

District Name	Comment Summary	District Response
1. Physical Description of Operation Area		
Astoria	Bigfoot Combination - Sale areas #1, 4, 7, & 9 comprise of mature native, mixed species indicative of natural conditions and therefore should be retained in their present condition.	The Implementation Plan (IP) for the Gnat Basin plans the areas within all of these sale areas for DFC of "general." Other areas within this basin are planned for more complex stand structures.
Astoria	Cole Mountain - Due to the current UDS/Layered conditions within Area #2 and yet its DFC of LYR, Area #2 should be removed from the sale.	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 this entire stand 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.
Astoria	McKnob - Area #7 should be removed from the sale due to its rarity as a "structurally diverse younger stand".	Area 7 is a "first entry" thinning into planted/seeded stands with variable stocking. Current stand structures are CSC and UDS. The planned harvest would remove about 50% of the overstory canopy, allowing residual trees to grow larger faster and allowing sunlight to reach the forest floor, promoting growth of understory saplings and shrubs. This operation will maintain and enhance the structural diversity of the stand over time.
Astoria	Sheep Shack - Those regions of Areas #3 & 4 which present any slope stability hazard must be removed from the sale to protect the upper Rock Creek SAH area.	An initial hazard and risk assessment was completed by the ODF geotechnical specialist, and was determined that portions of Areas 3 and 4 are a moderate hazard and risk category along the tributary to Rock Creek. If high landslide hazard locations are identified during fieldwork the geotechnical specialist will be consulted.
Astoria	Shingle Mill Road - Sale should be dropped due to presence of complex stands and trees 75+ years of age.	A completed Stand Level Inventory of these sale areas indicates they are not in a complex condition (LYR or OFS). Area 1 has a desired future condition of General and has been targeted for regeneration (REG) to meet Implementation Plan goals for the Gnat Basin. Area 2 is planned for more complex stand structures and will be partial cut. Additionally, the FMP contains forest management strategies based on stand structure, not stand age.
Astoria	West Hunt Creek - Eliminate Areas #1 & 2 from the sale, they already have the age class and snag component to qualify as OFS.	Areas 1 and 2 are both partial cut units. Area 1 and portions of Area 2 have DFC of LYR. It is currently a Closed Single Canopy (CSC) structure, with a Desired Future Condition (DFC) of Layered (LYR). In order to move this stand toward its DFC of LYR, some of the overstory canopy must be removed to allow sunlight to reach the forest floor and enable growth of understory saplings and shrub species.
Coos	"You mention there are "three structures of concern along Carlson road" but do not adequately identify them. Are you counting the Boylan house on the south side of the road as one of the three or are you identifying the structure on our property, (I think Norma calls it the "tree house") the empty dwelling next to it and the large Carlson house? It is incorrect to call our structure "a part-time recreational dwelling." It is permitted by Douglas County as an agricultural building, used as a workshop, studio and emergency shelter"	The AOP will be corrected to refer to the structure as an agricultural building. The most westerly structure referenced is the Bolyon house, as shown on the key resource map, the slope above the house is excluded from the timber sale. The next house to the east is the agricultural building, the slope above it is also excluded from the sale. The third house to the east is the empty residence, the slope above this house is also excluded, although a portion of the area upslope is privately owned.
Klamath-Lake	Four Corners Timber Sale is too close to the Sun River Corridor. It cuts across it in 2 places.	The boundary of the Sun Creek corridor will be determined during layout of the sale boundaries on the ground according to guidance articulated in the FMP. No changes necessary

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Tillamook	Area I is the watershed of West Coal Creek and contains several of its tributaries.	West Coal Creek is located outside the sale boundaries and was not mentioned in the Pre-Op report. Unnamed tributaries to West Coal Creek are within the sale boundary and will be protected under FMP requirements. The map shows all these streams as Type F, which is incorrect, and will be corrected in the final version of the document.
Tillamook	The number of species of shrubs, herbs, grasses is way low.	The plants included in the document refer to those plants listed in the Stand Level Inventory plant list. It is not intended to give a complete inventory list of the sale area.
Stand Summary		
Astoria	Inventory - The OPS Plans prioritize timber inventories immediately prior to an area being logged. This means that the inventory will be quickly outdated because of the logging operation which will make it very difficult to truly determine what the habitat looks like post harvest. REQUESTED CHANGE IN THE OPS PLANS – ODF should conduct inventories after the sale has been logged so that a true long-term understanding of the habitat in that area can be charted over time.	The current State Forests policy is to re-do the Stand Level Inventory (SLI) within three years after harvesting has occurred.
3. Desired Future Condition		
Astoria	Bigfoot Combination - DFC's for Areas #1, 4, 7 & 9 should be changed to OFS.	The current IP has already been adopted and these areas have DFC of "general."
Astoria	Northrup Quarry - Area #1: remove from sale because much of it is already Layered and the current condition in Northrup Basin is 9% Layered with a DFC of 36%.	Area 1 has a current condition of Understory (UDS). In order to move this stand toward its Desired Future Condition (DFC) of Layered (LYR), some of the overstory canopy must be removed to allow sunlight to reach the forest floor and enable growth of understory saplings and shrub species.
Coos	"...all trees 100 years old or older be allowed to mature into old growth."	This comment is beyond the scope of the annual operations plan. It is an appropriate comment for the development of the Elliott Management Plan and HCP and will be passed along to the Elliott Core Planning.

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Coos	<p>We noticed that for the first time in the AOPs you gave a “Target” for GTR in Table 2 of the Pre-Operations Report. It indicated that you will leave the average DBH and Age of the original stand. While this is an improvement over what we saw in Lone Surprise, we don’t understand why you wouldn’t want to leave the biggest and oldest of the original stand. This would best meet the GTR purpose in the HCP. In any case, you should never again cut any more 500 year old trees in your timber sales.</p>	<p>Selection of green trees in a timber sale is composed of two main elements: suitability for trees as a wildlife tree (size, decay, and limb size), windfirmness, as well as the overall operability of the sale. The location of residual green trees cannot endanger the workers in the logging operation. We keep them away from landings and difficult yarding areas. With these constraints in mind, we select those trees that are the most windfirm, often equating to the larger trees in the stand, as well as trees with the most interesting habitat characteristics. We also try to leave a selection of minor species in the stand, such as hemlock, cedar, and maple. It is the current district policy to retain remnant old growth within a stand, with the understanding that these are unique trees with unique wildlife qualities. But we can’t protect those old growth that are in dangerous proximity to a landing, those trees often have substantial decay, snag tops and snag limbs and would violate OSHA standards. Fortunately, not many remnant old growth trees are located near landings.</p> <p>Because of these constraints, and the fact that the field work for the sales have not been accomplished, we state that we will leave an average diameter for retention. Those trees making up that selection are some of the largest of the stand, as well as others with unique wildlife qualities.</p>
Coos	<p>"I understood that Oregon was working toward creating a larger percentage of old growth structure on State Lands and that older trees would not be cut until we reached a percentage of large older trees on state lands that approximated the percentage of land in large trees before Europeans undertook major logging. How does this plan for 2005 fit into the overall plan and meet long term goals?"</p>	<p>The older stands referenced in this comment are those required to meet our Nesting, Roosting, Foraging (NRF) requirement for spotted owls. The Elliott is working toward this goal and is in compliance with its HCP and ITP. The requirements in these documents specify that over time from 12-66% of each management basin will be maintained in Nesting Roosting Foraging (NRF) habitat for the spotted owl. No NRF will be harvested until the NRF habitat in the basin reaches the required level. That level of habitat will then be maintained over time. In the long-term, 39,781 acres (43% of the forest) will be maintained in NRF habitat. The required percentages are being adhered to for each management basin. The mature habitat that is currently being harvested, is located in management Basins that have current habitat in excess of the required target.</p>
Coos	<p>"Do not create new plantations by clearcutting older forests."</p>	<p>This comment is beyond the scope of the annual operations plan. It is an appropriate comment for the development of the Elliott Management Plan and HCP and will be passed along to the Elliott Core Planning.</p>
Coos	<p>In the past, the Green Tree Retention (GTR) in mature forest clearcuts have reserved trees two small and not represented of the cut trees. For instance, in the Lone Surprise timber sale, large old-growth trees were cut, but within the old-growth groves, not one of the older trees was retained for GTR.</p>	<p>The comment regarding Lone Surprise is in reference to a sale in a 2004 sale plan, those old growth trees specifically addressed were in close proximity to the road and planned landing. We did save several old growth trees (and a nice old growth snag) further down into the sale.</p>

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Tillamook	I would urge that the assets of this forest be fully utilized by a long range goal that moves it on to an older growth stand.	This operation area has many characteristics of a complex stand. The planned commercial thinning will maintain a variety of diameters in the stand after harvest and reduce the density to allow individual tree growth to continue. The long term goal is to keep this stand on the landscape and move it into a desired future condition complex.
Tillamook	Ask that you withdraw this area from the sale in order to protect because the area is well on its way to a LYR/OFS structure.	Stand Level Inventory has been completed on the sale area showing it has many characteristics of LYR except for the diameter density index. Through the operation, certain diameter classes may be targeted for removal and others retained in the stand. Some underplanting and natural seeding will also establish another stand layer at the smaller diameter classes. Thinning the stand will allow more growing space for residual trees to create the upper end diameter classes.
4. Proposed Management Prescription		
Astoria	Hill Road Alder - To minimize loss of hardwood, the sale area should be (a) thinned, not clearcut (b) planned for retention of the 'biggest and best' alder, and (c) under-planted with spruce and hemlock.	This sale has a desired future condition of General and has been targeted for regeneration (REG) to meet Implementation Plan goals for the North Fork Basin. Other areas within this basin are planned for more complex stand structures, goals, and objectives for the basin.
Astoria	Management in Closed Single Canopy - The closed single canopy (CSC) stand structure should be thinned in certain circumstances to allow for the diversity of older forest attributes that are good for fish and wildlife. The Astoria District, for example, is going to intensively thin the CSC areas in order to reach the desired future condition target of 18%. It appears, however, that these CSC areas are targeted to become clear-cuts rather which does not speed up the goal of reaching older forest structures. REQUESTED CHANGE IN THE OPS PLANS – ODF should thin CSC with a goal of creating complex structures to will allow for both timber revenue and wildlife habitat. The OPS Plans should shift focus away from clear-cut logging.	The FMP was developed with significant scientific and public review, which included a great deal of discussion regarding the long term effects of the plan. Under the FMP, the harvest prescriptions are designed to provide a number of outputs across the landscape and overtime, including revenue, stand structure, forest health, recreation, and wildlife habitat.
Astoria	Logging in older forests - Select timber sales in the OPS Plans take place in older forests - such as the West Hunt Creek sale in a 95 year-old mixed conifer stand. There is no reason for ODF to further limit the habitat values of the forest by logging stands that survived the forest fires and the early logging of the 1930's. The older trees provide valuable and rare habitat for fish and wildlife that depend on such habitat for survival. REQUESTED CHANGE IN THE OPS PLANS – ODF should not log trees that are already over 70 years old, and also should not log trees that are over 32 inch diameter at breast height.	The FMP was developed with significant scientific and public review, which included a great deal of discussion regarding the long term effects of the plan. Under the FMP, the harvest prescriptions are designed to provide a number of outputs across the landscape and overtime, including revenue, stand structure, forest health, recreation, and wildlife habitat.

