&E surveys is analyzed. Biological Survey Reports are developed to summarize survey history and results, T&E considerations, BA findings and operational considerations. A "final" BA that incorporates any new survey or other information acquired during sale preparation is developed and available for public review prior to auction of a timber sale.

**COMMENT:** All sales must be surveyed for threatened birds for 4 years.

**RESPONSE:** In order to comply with federal and state Endangered Species Acts, survey requirements for each sale are determined in accordance with ODF policy guidance developed for Northern Spotted Owls and Marbled Murrelets. This includes the November, 2002 ODF Policy Guidance: Northern Spotted Owl Surveying on State Forest Lands and survey methodology specified in the Protocol for Surveying Proposed Management Activities That May Impact Northern Spotted Owls. This protocol, originally dated March 1991 and revised March 1992, is endorsed by the USFWS. Marbled Murrelet survey requirements for each sale are determined in accordance with November, 2004 ODF Policy Guidance: Marbled Murrelet Operational Policy, 2004 Revision. The survey methodology and standards utilized by ODF for Marbled Murrelets are based on the protocol developed by the Pacific Seabird Group (2003 revision).

**COMMENT:** Clearcuts should be prohibited in NSO & MAMU habitat.

**COMMENT:** Main concern is for wildlife, particularly Marbled Murrelett and Spotted Owl. None of the sales have completed surveys and these need to be complete.

**COMMENT:** Would like to see all suitable habitat avoided for clear-cut, especially if there is Spotted Owl detection in the area.

**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.

## Other Wildlife Considerations

**COMMENT:** Did not see any mention of elderberry trees and cascara was only listed in one AOP. We feel that if ODF is destroying a habitat through harvest, then it should recreate habitat as well.

**RESPONSE:** While costly and used only when necessary, reforestation efforts directed at establishing a new stand of trees sometimes require the short term control of competing vegetation. Other management techniques are utilized to minimize the need, including planting the site the first season after disturbance when the competition is the least and using large and vigorous planting stock. Control measures, when utilized, do not destroy or eradicate the otherwise desirable species, but allow the trees to become the dominant vegetation. At that point control measures cease and the shrub and herbaceous communities typically recover. The result can be habitat enhancement for many wildlife that utilize these species as they flourish with greater exposure in the new conditions.

## Other Issues

**COMMENT:** Appreciates the efforts to apply adaptive management but does not see it happening enough in regards to SNC.

**RESPONSE:** ODF is committed to the Swiss Needle Cast (SNC) Cooperative and OSU research, currently 2 years into a ten year study. In response to new information concerning SNC, the Tillamook District made a modification in its Implementation Plan increasing the partial cut acre objective. Other SNC adaptations include the development and use of SNC tolerant Douglas-fir seed, mixed species planting in the SNC zone, and prescriptive precommercial thinning. Prescriptions for '06 sales will be reviewed during sale preparation, however, there is limited flexibility to select new sale areas for the '06 and '07 AOP's because of 2 year T&E species survey requirements. SNC information has been incorporated into the Harvest and Habitat model and is reflected in the preliminary outputs.