

2006 AOP Public Comments and Responses

Tillamook District

Current Stand Summary

COMMENT: We are concerned with ODF's shift away from performing full Stand Level Inventories (SLIs) for all planned sales.

RESPONSE: Timber sales have stand measurements recorded to calculate Diameter Density Index and determine stand structure. Plots are established in timber sale areas during reconnaissance for AOP development, again for pre-cruise measurements, and finally during timber cruises. These plots are used to determine the overall current condition of the stand and sale prescription.

Proposed Management Prescription

COMMENT: It is not clear from the plans how the clearcutting of Understory stands which are designated to become complex forests is consistent with the development of complex forests in a timely fashion.

RESPONSE: The stands are classified as understory because there are two or more species of brush or tree in the understory. Many of the UDS stands have Salmonberry and fern understory due to the lack of needle retention in Douglas-fir in the overstory. Needle retention (or lack of) is one indicator of the severity of SNC in the stand. Harvesting these stands due to stand health is an appropriate prescription in some of these situations.

COMMENT: ODF needs to directly and clearly explain how clearcutting is superior to an alternative treatment, such as a thin which leave behind far more trees than a clearcut.

RESPONSE: In stands where growth has slowed or where stands are dense, regeneration harvests can be the quickest way to healthy diverse stands and if applicable to develop complex desired future condition of stands.

COMMENT: How can ODF claim that clearcutting will move the landscape toward the DFC stand structure?

RESPONSE: Timber sale prescriptions are developed based on the current condition of the stand. While some areas shown on the IP map as DFC complex are being clearcut, other areas in the district shown as GEN are being moved toward complex structure development. Stands impacted by Swiss needle cast infection, overly dense stands (poor height to diameter ration) and/or single species, one story stands are some of the reasons stands shown in the IP "example" map are planned for regeneration harvest.

COMMENT: Why thin in 100 year old stands? (Rackheap Falls)

RESPONSE: The operation is thinning for stand health, vigor and structure development no matter what the age of the stand. Approximately 100 acres of the total 440 gross acre sale is 100 years old according to OSCUR02 inventory data. Fifty acres of this was thinned approximately 25 years ago. Thinning this stand again will keep live crown depth in the to 40-50% range, and provide layering and understory development.

COMMENT: Hardwoods should not be left just in riparian areas but rather scattered throughout the landscape.

RESPONSE: A variety of silviculture prescriptions are used to harvest and retain hardwoods. Many partial cuts reserve hardwood species from harvest, some regeneration harvests reserve hardwood species across the unit or in clumps as well as in riparian areas. These prescriptions also retain mature hardwoods as well as smaller diameter (non-merch) hardwoods. Hardwoods are also retained in stands during PCT thinning.

Roads and Related Projects

COMMENT: Would like to see more road closures done than is currently proposed in the AOP.

RESPONSE: Road closure is evaluated during sale prep and at the end of the timber sale for closure. Some roads may be closed by gates (seasonally) while other roads may be blocked to vehicular access. Vacation of roads is planned where there is a resource concern (legacy roads and log culverts) or no future management is planned.

T & E Species Considerations

COMMENT: Clearcuts should be prohibited in all identified suitable habitat for these (NSO and murrelets) threatened species on all districts.

COMMENT: Potential MAMU and spotted owl habitat should be reserved.

RESPONSE: All timber sales are evaluated for potential habitat for murrelets and Northern Spotted Owls by the Area Biologist. Sale areas and adjacent habitat (100 meters for murrelets) considered potentially suitable habitat is surveyed to Protocol and surveys results evaluated at the end of each year. Suitable NSO habitat for the purpose of determining whether to survey or not includes "low quality" habitat that is 12-17" diameter stands. Any timber sales found to be occupied by Northern Spotted Owl or murrelets are evaluated by Area Biologist and modified by Unit Forester to comply with all laws and policies. Biological Assessments are completed for any sale operating within owl circles or Marbled Murrelet Management Areas.

COMMENT: Rackheap Falls has many active MM nest sites. Cancel this one, too.

RESPONSE: The sale does not include any areas occupied by Marbled Murrelets. A Marbled Murrelet Management Area will be designated (adjacent to the sale) at the end of the second year surveys in 2005 and any additional modification to the sale boundary will be done at that time.

COMMENT: Encourage ODF to continue efforts to establish more large conifer trees in the streams and provide habitat for native fish.

RESPONSE: To establish and quickly grow conifer species, removal of hardwood dominated areas is more effective than thinning hardwood species. ODF works with ODFW to look for opportunities to establish conifers in riparian areas. The on-going Watershed Analysis reviews riparian conditions and identifies areas deficient in large woody debris.

Recreation Resources

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

RESPONSE: The restoration of trails is part of the timber sale contract provisions. The cost of trail restoration is factored into timber sale appraisals. Post-harvest clean-up and restoration of trails is completed in consultation with District Recreation Coordinator and OHV Coordinator. At this time, south Fork crews are better used on non-motorized trail construction.