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Astoria	<p>Timber Sale Comments -- Logging in Northern Spotted Owl Strum Creek Home Range - ODF is in clear violation of an agreement with the United States Fish and Wildlife Service (US FWS) to protect the Northern Spotted Owl in the Tillamook and Clatsop State Forests. This agreement was created because of the serious negative impact of a past logging operation to the Strum Creek Northern Spotted Owl pair. To compensate for the problems that past logging operations caused the owl, ODF signed an agreement with the US FWS to be extra sensitive in the Strum Creek Home Range. REQUESTED CHANGE IN THE OPS PLANS – ODF should not log in the Strum Creek Northern Spotted Owl home range. If ODF insists on logging trees younger than 40 years ODF should only do a light thinning of SDI 40% or higher and should only do so if approved by the US FWS.</p>	<p>Astoria district proposed the Crawford Ridge timber sale in a stand consisting of even aged plantations, growing more dense, with increasingly less suitable habitat over time for NSO's. In accordance with the Agreement for the Conservation of Northern Spotted Owls between ODF and USFWS, the proposed sale areas were reviewed with 2 ODF biologists, 1ODFW biologist, 1USFWS biologist and Astoria District Staff. This group reached a consensus that the prescription proposed for these plantations would improve owl habitat in the area. Subsequently, a proposal to modify the Agreement for the Conservation of Northern Spotted Owls has been negotiated and is in processing for signatures. This modification will allow thinning in stands that may become greater than 40 years old during the harvesting activity.</p>
Astoria	<p>Questions/Concerns Regarding Specific Basins - GNAT: Approximately 1500 of the total acreage of 10,020 is scheduled for harvest in the coming year, or 15% of the total acreage available. This level seems excessive for one year.</p>	<p>As a result of the Department clarifying with legislators the intent of a budget note directing the agency to temporarily operate at the high end of its management range, harvest objectives on the Astoria District were reduced. This resulted in switching McKnob (915 acres) from a primary operation to an alternate operation, and switching Shingle Mill Road (149 acres) from an alternate operation to a primary operation. Therefore, in the final Astoria District AOP, there are plans to operate on 728 acres, or 7%, of the Gnat Basin.</p>
Astoria	<p>Questions/Concerns Regarding Specific Basins - QUARTZ: With the cuts proposed in the latest AOP, this basin will have had approximately 31% of its total acreage cut during the period FY 01-05. This is higher than any other basin. Is there an explanation why this basin is being targeted so heavily?</p>	<p>Between FY01-FY05, approximately 23% of the basin is planned to be operated on. Only 5% of these acres are clearcut, while 18% of these planned harvests will be partial cuts. These harvest levels are in line with the FMP and IP. The level of activity in the Quartz Basin during the FY01-05 period is a response to the abundance of dense, overstocked stands that were in need of thinning and the low level of existing REG stands. Between FY01-FY05, there has been approximately 1,974 acres (453 acres clearcut, and 1,521 acres partial cut) in the Quartz Basin. The Lost Fire Combination sale is in the new "Lost Lake Parcel" recently acquired from the Longview Fibre Exchange, which added approximately 2,100 acres to the Quartz Basin.</p>
Astoria	<p>Cole Mountain - A component of hardwoods should be retained throughout the sale area.</p>	<p>FMP riparian strategies will be followed in all harvest areas, which will result in the retention of a significant component of hardwoods within the sale areas.</p>
Astoria	<p>Hambone - Area #4 should consist of thinning only: leaving the 'biggest and best' hardwood and conifer species.</p>	<p>Area 4 has been dropped from the Astoria District's final AOP as a result of the Department clarifying with legislators the intent of a budget note directing the agency to temporarily operate at the high end of its management range. This clarification reduced the harvest objectives on the Astoria District. .</p>
Astoria	<p>Knotty Nic - Areas #1, 4 & 7 should be changed to thinning while retaining the 'biggest and best' of all species including hardwoods.</p>	<p>Areas 1, 4, & 7 have a desired future condition of General and has been targeted for regeneration (REG) to meet Implementation Plan goals for the Plympton Basin. Other areas within this basin are planned for more complex stand structures, goals, and objectives for the basin.</p>
Astoria	<p>Knotty Nic - Area #5 should have some component of alder retained.</p>	<p>All trees within 25 feet of non-fish bearing, perennial streams must be retained under the FMP. Therefore, a significant number of alders will be retained, since they are adjacent to these small streams. Additionally, some alders within the thinned conifer stand may also be retained, where they do not compete with crowns of some conifer trees.</p>

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Astoria	Lost Fire - Areas #1, 2 & 5 should only be lightly thinned and managed by retaining the 'biggest and best' of all species including hardwoods.	Areas 1, 2, and 5 have desired future conditions of General and have been targeted for regeneration (REG) to meet Implementation Plan goals for the Quartz Basin. Other areas within this basin are planned for more complex stand structures to meet the basin goals.
Astoria	Lotta Thin - Area #2 should be removed from the sale and allowed to reach DFC of OFS on its own.	In order to move this stand toward its Desired Future Condition (DFC) of Older Forest Structure (OFS) in an accelerated time frame with active management consistent with the FMP, some of the overstory canopy must be removed to allow sunlight to reach the forest floor and enable growth of understory saplings and shrub species.
Astoria	McKnob - Area #8 should be removed from the sale and allowed to reach its DFC of Layered on its own accord while retaining its importance as an elk calving area.	Area 8 is a initial entry thinning of mixed conifer plantations which have reached merchantable size. The planned harvests would remove about 50% of the overstory canopy, with similar results to those described for Area 7. With active management consistent with the FMP, we can create the DFC of layered (LYR) in this stand in an accelerated manner. As reviewed by an ODFW big game biologist, there will be no significant impacts to the elk calving area.
Astoria	Military Green - Area #4 should be removed from the sale and allowed to reach its DFC of OFS on its own.	In order to move this stand toward its Desired Future Condition (DFC) of Older Forest Structure (OFS) in an accelerated time frame with active management consistent with the FMP, some of the overstory canopy must be removed to allow sunlight to reach the forest floor and enable growth of understory saplings and shrub species.
Astoria	Osweg Alder - Retain 'biggest and best' alder, all maple and under-plant with mixed conifer	This sale has a desired future condition of General and has been targeted for regeneration (REG) to meet Implementation Plan goals for the Buster Basin. Other areas within this basin are planned for more complex stand structures, goals, and objectives for the basin.
Astoria	Sheep Shack - All areas should have no more than a moderate partial cut and Area #3 should be allowed to mature naturally.	In order to move these stands toward their Desired Future Condition (DFC) of Older Forest Structure (OFS) and Layered (LYR), some of the overstory canopy must be removed to allow sunlight to reach the forest floor and enable growth of understory saplings and shrub species. Allowing for a heavy thinning in Areas 1, 3, and 4 will move these stands toward their DFC more rapidly and will reduce the number of harvest entries need to meet the DFC goals for these stands. The moderate thinning of Area 2 is done to allow for stand variation in the landscape over time.
Astoria	Steeple Chase - Area #4 is currently UDS, yet its DFC is "General"; modify harvest in Area #4 to Moderate/Partial cut.	Area 4 has a desired future condition of General and has been targeted for regeneration (REG) to meet Implementation Plan goals for the Louisignot Basin. Other areas within this basin are planned for more complex stand structures.
Astoria	Steeple Chase - Area #3, with steep slopes, should be harvest-modified to negate any impact to the SAH area.	The sale areas were reviewed by the geotechnical specialist The initial hazard and risk assessment from the geotechnical specialists is low. The topographic map indicates some steep slopes in the northern portion of Area 3. If High Landslide Hazard Locations are identified during the field work, or if the prescription of Areas 2 or 3 changes to clearcut, the geotechnical specialist will be consulted.
Astoria	West Hunt Creek - There is absolutely no excuse for harvesting trees in this age class (95+ years)	Area 1 is a partial cut, to be thinned to an approximate relative density range of 30-35, which will maintain and enhance the existing complexity and diversity of the existing stand. Generally, all the biggest and best trees will be retained in this thinning area. Additionally, the FMP contains forest management strategies based on stand structure, not stand age.

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Cascade	The prescription for Area III of Polly Stout Combo calls for a modified clearcut. New road construction and the removal of all the trees on the eastern border of this unit could increase the likelihood of soil erosion and increased turbidity in the stream that flanks the unit. If this portion of the sale were to be changed to a thin or retention cut, the possible negative impact on water quality could be greatly reduced.	Water Quality protection is mandated by both federal and state laws. The Oregon Forest Practices rules are approved as sufficient to implement water quality standards under the federal Clean Water Act. The Aquatic and Riparian Standards listed in Appendix J of the FMP will be followed when posting the stream buffers within Polly Stout. These standards will meet or exceed the Oregon Forest Practices rules.
Coos	"I fully support the Elliott's 2005 Operation plan."	This statement is commentary and contains no recommendations.
Coos	"I would like to urge you to not log the half of the Elliott that has not been logged. It contains the biggest and oldest trees on any Oregon state forest -- 140 years old and over 200 feet tall. It is some of the best Marbled Murrelet and Spotted Owl habitat left on the central Oregon coast."	This comment is beyond the scope of the annual operations plan. It is an appropriate comment for the development of the Elliott Management Plan and HCP and will be passed along to the Elliott Core Planning.
Coos	"The ODF could get plenty of logs from thinning young plantations." Don't use shorter rotations in your plantations.	This comment is beyond the scope of the annual operations plan. It is an appropriate comment for the development of the Elliott Management Plan and HCP and will be passed along to the Elliott Core Planning.
Coos	"Instead of the Ash Valley School sale, consider a hiking trail, with lessons on how forests provide clean air and drinking water. Why is there no hiking trail maintenance with the projected net revenue of 9.1 million dollars from this year's logging?"	This comment is not consistent with our land classification for this area, which is scenic production and not scenic conservancy. We do not have hiking trail maintenance in this AOP because we currently have no formal hiking trails in the Elliott. The goal of the Elliott State Forest is to maximize revenue to the common school fund over the long run.
Coos	A 1997 ODF study found that clearcutting doubles the chances of a landslide. But this year the ODF claims that "clearcut harvesting increases summer flows" so "can be viewed as a benefit to fish and aquatic amphibians". Finding that clearcutting high landslide hazard slopes are good for endangered salmon is controversial to put it mildly. I think that ODF should have this finding peer reviewed."	This comment is beyond the scope of the annual operations plan. It is an appropriate comment for the development of the Elliott Management Plan and HCP and will be passed along to the Elliott Core Planning.
Coos	Please reconsider the state's plan to log old growth in our forest	"Old growth" is not being proposed for harvest in the 2005 sale plan, the harvest of mature timber that is being planned is allowed in the Elliott's HCP, FMP, and ITP.
Coos	Opposed to clearcut logging 653 acres for the 2005 AOP. Within the plan are 400 acres of the oldest trees....delete these proposals.	The goal for managing the Elliott State Forest is to maximize revenue to the common school fund over the long run. Clearcutting is an important silvicultural tool in achieving this goal and managing state forest lands. Clearcut levels are determined by the HCP, FMP, and ITP.
Coos	Stop logging the oldest trees in the Elliott state forests.	This comment is beyond the scope of the annual operations plan. It is an appropriate comment for the development of the Elliott Management Plan and HCP and will be passed along to the Elliott Core Planning.

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Coos	"Stop using short rotations that will fail to let forests mature before they are logged. Use the long timber rotation method."	The Habitat Conservation Plan (HCP) and Incidental Take Permit (ITP) is based on a series of mitigation measures and measures to avoid take of the Northern spotted owl. The underlying principles of these mitigation measures are based on maintaining spotted owl nesting, roosting and foraging (NRF) habitat and dispersal habitat. These habitat requirements as well as the network of reserves across the forest and specific habitat structure requirements in harvest units provide the basis for the plan. The habitat requirements are implemented in a percentage requirement for each basin, resulting essentially in a rotation age for each basin. Longer rotation basins having a fairly high habitat requirement (50% and higher) and shorter rotation basins having a lower habitat requirement of around 17% (reserves in basins). The dispersal requirement is met for each basin and is the 50-11-40 rule (50% of the basin is required to have an average of 11 inches in diameter with a crown closure of 40%). The main criteria used for assessing our fulfillment of the HCP and ITP is our maintenance of
Coos	no clearcuts in the Elliott State Forest	This comment is beyond the scope of the annual operations plan. It is an appropriate comment for the development of the Elliott Management Plan and HCP and will be passed along to the Elliott Core Planning.
Coos	"Please consider thinning operations in managed plantations instead of clearcuts."	This comment is beyond the scope of the annual operations plan. It is an appropriate comment for the development of the Elliott Management Plan and HCP and will be passed along to the Elliott Core Planning.
Coos	Young stands in the 240 long-rotation watershed basins cannot be clearcut, including the 38 year old, 82 acre Middle Elk proposed sale in Management Basin 17, a 240-year rotation watershed. The Middle Elk sale should be thinned instead of clearcut.	The Habitat Conservation Plan (HCP) and Incidental Take Permit (ITP) is based on a series of mitigation measures and measures to avoid take of the Northern spotted owl. The underlying principles of these mitigation measures are based on maintaining spotted owl nesting, roosting and foraging (NRF) habitat and dispersal habitat. These habitat requirements as well as the network of reserves across the forest and specific habitat structure requirements in harvest units provide the basis for the plan. The habitat requirements are implemented in a percentage requirement for each basin, resulting essentially in a rotation age for each basin. Longer rotation basins having a fairly high NRF habitat requirement (50% and higher) and shorter rotation basins having a lower habitat requirement of around 17% (reserves in basins). The dispersal requirement for each basin is the 50-11-40 rule (50% of the basin is required to have an average of 11 inches in diameter with a crown closure of 40%). The main criteria used for assessing our fulfillment of the HCP and ITP is our maintenance of the minimum
Coos	It is clear that (thinning, this is commentors language, probably meant to say clearcutting) 40 year old stands is not in compliance with the Elliott's Forest Management Plan. These stands must be dropped from the 2005 AOP, or their prescription changed to thinning.	The Elliott currently has an unbalanced age distribution, approximately 45% of the forest is in stands 0-55 years in age and about 46% of the forest is in stands 85-145 years in age, leaving a gap in the 55 to 85 year range. To produce a sustainable, even flow of timber, these age classes need to be better distributed over time. A number of stands in the second decade of the plan have been identified as clearcut units to achieve this goal. While the HCP does not speak to this issue directly, it does not limit accomplishing this objective. The following sales that you list: Curvy Pucket, Middle Elk, Double Barrell, and Ash Valley School, are all in this category.

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Coos	Not one acre of thinning is in the 2005 AOP because Coos District is anticipating a new FMP and expects the new plan to “require some of these stands to be clearcut in the next decade”. This is not a good excuse to eliminate needed and required thinning, especially to eliminate all thinning without an analysis of what needs to be thinned under the current FMP. How many acres of managed plantations over 30 years old are there and in which basins? The October 2003 watershed analysis should have given us this information and you should have used it to determine what to thin.	The district was extremely aggressive in pursuing thinning opportunities up to the 2002 sale plan. Currently we are cutting some of those age class stands to balance the age class distribution as stated above. However, the primary reason for the lack of thinning is a gap in need, there are many stands in the 25 year bracket that have not met the silvicultural and economic criteria that would trigger a decision to commercially thin. The criteria are primarily average tree diameter and stand density. Many stands in this age group were pre-commercially thinned rather heavily, pushing off the commercial thinning point even further. As thinning is needed and appropriated in future sale plans, we will plan and conduct it
Coos	The young forest in the unit (comment references Ash Valley School) should be thinned, not clearcut.	Clearcutting this stand while leaving the buffer strip and Green Tree Retention is consistent with our scenic production land classification for this area
Forest Grove	Cancel the Scoggins Combo Sale.	The final AOPs for Forest Grove, Tillamook, and, Astoria districts have lower output than the draft plans that were reviewed during the public comment period. The reduction came as a result of clarifying legislative consultation and less-than-expected resources. The Harvest and Habitat Modeling Project, scheduled for completion in spring 2005, will provide a foundation to establish sustainable harvest levels. Updated forest inventory information and field-reviewed projected outcomes will better inform the debate about state forests in the future.
Klamath-Lake	In management activities will root rot be managed by avoiding disturbance in affected areas? New research is available in this area, which discusses new management approaches for root rot.	This comment refers to the Pokegama Timber Sale. The district plans to consult with the Department forest pathologist to identify the root disease and take appropriate action. The most current and relevant research will be used.
Southwest Oregon	Trees over 11 inches diameter must be left uncut.	The current diameter distribution and density levels of dead trees require the thinning of trees over 11 inches in diameter to restore a healthy forest condition, to prevent further insect and disease outbreaks, and to reduce the continued likelihood of catastrophic wildfire.
Southwest Oregon	Trees must not be more than 30 feet apart.	It is unlikely that live tree spacing exceeding 30 feet will occur as a result of this operation. However, due to the randomness of the fire, the current configurations of healthy and living trees, and the natural variation of forest stands, forest managers must retain the flexibility to manage these stands appropriately to achieve the desired condition. The desired condition in this instance is the restoration of healthy, vigorous stands resistant to catastrophic loss due to insects, disease, or continued wildfire.

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Southwest Oregon	Partial clearcuts must not exceed 5 acres.	It is unlikely that partial clearcuts exceeding 5 acres will occur as a result of this operation. However, due to the randomness of the fire, the current configurations of healthy and living trees, and the natural variation of forest stands, forest managers must retain the flexibility to manage these stands appropriately to achieve the desired condition. The desired condition in this instance is the restoration of healthy, vigorous stands resistant to catastrophic loss due to insects, disease, or continued wildfire.
Southwest Oregon	You always take the big trees leaving the little crappy trees.	The prescriptions designed for these stands will leave trees in all diameter classes including the reservation of all trees larger than 30 inches in diameter. These prescriptions will conserve the natural range of variability for forest stands in this region while promoting the health and vigor of the residual trees.
Southwest Oregon	Trees over 11 inches dia. Should not be cut.	The current diameter distribution and density levels require the thinning of trees over 11 inches in diameter to promote the development of complex stand structure, to prevent insect and disease outbreaks, and to reduce the likelihood of catastrophic wildfire.
Southwest Oregon	It is a high windthrow area with blow downs everywhere...	While windthrow in these soil types has been documented to occur in the Douglas County Soil Survey, no evidence of blowdown has been observed on State Ownership or in surrounding partially harvested areas.
Tillamook	The area is well on its way to LYR/OFS without any need for active management	Stand Level Inventory has been completed on the sale area showing it has many characteristics of LYR except for the diameter density index. Through the operation, certain diameter classes may be targeted for removal and others retained in the stand. Some underplanting and natural seeding will also establish another stand layer at the smaller diameter classes. Thinning the stand will allow more growing space for residual trees to create the upper end diameter classes.
5. Estimated Resource Outputs		
Astoria	The Astoria District 2005 AOP as presented sets targets above those allowed by the Astoria IP for conifer and hardwood regeneration harvest. Recent news articles question the feasibility of these plans as written. Any changes made to the AOP must undergo public comment before being finalized.	After clarifying the expectations with legislators regarding the budget note directing harvests at the high-end range of our Implementation Plan objectives. The harvest objectives in Astoria's final draft AOP were reduced by 21% (partial cuts reduced from 3,048 acres to 2,362 acres and regeneration harvests reduced from 1,247 acres to 1,007 acres) compared to the draft released for public comments. All planned partial cut and regeneration harvest operations for FY05 are within the ranges set for activities in the Astoria District IP prior to the approval of the minor modification.

District Name	Comment Summary	District Response
Astoria/Forest Grove/ Tillamook	By the Department's own admission, the proposed plan is 33% above previously planned levels, all because of a note tacked onto the budget, and under the radar of public discourse. This proposal would essentially double logging on state-owned forest land in just a few years time. The ODF should not embark on this course. The Legislative Fiscal Office made that abundantly clear last week. The ODF should comply with that direction and scale back the logging to the earlier levels, if not more.	The final 05 AOPs for Forest Grove, Tillamook and Astoria districts have lower output than the drafts. The reduction came as a result of clarifying legislative consultation and less-than-anticipated staffing. The Harvest and Habitat Modeling Project, scheduled for completion in spring 2005, will provide a foundation to establish sustainable harvest levels. Updated forest inventory information and field-reviewed projected outcomes will better inform the debate about state forests in the future.
Astoria/Forest Grove/ Tillamook	The AOP's should clearly state that based on the current Implementation Plans, the harvest levels proposed for 2005 (and presumably 2006) are not sustainable for the remaining life of the Implementation Plan (i.e. 2011). The changes to the regeneration acres harvest level range in the Astoria and Forest Grove Districts' Implementation Plans should be rescinded. (See pg. 4 – Astoria District AOP.)	The final 05 AOPs for Forest Grove, Tillamook and Astoria districts have lower output than the drafts. The reduction came as a result of clarifying legislative consultation and less-than-anticipated staffing. The Harvest and Habitat Modeling Project, scheduled for completion in spring 2005, will provide a foundation to establish sustainable harvest levels. Updated forest inventory information and field-reviewed projected outcomes will better inform the debate about state forests in the future.
Astoria/Forest Grove/ Tillamook	Harvest increase too high. Find a better balance.	The final 05 AOPs for Forest Grove, Tillamook and Astoria districts have lower output than the drafts. The reduction came as a result of clarifying legislative consultation and less-than-anticipated staffing. The Harvest and Habitat Modeling Project, scheduled for completion in spring 2005, will provide a foundation to establish sustainable harvest levels. Updated forest inventory information and field-reviewed projected outcomes will better inform the debate about state forests in the future.
Astoria/Forest Grove/ Tillamook	In the Forest Grove, Astoria, and Tillamook Districts, clearcut harvest levels are higher than specified in the IP's. ODF must explain in the AOP's how an increase in clearcut harvest will impact the timeline to reach the stand structure objectives of the IP's and FMP. ODF should minimize its emphasis on clearcuts and create balance in timber management that considers the needs of fish and wildlife.	The final 05 AOPs for Forest Grove, Tillamook and Astoria districts have lower output than the drafts. The reduction came as a result of clarifying legislative consultation and less-than-anticipated staffing. The Harvest and Habitat Modeling Project, scheduled for completion in spring 2005, will provide a foundation to establish sustainable harvest levels. Updated forest inventory information and field-reviewed projected outcomes will better inform the debate about state forests in the future.
Astoria/Forest Grove/ Tillamook	AOL urges ODF to increase FY05 harvest levels beyond the proposed 32% to 272 mmbf for Forest Grove, Astoria, and Tillamook Districts.	The final 05 AOPs for Forest Grove, Tillamook and Astoria districts have lower output than the drafts. The reduction came as a result of clarifying legislative consultation and less-than-anticipated staffing. The Harvest and Habitat Modeling Project, scheduled for completion in spring 2005, will provide a foundation to establish sustainable harvest levels. Updated forest inventory information and field-reviewed projected outcomes will better inform the debate about state forests in the future.

District Name	Comment Summary	District Response
Astoria/Forest Grove/ Tillamook	The Department should scale back harvest levels to 221 mmbf.	The final 05 AOPs for Forest Grove, Tillamook and Astoria districts have lower output than the drafts. The reduction came as a result of clarifying legislative consultation and less-than-anticipated staffing. The Harvest and Habitat Modeling Project, scheduled for completion in spring 2005, will provide a foundation to establish sustainable harvest levels. Updated forest inventory information and field-reviewed projected outcomes will better inform the debate about state forests in the future.
Astoria/Forest Grove/ Tillamook	The AOP's should state that FY05 harvest levels are not sustainable.	The final 05 AOPs for Forest Grove, Tillamook and Astoria districts have lower output than the drafts. The reduction came as a result of clarifying legislative consultation and less-than-anticipated staffing. The Harvest and Habitat Modeling Project, scheduled for completion in spring 2005, will provide a foundation to establish sustainable harvest levels. Updated forest inventory information and field-reviewed projected outcomes will better inform the debate about state forests in the future.
Astoria/Forest Grove/ Tillamook	Opposed to 38% increase in harvest levels.	The final 05 AOPs for Forest Grove, Tillamook and Astoria districts have lower output than the drafts. The reduction came as a result of clarifying legislative consultation and less-than-anticipated staffing. The Harvest and Habitat Modeling Project, scheduled for completion in spring 2005, will provide a foundation to establish sustainable harvest levels. Updated forest inventory information and field-reviewed projected outcomes will better inform the debate about state forests in the future.
Astoria/Forest Grove/ Tillamook	Opposed to increase in harvest levels. Reduce harvest levels to no more than 100 mmbf.	The final 05 AOPs for Forest Grove, Tillamook and Astoria districts have lower output than the drafts. The reduction came as a result of clarifying legislative consultation and less-than-anticipated staffing. The Harvest and Habitat Modeling Project, scheduled for completion in spring 2005, will provide a foundation to establish sustainable harvest levels. Updated forest inventory information and field-reviewed projected outcomes will better inform the debate about state forests in the future.
Astoria/Forest Grove/ Tillamook	The dramatic increase in logging will produce a boom and bust economy that is certain not to sustain long-term financial benefits to the State of Oregon	The final 05 AOPs for Forest Grove, Tillamook and Astoria districts have lower output than the drafts. The reduction came as a result of clarifying legislative consultation and less-than-anticipated staffing. The Harvest and Habitat Modeling Project, scheduled for completion in spring 2005, will provide a foundation to establish sustainable harvest levels. Updated forest inventory information and field-reviewed projected outcomes will better inform the debate about state forests in the future.

District Name	Comment Summary	District Response
Astoria/Forest Grove/ Tillamook	REQUESTED CHANGE IN THE OPS PLANS - ODF must explain in the OPS Plans exactly how the increase in clear-cuts will impact the time-line to reach the ten and fifty year objectives of the Implementations Plans and the Forest Management Plan.	The final 05 AOPs for Forest Grove, Tillamook and Astoria districts have lower output than the drafts. The reduction came as a result of clarifying legislative consultation and less-than-anticipated staffing. The Harvest and Habitat Modeling Project, scheduled for completion in spring 2005, will provide a foundation to establish sustainable harvest levels. Updated forest inventory information and field-reviewed projected outcomes will better inform the debate about state forests in the future.
Astoria/Forest Grove/ Tillamook	ODF should minimize its emphasis on clear-cuts and create a balance in timber management that considers the needs of fish and wildlife.	The final 05 AOPs for Forest Grove, Tillamook and Astoria districts have lower output than the drafts. The reduction came as a result of clarifying legislative consultation and less-than-anticipated staffing. The Harvest and Habitat Modeling Project, scheduled for completion in spring 2005, will provide a foundation to establish sustainable harvest levels. Updated forest inventory information and field-reviewed projected outcomes will better inform the debate about state forests in the future.
Astoria/Forest Grove/ Tillamook	Why is ODF proposing to triple the logging level on state forest lands from the average of the past decade? Is this happening just from a "note" from the legislature? Isn't the Governor and the public entitled to input? Did all legislators go for this? What about the hurt put on fish bearing streams, the increased erosion, the damage to the tourist industry and the public use of hiking and other recreational uses?... Is this a way of making up for the failure of the tax increase measure?... Please reduce the logging levels to no more than 100 MBF a year.	The final 05 AOPs for Forest Grove, Tillamook and Astoria districts have lower output than the drafts. The reduction came as a result of clarifying legislative consultation and less-than-anticipated staffing. The Harvest and Habitat Modeling Project, scheduled for completion in spring 2005, will provide a foundation to establish sustainable harvest levels. Updated forest inventory information and field-reviewed projected outcomes will better inform the debate about state forests in the future.
Astoria/Forest Grove/ Tillamook	We are strongly opposed to your plans to increase logging in the Tillamook and Clasp Forests by 38%. Balance, not intensive logging should be the goal. OPS is unfairly biased towards logging. Please change this to make a balance and optimization among all uses.	The final 05 AOPs for Forest Grove, Tillamook and Astoria districts have lower output than the drafts. The reduction came as a result of clarifying legislative consultation and less-than-anticipated staffing. The Harvest and Habitat Modeling Project, scheduled for completion in spring 2005, will provide a foundation to establish sustainable harvest levels. Updated forest inventory information and field-reviewed projected outcomes will better inform the debate about state forests in the future.
Astoria/Forest Grove/ Tillamook	Please do NOT increase the level of logging in the state forests!... State forests need to have a balance of uses. Intensive logging in our public state forests is not a long-term solution to the economic challenges of our time... ODF must change the OPS Plans to find a true balance of uses.	The final 05 AOPs for Forest Grove, Tillamook and Astoria districts have lower output than the drafts. The reduction came as a result of clarifying legislative consultation and less-than-anticipated staffing. The Harvest and Habitat Modeling Project, scheduled for completion in spring 2005, will provide a foundation to establish sustainable harvest levels. Updated forest inventory information and field-reviewed projected outcomes will better inform the debate about state forests in the future.
Astoria/Forest Grove/ Tillamook	We urge ODF to increase 2004-05 harvest levels for the Department's three northwest Oregon districts (Tillamook, Forest Grove, Astoria) to 272 mmbf, rather than the proposed 32% increase over 2003-04 levels to 252 mmbf... Individual AOP years must make their proportionate contribution to the aggregate FMP harvest volume over the entire decade.	The final 05 AOPs for Forest Grove, Tillamook and Astoria districts have lower output than the drafts. The reduction came as a result of clarifying legislative consultation and less-than-anticipated staffing. The Harvest and Habitat Modeling Project, scheduled for completion in spring 2005, will provide a foundation to establish sustainable harvest levels. Updated forest inventory information and field-reviewed projected outcomes will better inform the debate about state forests in the future.

District Name	Comment Summary	District Response
Astoria/Forest Grove/ Tillamook	The Department should scale back the combined harvest levels to 221 MMBF total for the three Districts cited. This still represents a 15.7% increase compared to their 2004 AOP's. Although I personally believe 221 MMBF is still too high, this volume would be defensible with the legislature, while still retaining some measure of trust with the public.	The final 05 AOPs for Forest Grove, Tillamook and Astoria districts have lower output than the drafts. The reduction came as a result of clarifying legislative consultation and less-than-anticipated staffing. The Harvest and Habitat Modeling Project, scheduled for completion in spring 2005, will provide a foundation to establish sustainable harvest levels. Updated forest inventory information and field-reviewed projected outcomes will better inform the debate about state forests in the future.
Coos	"Clearcutting would make Oregon's drinking water dirty and polluted.."	Water Quality protection is mandated by both federal and state laws. The Oregon Forest Practices rules are approved as sufficient to implement water quality standards under the federal Clean Water Act. The Aquatic and Riparian Standards described in Appendix J of the Northwest Management Plan will be applied when posting the stream buffers in the 2005 sale plan. These standards will meet or exceed the Oregon Forest Practice Rules.
Forest Grove	Harvest increase too high. Find a better balance.	The final AOPs for Forest Grove, Tillamook, and, Astoria districts have lower output than the draft plans that were reviewed during the public comment period. The reduction came as a result of clarifying legislative consultation and less-than-expected resources. The Harvest and Habitat Modeling Project, scheduled for completion in spring 2005, will provide a foundation to establish sustainable harvest levels. Updated forest inventory information and field-reviewed projected outcomes will better inform the debate about state forests in the future.
Forest Grove	In the Forest Grove, Astoria, and Tillamook Districts, clearcut harvest levels are higher than specified in the IP's. ODF must explain in the AOP's how an increase in clearcut harvest will impact the timeline to reach the stand structure objectives of the IP's and FMP. ODF should minimize its emphasis on clearcuts and create balance in timber management that considers the needs of fish and wildlife.	The final AOPs for Forest Grove, Tillamook, and, Astoria districts have lower output than the draft plans that were reviewed during the public comment period. The reduction came as a result of clarifying legislative consultation and less-than-expected resources. The Harvest and Habitat Modeling Project, scheduled for completion in spring 2005, will provide a foundation to establish sustainable harvest levels. Updated forest inventory information and field-reviewed projected outcomes will better inform the debate about state forests in the future.
Forest Grove	AOL urges ODF to increase FY05 harvest levels beyond the proposed 32% to 272 mmbf for Forest Grove, Astoria, and Tillamook Districts.	The final AOPs for Forest Grove, Tillamook, and, Astoria districts have lower output than the draft plans that were reviewed during the public comment period. The reduction came as a result of clarifying legislative consultation and less-than-expected resources. The Harvest and Habitat Modeling Project, scheduled for completion in spring 2005, will provide a foundation to establish sustainable harvest levels. Updated forest inventory information and field-reviewed projected outcomes will better inform the debate about state forests in the future.
Forest Grove	The Department should scale back harvest levels to 221 mmbf.	The final AOPs for Forest Grove, Tillamook, and, Astoria districts have lower output than the draft plans that were reviewed during the public comment period. The reduction came as a result of clarifying legislative consultation and less-than-expected resources. The Harvest and Habitat Modeling Project, scheduled for completion in spring 2005, will provide a foundation to establish sustainable harvest levels. Updated forest inventory information and field-reviewed projected outcomes will better inform the debate about state forests in the future.

District Name	Comment Summary	District Response
Forest Grove	The AOP's should state that FY05 harvest levels are not sustainable.	The final AOPs for Forest Grove, Tillamook, and, Astoria districts have lower output than the draft plans that were reviewed during the public comment period. The reduction came as a result of clarifying legislative consultation and less-than-expected resources. The Harvest and Habitat Modeling Project, scheduled for completion in spring 2005, will provide a foundation to establish sustainable harvest levels. Updated forest inventory information and field-reviewed projected outcomes will better inform the debate about state forests in the future.
Forest Grove	Do not increase the level of logging on State Forests.	The final AOPs for Forest Grove, Tillamook, and, Astoria districts have lower output than the draft plans that were reviewed during the public comment period. The reduction came as a result of clarifying legislative consultation and less-than-expected resources. The Harvest and Habitat Modeling Project, scheduled for completion in spring 2005, will provide a foundation to establish sustainable harvest levels. Updated forest inventory information and field-reviewed projected outcomes will better inform the debate about state forests in the future.
Forest Grove	Opposed to 38% increase in harvest levels.	The final AOPs for Forest Grove, Tillamook, and, Astoria districts have lower output than the draft plans that were reviewed during the public comment period. The reduction came as a result of clarifying legislative consultation and less-than-expected resources. The Harvest and Habitat Modeling Project, scheduled for completion in spring 2005, will provide a foundation to establish sustainable harvest levels. Updated forest inventory information and field-reviewed projected outcomes will better inform the debate about state forests in the future.
Forest Grove	Scale back logging to earlier levels.	The final AOPs for Forest Grove, Tillamook, and, Astoria districts have lower output than the draft plans that were reviewed during the public comment period. The reduction came as a result of clarifying legislative consultation and less-than-expected resources. The Harvest and Habitat Modeling Project, scheduled for completion in spring 2005, will provide a foundation to establish sustainable harvest levels. Updated forest inventory information and field-reviewed projected outcomes will better inform the debate about state forests in the future.
Forest Grove	Opposed to increase in harvest levels. Reduce harvest levels to no more than 100 mmbf.	The final AOPs for Forest Grove, Tillamook, and, Astoria districts have lower output than the draft plans that were reviewed during the public comment period. The reduction came as a result of clarifying legislative consultation and less-than-expected resources. The Harvest and Habitat Modeling Project, scheduled for completion in spring 2005, will provide a foundation to establish sustainable harvest levels. Updated forest inventory information and field-reviewed projected outcomes will better inform the debate about state forests in the future.
Forest Grove	Do not increase the level of logging on State Forests.	The final 05 AOPs for Forest Grove, Tillamook and Astoria districts have lower output than the drafts. The reduction came as a result of clarifying legislative consultation and less-than-anticipated staffing. The Harvest and Habitat Modeling Project, scheduled for completion in spring 2005, will provide a foundation to establish sustainable harvest levels. Updated forest inventory information and field-reviewed projected outcomes will better inform the debate about state forests in the future.

District Name	Comment Summary	District Response
Forest Grove	Scale back logging to earlier levels.	The final 05 AOPs for Forest Grove, Tillamook and Astoria districts have lower output than the drafts. The reduction came as a result of clarifying legislative consultation and less-than-anticipated staffing. The Harvest and Habitat Modeling Project, scheduled for completion in spring 2005, will provide a foundation to establish sustainable harvest levels. Updated forest inventory information and field-reviewed projected outcomes will better inform the debate about state forests in the future.
6. Roads and Related Projects		
Astoria	Road Construction: Proposed total road construction of over 28 miles exceeds the upper limit in the IP by 5 miles or 22%. This \$3.3 million investment in roads is in stark contrast to \$59,300 proposed for Recreation (excluding grants), with zero trails actually being built! One road project alone, for the McKnob harvest, costs nearly \$700,000, or 33% of the gross value of that operation.	Astoria's final AOP will construct 18 miles of new roads as compared to 28 miles in the public comment draft AOP. The output for road construction needed to support the operations in the final AOP are within the ranges of the IP. Additionally, the approved Clatsop State Forest Recreation Plan was crafted by a citizen advisory committee and ODF. The implementation of this plan into activities accomplished in Annual Operation Plans is done in consensus approach with the Clatsop Recreation Advisory Committee. This years AOP reflects a significant increase in recreation resource inventory, short and long term planning, facility construction, facility improvement, development of new equestrian trails, and hiking trail layout from Bloom Lake to Henry Rierson Spruce Run Campground.
Astoria	McKnob - Sale to be modified to minimize new road construction: 10.5 miles of new road and 32.6% total cost is unacceptable.	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.
Astoria/Forest Grove/ Tillamook	Roads - In the Forest Grove, Astoria and Tillamook Districts road building in the OPS Plans are increased beyond the ten-year Implementation Plans. There is no discussion of how such road building will impact fish and wildlife. REQUESTED CHANGE IN THE OPS PLANS – ODF should keep road building within the originally planned range and should explain how any increase in road building will directly impact fish and wildlife.	The range of road building is an estimated output, not an objective or goal. Some years the road building acres will be high and some years they will be low. However, over the IP planning period, the average of road building, road improvement, and road vacating miles are expected to remain within their respective ranges. The outputs stated in the IP for different categories are tied to acres of operations with outputs generated. All road building will be done in accordance with all applicable rules and regulations (FPA, FMP, SAH, etc.)
Astoria/Forest Grove/ Tillamook	In the Forest Grove, Astoria, and Tillamook Districts, the amount of road building in the AOP's has been increased beyond the ranges specified in the IP's. ODF should keep road building within planned range of the IP's and explain how road building will impact fish and wildlife.	The range of road building is an estimated output, not an objective or goal. Some years the road building acres will be high and some years they will be low. However, over the IP planning period, the average of road building, road improvement, and road vacating miles are expected to remain within their respective ranges. The outputs stated in the IP for different categories are tied to acres of operations with outputs generated. All road building will be done in accordance with all applicable rules and regulations (FPA, FMP, SAH, etc.)

District Name	Comment Summary	District Response
Forest Grove	In the Forest Grove, Astoria, and Tillamook Districts, the amount of road building in the AOP's has been increased beyond the ranges specified in the IP's. ODF should keep road building within planned range of the IP's and explain how road building will impact fish and wildlife.	The range of road building in each district's IP is an estimated output, not an objective or goal. Some years the road building acres will be higher and some years they will be lower than the estimated range. However, over the IP planning period, the average of road building, road improvement, and road vacating miles are expected to remain within their respective ranges. All road building will be done in accordance with all applicable rules and regulations (FPA, FMP, SAH, etc.)
Southwest Oregon	The landing has been polluting the waters of the river below for years...	While there are perennial streams in the sale areas, all three sales areas are located on ridge tops away from major streams. Currently there is no road access to any of the sale areas or any landings within the sale areas. Therefore, this comment is neither relevant nor accurate for this sale.
Tillamook	Area I cannot be accessed by Coal Creek Road.	Comment is correct and the document contains an error. This will be corrected in the final version of the document.
Tillamook	Section V describes Area I as accessed by Coal Creek Road	Comment is correct and the document contains an error. This will be corrected in the final version of the document.
7. T&E Species Considerations		
Astoria	<p>Logging in Northern Spotted Owl Homes Range - The agreement between ODF and the US FWS on the Northern Spotted Owl required notification of any timber sales in all owl home ranges in the Tillamook and Clatsop State Forests. There are habitat suitability requirements that must be considered prior to allowing a logging operation in a home range. The OPS Plans state that a biological assessment was created for select timber sales in home ranges but it appears that the US FWS has not yet signed off on the style and structure of such sales.</p> <p>REQUESTED CHANGE IN OPS PLANS – ODF should not proceed with timber sales in a Northern Spotted Owl home range until the US FWS agree with ODF that such sales do not undermine the protection of these birds as required by the Northern Spotted Owl agreement.</p>	Astoria district proposed the Crawford Ridge timber sale in a stand consisting of even aged plantations, growing more dense, with increasingly less suitable habitat over time for NSO's. In accordance with the Agreement for the Conservation of Northern Spotted Owls between ODF and USFWS, the proposed sale areas were reviewed with 2 ODF biologists, 1ODFW biologist, 1USFWS biologist and Astoria District Staff. This group reached a consensus that the prescription proposed for these plantations would improve owl habitat in the area. Subsequently, a proposal to modify the Agreement for the Conservation of Northern Spotted Owls has been negotiated and is in processing for signatures. This modification will allow thinning in stands that may become greater than 40 years old during the harvesting activity.

District Name	Comment Summary	District Response
Astoria	<p>Logging in Northern Spotted Owl Historic Sites - Both the Cole Mountain timber sale and the Lotta Thin timber sale are planned in areas that once housed the Northern Spotted Owl. These historic sites are important because they could contain habitat for a future owl to return and nest. These areas are also an important focus of the draft Habitat Conservation Plan for the northern spotted owl. It appears, however, that ODF is focusing on active logging operations around these critical areas, which could render them useless for future owl populations without proper analysis of the type and function of logging activity. REQUESTED CHANGE IN THE OPS PLANS – ODF should only thin in these historic sites with a goal of creating more complex structure for future owl habitat and should take care in logging large swaths of habitat already proven to have housed the Northern Spotted Owl.</p>	<p>All ODF planned operations are in compliance with existing policies and regulations. The Cole Mountain Combination and Lotta Thin timber sales are not located within specified areas of focus in the current draft HCP strategies. The majority of these two sales are partial cuts (100% of Lotta Thin timber sale and 89% of Cole Mountain Combination timber sale).</p>
Astoria	<p>Questions/Concerns Regarding Specific Operations - HAMBONE: This operation will clearcut suitable NSO habitat within the 1.5 mile radius Tidewater owl circle. The ODFW Biologist has expressed his concerns. I do not understand the justification for proceeding with that portion of this Timber Sale, especially when mixed conifer-hardwood stands have been shown to be among the best NSO habitat available in the District. Overall, this operation will remove 2700 MMBF of hardwoods, the most of any planned sale.</p>	<p>Approximately 11 acres of the proposed Hambone timber sale lies within the outer portion of the 1.5-mile radius Tidewater northern spotted owl circle. The sale areas are located outside the 0.7-mile radius circle and do not impact any known spotted owl core use areas. A biological assessment has been conducted and it was determined that this sale is in compliance with the "Agreement for the Conservation of Northern Spotted Owls" between ODF and USFWS.</p>
Astoria	<p>Arcadia - Should be surveyed for MM's due to proximity of MM's in older stand north of the sale area.</p>	<p>The sale area was surveyed to protocol for MM's in 2001, 2002, and 2003, with the survey results listed in the Pre-Operations report.</p>
Astoria	<p>Arcadia - North side of sale area should be buffered so as to not disturb MM's north of sale area.</p>	<p>The proposed sale area, a thinning, will be at least 500 feet away from the closest suitable habitat for marbled murrelets.</p>
Astoria	<p>Cole Mountain - Sale areas closest to the "Historic Cole Mountain NSO Site" should be undisturbed.</p>	<p>All ODF planned operations are in compliance with existing policies and regulations. The Cole Mountain Combination and Lotta Thin timber sales are not located within specified areas of focus in the current draft HCP strategies. The majority of these two sales are partial cuts (100% of Lotta Thin timber sale and 89% of Cole Mountain Combination timber sale).</p>
Astoria	<p>Crawford Ridge - This entire sale should be cancelled so as to abide by the Strum Creek Agreement; an agreement is an agreement and ODF's attempt to modify the agreement are disingenuous.</p>	<p>Astoria district proposed the Crawford Ridge timber sale in a stand consisting of even aged plantations, growing more dense, with increasingly less suitable habitat over time for NSO's. In accordance with the Agreement for the Conservation of Northern Spotted Owls between ODF and USFWS, the proposed sale areas were reviewed with 2 ODF biologists, 1ODFW biologist, 1USFWS biologist and Astoria District Staff. This group reached a consensus that the prescription proposed for these plantations would improve owl habitat in the area. Subsequently, a proposal to modify the Agreement for the Conservation of Northern Spotted Owls has been negotiated and is in processing for signatures. This modification will allow thinning in stands that may become greater than 40 years old during the harvesting activity.</p>

District Name	Comment Summary	District Response
Astoria	Hambone - Area #3 should be cancelled to minimize disturbance to the NSO circle and the Tidewater Activity Center.	Approximately 11 acres of the proposed Hambone timber sale lies within the outer edge of the 1.5 mile radius Tidewater owl circle. The sale areas are located outside the 0.7 mile radius circle and do not impact any known spotted owl core use areas. The Biological Assessment has been conducted and it was determined that this sale is in compliance with the "Agreement for the Conservation of Northern Spotted Owls" between ODF and USFWS.
Astoria	Lost Fire - In the "Third Party Biological Assessment of the LVF/ODF Land Exchange Proposal" (11/5/02) by PWR it is stated that ODF was acquiring the Lost Lake area "...to manage this portion of the landscape as connectivity habitat for NSOs". We now, less than two years later, are told that ODF intends to conduct harvest operations on nearly 400 acres in this same area.	The majority of this sale will be a thinning, and thinned stands still function as NSO habitat for connectivity. Therefore, the connectivity habitat for NSO's will not be significantly impacted.
Astoria	Crawford Ridge Thinning logs with Spotted Owl presence and cause direct take from falling debris. Your thins are too often too thin, also taking the biggest trees. All trees over 11 inches diameter must not be cut. Trees in the circle must be no farther apart than 30 feet. There cannot be any clearcuts larger than 5 acres. There have been too many cumulative effects already of other adverse logging methods in the circle and area. It is very important to maintain migration corridors for up to 15 miles. The female was driven from the area completely with your harassment and flush pursuit.	Astoria district proposed the Crawford Ridge timber sale in a stand consisting of even aged plantations, growing more dense, with increasingly less suitable habitat over time for NSO's. In accordance with the Agreement for the Conservation of Northern Spotted Owls between ODF and USFWS, the proposed sale areas were reviewed with 2 ODF biologists, 1ODFW biologist, 1USFWS biologist and Astoria District Staff. This group reached a consensus that the prescription proposed for these plantations would improve owl habitat in the area. Subsequently, a proposal to modify the Agreement for the Conservation of Northern Spotted Owls has been negotiated and is in processing for signatures. This modification will allow thinning in stands that may become greater than 40 years old during the harvesting activity.
Cascade	Homestead Bridge Sale removes suitable habitat in a circle with too little now. Spraying of herbicide would also contribute to take..	The District is following the current ODF policy regarding Northern Spotted Owls. Reviews are conducted with ODFW and USFW. Approval for the Operations Plans will not occur until comments have been received from those agencies and review and recommendations have been made by the Program Director and the Area Director.
Coos	Lone Deer- "Do not log within a Marbled Murrelet Management area. That is a take. You do not have an incidental take permit for Marbled Murrelets. Logging their nesting area could cause them to abandon the nest site permanently."	This statement is incorrect, Lone deer does not fall within a Marbled Murrelet Management Area. Approximately one acre of the southern portion of Area II does fall within the quarter mile disturbance boundary and may require seasonal disturbance restrictions unless otherwise approved by area biologist.
Coos	Lone Deer - You have exceeded take permit limit for Spotted Owl. Do not remove suitable habitat from range. You are in violation of HCP agreement.	This statement is incorrect, the Elliott is in compliance with its HCP and ITP. The requirements in these documents specify that over time from 12-66% of each management basin will be maintained in Nesting Roosting Foraging (NRF) habitat for the spotted owl. No NRF will be harvested until the NRF habitat in the basin reaches the required level. That level of habitat will then be maintained over time. In the long-term, 39,781 acres (43% of the forest) will be maintained in NRF habitat. The required percentages are being adhered to for each management basin. The mature habitat that is currently being harvested, is located in management Basins that have current habitat in excess of the required target.

District Name	Comment Summary	District Response
Coos	Otter Creek - "This sale takes Marbled Murrelets by adversely modifying the MMMA. Don't log the MMMA." Adversely effects birds	The Elliott is in compliance with its marbled murrelet policy. This sale area was surveyed according to the Pacific Seabird Group standards and found not to be occupied with murrelets. This sale also, is not within 1/4 mile of a murrelet management area.
Coos	Curvey Puckett puts a clearcut adjacent to a MMMA adversely effects birds. This sale must be changed to a light thin.	Curvy Puckett is within 1/4 mile of a marbled murrelet management area. The Elliott is in compliance with its marbled murrelet policy which specifies a seasonal restriction on activities 1/4 mile from a marbled murrelet management area. Outside of the seasonal restricted time periods, activities may occur.
Coos	Western Sullivan clearcuts part of a MMMA, adversely effects birds.	This statement is incorrect, Western Sullivan does not fall within a Marbled Murrelet Management Area. A portion of the sale does fall within the quarter mile disturbance boundary and will require seasonal disturbance restrictions.
Coos	Middle Elk clearcuts MMMA buffer, adversely effects birds.	Areas 1, 2 and portions of Area 3 fall within the quarter mile disturbance boundary and will require seasonal disturbance restrictions. Under the terms of the Elliott FMP and murrelet policy, the 1/4 mile wide disturbance buffers can be clearcut.
Coos	Change Kelly Fish clearcut to a light thin. Clearcuts MMMA buffer, adversely effects birds	Portions of Kelly Fish are within the 1/4 mile buffer of a marbled murrelet management area. The Elliott is in compliance with its marbled murrelet policy which specifies a seasonal restriction on activities 1/4 mile from a marbled murrelet management area. Outside of the seasonal restricted time periods, activities such as clearcutting may occur.
Coos	Salander Top takes Marbled Murrelets and Spotted Owls both. Sale is in the Salander spotted Owl Circle.	The Salander Top timber sale is not within a marbled murrelet management area. It is within 1/4 mile of MMMA. The Elliott is in compliance with its marbled murrelet policy which specifies a seasonal restriction on activities 1/4 mile from a marbled murrelet management area. Outside of the seasonal restricted time periods, activities such as clearcutting may occur. The Elliott is in compliance with its Habitat Conservation Plan (HCP) and incidental take permit (ITP for the Northern spotted owl. The HCP requires mitigation and minimization measures that maintain and enhance essential habitat features for spotted owl. Habitat in the long rotation basins, as well as in Reserves provide an important basis for mitigation for the spotted owl. Because of these mitigation measures the ITP allows us to harvest mature timber as prescribed by our harvest schedule.
Coos	"Scientists found that the reserves for the Northern Spotted Owl were not put in the right place and important owl pairs were left unprotected. Those areas in Salamander Creek were logged anyway. This year a proposed 102 acre clearcut will include their home range. I urge you not to continue to cut in the Salamander Creek spotted owl habitat."	The Elliott is in compliance with its Habitat Conservation Plan (HCP) and incidental take permit (ITP) for the Northern spotted owl. The HCP requires mitigation and minimization measures that maintain and enhance essential habitat features for spotted owl. Habitat in the long rotation basins, as well as in Reserves provide an important basis for mitigation for the spotted owl. Because of these mitigation measures the ITP allows us to harvest mature timber as prescribed by our harvest schedule.

District Name	Comment Summary	District Response
Coos	"The evidence is especially alarming because the owl population on the Elliott plummeted from about 45 owls in 1993 to only 20 in 1998. Another owl survey revealed that last year not one pair of owls on the Elliott produced young. The ODF is violating their Conservation Plan by logging the best owl habitat first (which also hurts the Marbled Murrelets)."	ODF acknowledged a decline in owl population on the Elliott in the 5th year HCP review. This population decline is also being considered in the current planning process. This public comment will be forwarded to the Elliott Core Planning Team. In response to the comment that not one pair of owls produced young, this was true for much of the region. The Elliott is in compliance with its Habitat Conservation Plan (HCP) and incidental take permit (ITP) for the Northern spotted owl. The HCP requires mitigation and minimization measures that maintain and enhance essential habitat features for spotted owl. Habitat in the long rotation basins, as well as in Reserves provide an important basis for mitigation for the spotted owl. Because of these mitigation measures the ITP allows us to harvest mature timber as prescribed by our harvest schedule.
Coos	"The Elliott State Forest harbors endangered Coho salmon, yet has some of the most landslide-prone soils in Oregon. 11 out of the 12 sales proposed for 2005 have "high landslide hazard locations"."	All ODF timber sales are consistent with ODF's salmon protection policy, to insure compliance with the federal Endangered Species Act. Individual sale areas are also reviewed by the Area Geotech for recommendations which minimize harvest impacts.
Coos	"Disallow all current and planned timber sales that harm the Spotted Owl habitat."	The Elliott is in compliance with its Habitat Conservation Plan (HCP) and incidental take permit (ITP) for the Northern spotted owl. The HCP requires mitigation and minimization measures that maintain and enhance essential habitat features for spotted owl. Habitat in the long rotation basins, as well as in Reserves provide an important basis for mitigation for the spotted owl. Because of these mitigation measures the ITP allows us to harvest mature timber as prescribed by our harvest schedule.
Coos	"Stop cutting boundaries and road construction that gets closer than 300 feet of wildlife habitat, Machinery disrupts nesting patterns of endangered species like the Marbled Murrelet and the Spotted Owl."	The Elliott is in compliance with its marbled murrelet policy which specifies a seasonal restriction on activities 1/4 mile from a marbled murrelet management area. Outside of the seasonal restricted time periods, activities may occur.
Coos	"Logging operations too close to fish bearing streams has been observed as thwarting spawning activity as well."	"This statement is commentary on the operation and contains no recommendations."
Coos	"It is my understanding that ODF is about to approve the continued logging of some prime old growth forests in the Elliot State Forest. Please register my comments that I am completely against it. I have for years hunted all around that area and find that the logging companies have basically stripped most trees over 80 years old. We must leave some reserves for the protection of the spotted Owl, Murrelet and Coho salmon. I find it the ODF is even violating it's own conservation plan. Please prevent this wonderful area from being clear cut. Concentrate on thinning the reprod. that so badly needs your help."	The Elliott is in compliance with its Habitat Conservation Plan (HCP) and incidental take permit (ITP) for the Northern spotted owl. The HCP requires mitigation and minimization measures that maintain and enhance essential habitat features for spotted owl. Habitat in the long rotation basins, as well as in Reserves provide an important basis for mitigation for the spotted owl. Because of these mitigation measures the ITP allows us to harvest mature timber as prescribed by our harvest schedule.

District Name	Comment Summary	District Response
Coos	"Why chop down the home of animals like the salamander creek owl."	Habitat for the Salamander Creek Owl, as well as the other resident owls on the Elliotts are provided by the measures set forth in the HCP and ITP. The Elliott is in compliance with its HCP and ITP. The requirements in these documents specify that over time from 12-66% of each management basin will be maintained in Nesting Roosting Foraging (NRF) habitat for the spotted owl. No NRF will be harvested until the NRF habitat in the basin reaches the required level. That level of habitat will then be maintained over time. In the long-term, 39,781 acres (43% of the forest) will be maintained in NRF habitat. The required percentages are being adhered to for each management basin. The mature habitat that is currently being harvested, is located in management Basins that have current habitat in excess of the required target.
Coos	The Salamander Top sale is not consistent with the HCP, or its 5-year review recommendations, because portions "are located with the home range of the Salamander Creek Spotted owl pair.	The Elliott is in compliance with its Habitat Conservation Plan (HCP) and incidental take permit (ITP for the Northern spotted owl. The HCP requires mitigation and minimization measures that maintain and enhance essential habitat features for spotted owl. Habitat in the long rotation basins, as well as in reserves provide an important basis for mitigation for the spotted owl. Because of these mitigation measures the ITP enables us to harvest mature timber in accordance with the HCP. One of the primary concepts of the HCP is that ODF maintain and develop habitat over time, and does not address maintenance of specific owls. The HCP does not require NRF habitat outside existing reserves in Basin 15. The NSO study addressed in your comment is a separate study used by the Area and Salem staff biologists in reviewing the sale plans, and in developing strategies for a revised Forest Management Plan (FMP) and HCP. The Salamander Top sale was reviewed by the Southern Area wildlife biologist in the field and data reviewed in the office.
Coos	Last year we commented on the drastic decline of the Northern Spotted Owl (NSO) on the Elliott State Forest since the adoption of the Habitat Conservation Plan, as detailed by the NSO study completed in 2000 and the HCP 5-year review....But the response to our comments last year simply states that this rate of decline "was anticipated and taken into consideration in the development of the Elliott HCP." We couldn't find that assumption detailed in the HCP, the 2000 NSO study, or the HCP 5-year review. Could you please tell us what page numbers to look on?	This comment is in reference to the 2004 sale plan comments and responses. This information is on IV-12 and states that "Little or no population recovery is actually expected over 60 years on the Elliott, as relatively little net habitat recruitment is expected to occur during the next 40-50 years. Also, habitat conditions around some owl sites could continue to decline." Spotted owls have various cycles in nesting and breeding success. In accordance with the HCP, we continue to maintain the habitat levels required.
Coos	The 2003 owl study shows continued problems. There are only 11 pairs left on the Elliott, and not one of them nested last summer. The barred owl population is dramatically increasing. The ODF should be more concerned about Northern Spotted Owls and do everything possible to try to save this species locally. That should include strictly following the HCP requirements and its 5-year review recommendations. If the plan or recommendations are not followed, as it appears they are not, the AOP should have disclosed and explained the deviation. The ODF should also take into consideration the new information on barred owls, and take extra precautions against logging some of the best spotted owl habitat close to some of the best spotted owls on the forest.	Actually, the 2003 density study shows that the owl population in the Elliott is nearly identical to the population in 1996, which was the first full year under the HCP. In 2003, there were 12 active pair sites and a resident single for a total of 13 activity centers and 25 owls. In 1996 there were 13 activity centers and 23 owls. In response to the comment that not one pair of owls nested last summer, this was true for much of the region. Spotted owls have various cycles in nesting and breeding success. In accordance with the HCP, we continue to maintain the habitat levels required. In terms of the comments regarding barred owls, it is still unknown what longterm effects the barred owls will have on the Elliott spotted owls. The Elliott will continue to maintain the required habitat percentages according to the HCP.

District Name	Comment Summary	District Response
Coos	<p>Last year the 4200 Wedges Timber Sale clearcut directly within the heart of the Benson Creek Spotted Owl Site in the longest rotation watershed, even though recommendations from the 2000 NSO study was to not harvest in core areas. The 4200 Wedges Sale also clearcut the exact site that the Murphy Creek female spotted owl was observed in during the Spotted Owl Study. The 4200 Wedges Timber Sale clearcut one of the most protected places on the Elliott for Spotted. Owls, logging trees up to 50" DBH. We have previously asked for an explanation of how the Owl HCP allowed this. Explanations were given for how the Marbled Murrelet surveys were bypassed, but no explanations are available for how the Owl HCP was apparently violated. Even the revised FY 2003 AOP Summary that included the new 4200 Wedges sale said: "All planned regeneration harvest units are located in the 80-year rotation basins". Wrong. This sale was in a 240-year rotation basin, not 80-year. One ODF memo said the sale was needed to: "improve access to about 50 acres of ODF timber.</p> <p>Why would ODF want to improve access to "timber" in a 240-year rotation basin that they can't log? Last year we asked the ODF to please explain how this error happened but we didn't receive a response. Perhaps this year an explanation will be forthcoming.</p>	<p>This comment is beyond the scope of the 2005AOP as it refers to the 2004 AOP. This individual providing this comment received a response to this question in a letter in February 2003.</p>
Forest Grove	<p>Schmidlin sale is detrimental to NSO site.</p>	<p>Schmidlin was surveyed for spotted owls seven times in 2003. Approximately 26 acres of the Schmidlin sale area is within the 1.5-mile radius provincial home range circle for a spotted owl activity center classified as "resident single male". A Biological Assessment was completed by the Northwest Oregon Area Wildlife Biologist and subsequently reviewed by ODFW and USFWS. The BA and review comments concur that there is sufficient habitat within the circle to comply with the "Agreement for the Conservation of Northern Spotted owls" after the harvest of Schmidlin. A female spotted owl was visually observed once within the Schmidlin sale area and outside of the owl circle. The female was not detected during three additional surveys. The female was located approximately 1.7 miles away from the activity center described above and an association with that site could not be confirmed. Therefore, the female was classified as a "non-territorial single" and occupied site status was not established.</p>
Klamath-Lake	<p>You do not have an incidental take permit for Spotted Owls. You do not have permission of the landowner where they nest to harm the Sun River Spotted Owls by adversely affecting their habitat. We, the people, are the owners of public land in Crater Lake National Park and Sun River State Park. You must back off from our threatened wildlife habitat, not log suitable habitat trees and go log somewhere somewhere of less value to wildlife and the people of Oregon.</p>	<p>The US Fish and Wildlife Service reviewed the Biological Assessment and determined that the Four Corners Timber Sale is not likely to result in incidental take of spotted owls. No action or changes necessary.</p>

District Name	Comment Summary	District Response
Klamath-Lake	Four Corners would increase dryness and ambient air temperature, increasing flammable grass and brush growth in the Spotted Owl circle and corridor. It would increase fire danger and degrade micro-climate.	Density and ladder fuel reductions will decrease the sale area's susceptibility to catastrophic fire. The US Fish and Wildlife Service reviewed the Biological Assessment and determined that the Four Corners Timber Sale is not likely to result in incidental take of spotted owls. No changes necessary.
Klamath-Lake	Four Corners would increase predation on fledglings using the corridor.	The US Fish and Wildlife Service reviewed the Biological Assessment and determined that the Four Corners Timber Sale is not likely to result in incidental take of spotted owls. No changes necessary.
Klamath-Lake	Please do not remove trees larger than 11 inches diameter from the owl circle and corridor.	The US Fish and Wildlife Service reviewed the Biological Assessment and determined that the Four Corners Timber Sale is not likely to result in incidental take of spotted owls. No trees will be removed from the Sun Creek corridor. No changes necessary.
Klamath-Lake	It is obvious that the 4 of 7 pages including the suitable habitat chart missing indicate this sale is harmful to Spotted Owls. If you had nothing to hide all the pages and statistics would be on your web site.	A check of the web site showed that all 7 pages are there. No action or changes necessary.
Klamath-Lake	Tractor yarding is is very harmful to the ecosystems of Spotted Owls. Please use full suspension yarding even on level ground in Spotted Owl circles. Please leave the Owls alone, they have had enough harassment and pursuit already.	Full Suspension yarding would not be practical. In addition, the US Fish and Wildlife Service reviewed the Biological Assessment and determined that the Four Corners Timber Sale is not likely to result in incidental take of spotted owls. No action or changes necessary.
Klamath-Lake	Four Corners Timber Sale: Trees bigger than 11 inches must be left in the Spotted Owl circle. Destroying their future range is a take. If the larger trees are too far apart now that is all the more reason to stay out of that part of the circle except to enhance their habitat by removing small trees.	The US Fish and Wildlife Service reviewed the Biological Assessment and determined that the Four Corners Timber Sale is not likely to result in incidental take of spotted owls. No action or changes necessary.
Klamath-Lake	Four Corners Timber Sale: There obviously is a lot you are hiding. More than half of the Biological Opinion and the Suitable habitat chart are removed from your site.	A check of the web site showed that all 7 pages are there. No action or changes necessary

District Name	Comment Summary	District Response
Klamath-Lake	Four Corners Timber Sale: You must back off at least 500 feet farther from the migration corridor. Logging the edge will ruin the micro-climate and invite predators to prey on migrating fledglings. This is a shelter and breeding take.	The US Fish and Wildlife Service reviewed the Biological Assessment and determined that the Four Corners Timber Sale is not likely to result in incidental take of spotted owls. No action or changes necessary.
Klamath-Lake	Loggging expansion habitat is a future take, preventing the Spotted Owl from returning from the threat of extinction. The circle radius is too small now. It should be 1.5 miles at least, not 1.2.	The US Fish and Wildlife Service reviewed the Biological Assessment and determined that the Four Corners Timber Sale is not likely to result in incidental take of spotted owls. No action or changes necessary.
Southwest Oregon	Kerby Peak Timber Sale is pursuit and harassment of Spotted Owls, isolating 2 activity centers with adverse habitat modification.	This sale is designed to promote the continued development of complex habitat for Northern Spotted Owls. Due to the location of the sale in relation to the activity centers, the amount of acreage managed by ODF, and the proposed sale prescription, ODF and USFWS have determined that this sale is "not likely to result in incidental take of spotted owls." Upon completion of the sale, less than 10% of the area within 1.3 miles of the activity centers will have been modified and more than 75% of the currently suitable habitat will remain for nesting, foraging, and dispersing.
Southwest Oregon	Elken Oben - If much of their habitat was burned by fire. Why are you logging even more habitat?	The majority of Area 1 is currently unsuitable to Northern Spotted Owls due to the Timbered Rock Fire in 2002 and the Elk Creek Fire in 1987. However, current fuel loading as a result of the fire mortality in Area 1 places both the suitable and unsuitable portions at risk of catastrophic loss due to wildfire or insects if the density and arrangement of the stands are not altered. Both suitable and unsuitable areas will retain necessary habitat components to restore these areas to a healthy forest condition and dispersal habitat as quickly as possible.
Southwest Oregon	Stop taking Northern Spotted Owls.	This sale is within 1.3 miles of 2 Northern Spotted Owl activity centers; however, due to the location of the sale in relation to the activity centers, the amount of acreage managed by ODF, and the proposed sale prescription, ODF and USFWS have determined that this sale is "not likely to result in incidental take of spotted owls."
Southwest Oregon	Stay out of their circles unless you want to thin your reprod.	Even when thinning young stands within Northern Spotted Owl circles, care must be excercised to operate during periods when they are not nesting to avoid disturbing the breeding adults and fledging young. However, there are no current plans to thin the young stand in this area as it was precommercially thinned in 1997.
Southwest Oregon	Whirlybirding - Thinning would make this crowded cluster unsuitable.	There are no Northern Spotted Owl Clusters in the Southwest Oregon District. Currently, There are no Northern Spotted Owls within 1.3 miles of Areas 1 and 2. Area 3 is within 1.3 miles of 3 Northern Spotted Owl activity centers; however, due to the location of the sale in relation to the activity centers, the amount of acreage managed by ODF, and the proposed sale prescription, ODF and USFWS have determined that this sale is "not likely to result in incidental take of spotted owls."

District Name	Comment Summary	District Response
Southwest Oregon	Logging so close to nest sites is harassment.	Currently, There are no Northern Spotted Owls within 1.3 miles of Areas 1 and 2. Area 3 is within 1.3 miles of 3 Northern Spotted Owl activity centers; however, due to the location of the sale in relation to the activity centers, the amount of acreage managed by ODF, and the proposed sale prescription, ODF and USFWS have determined that this sale is "not likely to result in incidental take of spotted owls."
Southwest Oregon	You don't even know where all the nest sites are...	This sale has been surveyed according to current survey protocol for Northern Spotted Owls since 1999. In addition, Area 3 is within a BLM demographic study area designed to monitor the health and reproductive status and success of Northern Spotted Owls in this area. Therefore, due to the duration and intensity of survey activities in this area, the current information regarding the location of Northern Spotted Owls is considered sufficient for stand management decisions.
Southwest Oregon	You don't have an incidental take permit.	The US Fish and Wildlife Service reviewed the Biological Assessments and determined that the proposed SWO 2005 Annual Operations Plan in not likely to result in incidental take of northern spotted owls. No changes are necessary to proceed with approval and implementation of the SWO 2005 Annual Operations Plan.
Southwest Oregon	Young birds of the circles will not be able to intermix ...	Upon completion of the sale, less than 10% of the area within 1.3 miles of the activity centers will have been modified and more than 75% of the currently suitable habitat will remain for nesting, foraging, and dispersing.
Southwest Oregon	It adversely effects @20% of the suitable habitat.	Upon completion of the sale, less than 10% of the area within 1.3 miles of the activity centers will have been modified and more than 75% of the currently suitable habitat will remain for nesting, foraging, and dispersing.
Tillamook	ODF should remove the section of the Two Coals thin that overlaps with the TRI MA	A BA was completed and reviewed by ODFW the following is from the BA: The short term impacts of the proposed timber sale are not likely to adversely effect habitat suitability for marbled murrelets because these stands do not possess suitable nest site characteristics. The long term effects of the Two Coals timber sale are likely to improve habitat suitability for marble murrelets.

District Name	Comment Summary	District Response
Tillamook	The USFS, in their 1997 Recovery Plan, recommends unthinned buffers near occupied stands important in the western Tillamook Forest.	A BA was completed and reviewed by ODFW the following is from the BA: The short term impacts of the proposed timber sale are not likely to adversely effect habitat suitability for marbled murrelets because these stands do not possess suitable nest site characteristics. The long term effects of the Two Coals timber sale are likely to improve habitat suitability for marble murrelets.
Tillamook	Ask that you withdraw this area from the sale in order to protect Marbled Murrelets	A BA was completed and reviewed by ODFW the following is from the BA: The short term impacts of the proposed timber sale are not likely to adversely effect habitat suitability for marbled murrelets because these stands do not possess suitable nest site characteristics. The long term effects of the Two Coals timber sale are likely to improve habitat suitability for marble murrelets.
Tillamook	Ask that you withdraw this area from the sale in order to protect Northern Spotted Owl habitat	The sale is having second year surveys completed in 2004 for spotted owls. First year surveys had no owl detections.
Tillamook	East Foley Timber sale must be changed to a light thinning to discourage Great Horned Owls, Crows, and Raven predators and Barred Owl competitors.	This sale complies with Strum Creek Agreement Guidelines. Refer to the Biological Assessment for the sale area and the Risk Assessment section.
Western Lane	Almaise. Harasses spotted owls in a flush attempt	USFW reviewed the preliminary biological assessment in March 2004 and determined that the operation is not likely to result in the incidental take of spotted owls.
Western Lane	Almaise. Flushes marbled murrelets and ruins micro climate.	March 2204 USFW requested 2003 and 2004 survey results prior to making a determination. This will be done.
Western Lane	Alamise. Adversely modifies migration corridor between two owls circles.	USFW reviewed the preliminary biological assessment in March 2004 and determined that the operation is not likely to result in the incidental take of spotted owls.
Western Lane	Haynes Head. Please stop trying to take the North Neslon owls and their family.	USFW reviewed the preliminary biological assessment in March 2004 and determined that the operation is not likely to result in the incidental take of spotted owls.
8. T&E Fish Considerations		

District Name	Comment Summary	District Response
Astoria	<p>Questions/Concerns Regarding Specific Operations - OPERATIONS IN SALMON ANCHOR HABITAT AREAS: Planned operations will affect the Buster Creek, Rock Creek, Fishhawk Lake Creek, and Upper North Fork Nehalem basins. Within the individual pre-operation reports, there is the statement that:</p> <p>The sale areas will receive aquatic resource protection in accordance with the standards contained in the Northwest State Forest Management Plan, implementation plan and Salmon Anchor Habitat (SAHA) Strategies.</p> <p>A reference is given to the riparian management strategies in the FMP, but I believe there should also be a reference (or an attachment) to the SAHA strategies.</p>	<p>To improve clarity of the AOP, we will include a reference to SAH strategies, as applicable, in the pre-operations reports.</p>
Coos	<p>The ODF is not properly determining the fish-type of streams. ODF has incorrectly made the determination for fish presence during “summer low flow period”. For instance, various AOP reports say: “All drainages associated with the sale area were field surveyed during the 2003 summer low flow period to make final determination of stream type.”</p>	<p>Fish use determination is not completed during “summer low flow periods”. The statement quoted is in reference to the classification of streams as perennial or intermittent. If a stream has running water after July 15, then it is labeled a perennial stream. All drainages associated with the timber sales are surveyed to make the determination of perennial versus intermittent. The appropriate NW riparian strategy is then applied to the classified channel. Fish presence, on the other hand is determined using the protocol developed by Oregon Department of Fish and Wildlife and ODF in Surveying Forest Streams for Fish Use. This protocol prescribes fish surveying during the months of March and April.</p>
Coos	<p>The NW riparian strategy, used in the Elliott this year, does not give any management direction for seasonal type F streams. You must use the riparian strategy with the greatest protection. If fish use intermittent streams, they must be given the full riparian buffers required in the Elliott Forest Management Plan on page V-34:35 for “Fishbearing intermittent streams” (100 or 75 feet).</p>	<p>This portion of the AOP’s has been clarified. The minimum standards used for riparian buffers are those listed in the Elliott Forest Management Plan. We are applying the NW aquatic riparian strategy in addition to our management plan strategies. Because of this overlay of the two strategies, most buffers are in excess of our management plan, none would fall below the management plan specifications.</p>
Coos	<p>If fish use intermittent streams, they must be given the full riparian buffers required in the Elliott Forest Management Plan on page V-34:35 for “Fishbearing intermittent streams” (100 or 75 feet).</p>	<p>The NW riparian strategy affords the same protection for an intermittent fish bearing stream as it would for a perennial fish bearing stream. Fish bearing streams do receive at least the minimum buffer required in the Elliott’s FMP and HCP.</p>
Coos	<p>The AOPs do not adequately protect endangered coastal Coho salmon and other fish, like native cutthroat trout, in the Elliott State Forest. All the following units have a clearcut harvest prescription, even though the ODF has determined that clearcutting will double the chance of accelerating a landslide.</p>	<p>All ODF timber sales are consistent with ODF's salmon protection policy, to insure that the proposed sale is in compliance with the federal Endangered Species Act. Individual timber sales are also reviewed by the Southern Area Geotech.</p>

District Name	Comment Summary	District Response
Coos	<p>Clearcutting is good for endangered fish? Clearcutting has generally been found to negatively affect salmon because it contributes to peak flow increases in the winter, lower summer flows in the summer, and lethal sediment from in-unit and road-related landslides. However, the recent Elliott State Forest watershed analysis has some remarkable new information, that clearcutting is actually good for fish. It says: Research on Pacific Northwest streams indicates that clearcut harvesting increases summer flows rather than decreases flow... increases in summer flow due to tree removal can be viewed as a benefit to fish and aquatic amphibians. Unfortunately, the watershed analysis did not cite this remarkable research. Could you please send us a copy, or send us a link to it on the internet. Please use the address at the end of these comments. Were the conclusions based on large watershed basins or small ones?</p> <p>Were these conclusions based on years of data, or just one year after the clearcut? If there is just one year water increase, or if the increase is only useful if there are water reservoirs, the ODF should correct the watershed analysis with this information.</p>	<p>This comment is beyond the scope of the 2005 annual operations plan. However, research has shown that peak flows do increase for a period of time after tree removal. There are 12 pages of references in the Elliott's watershed assessment, some of which cite this research. A couple to look at: 1)Beschta, Pyles, Skaugset and Surfleet, 2000 and 2) Thomas and Megahan 1998.</p>
Tillamook	<p>ODF should withhold intensive logging operations in areas known to be important for fish populations</p>	<p>These sales are within the range of allowable acres designated in the Salmon Anchor Habitat strategies described in the current Implementation Plan.</p>
9. Other Wildlife Considerations		
Astoria	<p>Lotta Thin - Areas #1, 3 and 4 should be modified to partial cut/moderate (rather than "heavy") to allow minimal disruption in natural elk migration routes.</p>	<p>The planned operation has been reviewed by ODFW biologists. No recommendations were received indicating this operation would effect elk migration.</p>
Astoria/Forest Grove/ Tillamook	<p>If ODF continues to log at the highest range allowable then the wildlife values in the FMP will not be met.</p>	<p>The final 05 AOPs for Forest Grove, Tillamook and Astoria districts have lower output than the drafts. The reduction came as a result of clarifying legislative consultation and less-than-anticipated staffing. The Harvest and Habitat Modeling Project, scheduled for completion in spring 2005, will provide a foundation to establish sustainable harvest levels. Updated forest inventory information and field-reviewed projected outcomes will better inform the debate about state forests in the future.</p>
10. Slope Stability and Geotechnical Issues		

District Name	Comment Summary	District Response
Astoria	Crawford Ridge is too steep and is sliding into the creek everywhere they log destroying Coho habitat downstream from silt accumulation.	As stated in Section IX. Slope Stability and Geotechnical Issues, the initial hazard and risk assessment by the geotechnical specialists is rated as low. If high landslide-hazard locations are identified during fieldwork, the geotechnical specialist will be consulted.
Coos	"You state that: "Once the property lines are determined a small area of steep slopes on ESF managed land may need to be excluded from harvest above the eastern residence." Which is the eastern residence? You don't mention excluding the steep slopes above our building, although I have been told verbally that you will do so. It concerns me greatly that you are not giving us any more assurance about protecting our property. How much area are you excluding on the steep slopes above us? "	As mentioned in a previous response, the slope above the agricultural building is excluded from the sale as delineated on the exhibits.
Coos	"I strongly advise leaving a wider buffer strip along both County Roads, at least 100 feet and possibly more in the steepest areas for safety as well as scenic value. There have been several slides along Carlson Road, some very large ones after logging further east and repeated small ones between the Boylan residence and the corner almost yearly."	ODF's Southern Oregon Area geotech has checked this sale on the ground specifically for public safety issues. The sale boundaries have been located based on the geotech's input.
Coos	"These slides do produce debris flows which can affect Lake Creek since high water events carry large amounts of material into the creek. My examination of the area leads me to believe that there are not enough merchantable stems in the 100 foot buffer to justify the considerable risk of slides."	This area has been reviewed by the Area Geotech, reserve of hillside was not found to be warranted.
Coos	"Stop clear cutting of steep, unstable slopes. Clear cutting which denigrates watersheds creating heavy silt runoff not checked by forest vegetation. Twelve of the sales proposed for 2005 have high landslide hazard locations. Fish observably avoid silt-filled waterways. ODF findings to the contrary should be peer reviewed."	All ODF timber sales are consistent with ODF's salmon protection policy, to insure compliance with the federal Endangered Species Act.
Coos	"I appreciate your willingness to put a buffer between our building and the logging. I am requesting that you please put a large enough one so that we don't have to worry about flooding from below and slides from above. The November 1996 storm graphically demonstrated how clearcut hillsides can slide."	The location of the current buffer was located with assistance by the southern area geotech. This buffer starts at the slope break above the home. The slopes above this break do not meet the guidelines for steepness that would trigger a high risk assessment.
Coos	I would appreciate your assurance you will take every care in determining the geology of the land above Carlson Rd and particularly above our studio/shop and would also like your assurance that in the event of damage due to the logging you would rebuild this structure to our standards.	We followed Geotech guidance after a field review, and we are complying with both the Forest Practice Act and state standards.

District Name	Comment Summary	District Response
Coos	Another problem with this sale (Ash Valley School): "Indications of slope instability and spring flow were noted on the steep slopes immediately above Carlson road. There are three structures of concern along Carlson road, two are full-time residences and one appears to be a parttime recreational dwelling." The ODF must notify these people of the plans to clearcut above their homes. Even though "Harvest exclusion areas on the steep slopes above the two western structures will be delineated on the ground", the exclusion areas could not be adequate.	The location of the current buffer was located with assistance by the southern area geotech. This buffer starts at the slope break above the home. The slopes above this break do not meet the guidelines for steepness that would trigger a high risk assessment.
11. Recreation Resources		
Astoria	Please do not prioritize logging over all other uses in the forest... We need to find a better balance in the forest mgmt. methods starting with changing the OPS Plans for 2005.	The final 05 AOPs for Forest Grove, Tillamook and Astoria districts have lower output than the drafts. The reduction came as a result of clarifying legislative consultation and less-than-anticipated staffing. The Harvest and Habitat Modeling Project, scheduled for completion in spring 2005, will provide a foundation to establish sustainable harvest levels. Updated forest inventory information and field-reviewed projected outcomes will better inform the debate about state forests in the future.
Astoria	Concern about the lack of a quality recreation plan for Clatsop State Forest and the lack of progress in implementing recreational improvements. The Astoria District 2005 AOP allows for construction of more than 28 new miles of logging roads but builds ZERO miles of hiking trails. As a quality of life component for residents and a means to encourage productive tourism, recreational opportunities in our forest are essential. The Astoria District plan does not provide adequately for the balance of forest uses described in the "greatest permanent value" rule.	The approved Clatsop State Forest Recreation Plan was crafted by a citizen advisory committee and ODF. The implementation of this plan into activities accomplished in Annual Operation Plans is done in consensus approach with the Clatsop Recreation Advisory Committee. This years AOP reflects a significant increase in recreation resource inventory (OHV trails on Nicolai); short and long term planning (Astoria Basin and Lost Lake management plans); facility construction (Northrup Creek Horse Camp), facility improvement (Demonstration Interpretive Site and OHV trailheads); development of new equestrian trails (Northrup Creek); and hiking trail layout from Bloom Lake to Henry Rierson Spruce Run Campground.
Astoria	When is the district going to make a real investment in recreation as one of the values of our forests. Clatsop forest has 154,000 acres containing most of the older more complex forests available in the North Coast Range and many renowned fishing streams. The Clatsop forest is a natural for providing a variety of recreational opportunities for residents and visitors, but the District's emphasis on recreation in the '05 plan is simply inadequate.	This years AOP reflects a significant increase in recreation resource inventory (OHV trails on Nicolai and recreation user survey in the Astoria Basin); short and long term planning (Astoria Basin and Lost Lake management plans); facility construction (Northrup Creek Horse Camp), facility improvement (Demonstration Interpretive Site and OHV trailheads); development of new equestrian trails (Northrup Creek); and hiking trail layout from Bloom Lake to Henry Rierson Spruce Run Campground. With the finalization of available funds for recreation, the investment into the Astoria Recreation program is approximately 200% of the FY2004 AOP. This sizable increase is due to the availability of RV funds through this biennium.

District Name	Comment Summary	District Response
Astoria	Lost Fire - Area #3 should be removed from the sale to maintain the recreation experience along the trail.	The recreation Program is working closely with harvest planners and engineers to integrate resource values. A large scale Lost Lake Site Recreation Management Plan will be developed during this AOP period, with its aspects incorporated into the harvesting plans. In addition, planned road improvement activities are scheduled to improve recreation access and safety to the lake area.
Astoria/Forest Grove/Tillamook	Recreation staffing insufficient to handle workload. Reallocate resources.	The 2003 Oregon legislature allocated approximately \$4 million of 2003-2005 revenues to be used for the maintenance and development of recreation planning on State Forests over the course of the biennium. These resources represent a significant investment in recreation and are being used to implement the recreation plans for the various districts.
Astoria/Forest Grove/Tillamook	Recreation staffing insufficient to handle workload.	The 2003 Oregon legislature allocated approximately \$4 million of 2003-2005 revenues to be used for the maintenance and development of recreation planning on State Forests over the course of the biennium. These resources represent a significant investment in recreation and are being used to implement the recreation plans for the various districts.
Coos	The amount of recreation budgeted on the Elliott is pitiful. \$5,000 is all the Elliott will get, out of \$9.1 million in profits from this years logging income. There is not even one mile of hiking trail on the Elliott, in spite of some beautiful potential hiking areas. Why? Across from the Ash Valley School, a hiking trail should be built in the forest instead of clearcutting it.	91% of the Elliott is in the common school land ownership, the mandate for this ownership does not emphasize recreation use. According to a 1992 opinion of Oregon's Attorney General, the "greatest benefit for the people" standard requires the State Land Board to use the lands for schools and the production of income for the Common School Fund.
Coos	Across from the Ash Valley School, a hiking trail should be built in the forest instead of clearcutting it.	Clearcutting this stand while leaving the buffer strip and Green Tree Retention is consistent with our scenic production land classification for this area. The mandate for Common School Forest lands does not emphasize recreation.
Forest Grove	Recreation staffing insufficient to handle workload. Reallocate resources.	Existing recreation staffing levels will be supplemented by use of reallocated seasonal positions, temporary positions and contracts to accomplish FY05 objectives and workloads.
Forest Grove	Recreation staffing insufficient to handle workload.	Existing recreation staffing levels will be supplemented by use of reallocated seasonal positions, temporary positions and contracts to accomplish FY05 objectives and workloads.
Klamath-Lake	Although the draft plan indicates that Oregon Department of Forestry has no management activities scheduled for recreation, it is important to note the Department is managing for dispersed recreation use.	A statement about the district dispersed recreation strategy will be added to the AOP Summary document.
Tillamook	We notice that Arch Cape, Spider Jones, and Archer's Mark sale maps all fail to identify most of the OHV trail resources located within these operations.	When the maps were developed, the GIS OHV trail layer was not completed. That GIS mapping layer is now complete and will be added to future maps for AOP's. The Recreation Coordinator for the district has reviewed all of these sales and has identified all the trails in the sale areas and needed protection measures.
Tillamook	I'm concerned that if the recreation magement falls behind because of harvest level increases, the environmental community will use the resulting evidence to undermine the management plan itself and OHV use in the forest in particular.	Tillamook District remains committed to the recreation program. The increased harvest level will not take any resources or staffing away from recreation management on the district. Please refer to the Summary Document portion of the the AOP for a list of planned trail and facility projects for FY05.

District Name	Comment Summary	District Response
Tillamook	The increased harvest levels directed by the legislature will overrun recreation management goals unless Recreation staffing levels increase accordingly.	Tillamook District remains committed to the recreation program. The increased harvest level will not take any resources or staffing away from recreation management on the district. Please refer to the Summary Document portion of the the AOP for a list of planned trail and facility projects for FY05.
Tillamook	Please do not prioritize logging over all other uses in the forest	Tillamook District remains committed to the recreation program. The increased harvest level will not take any resources or staffing away from recreation management on the district. Please refer to the Summary Document portion of the the AOP for a list of planned trail and facility projects for FY05.
Tillamook	I have concerns that the increased harvest will lower OHV management involvement, which could incur less OHV input in the forests.	Tillamook District remains committed to the recreation program. The increased harvest level will not take any resources or staffing away from recreation management on the district. Please refer to the Summary Document portion of the the AOP for a list of planned trail and facility projects for FY05.
13. Scenic Resources		
Coos	"I believe a 50 foot buffer between the road and the sale is not large enough for a scenic barrier. At least 100' is necessary to block the view of the clearcut and leave a pleasing aspect along the road. The trees are not very dense in this area and a small buffer would just serve to accentuate the cut area behind."	Carlson road is not designated as a Scenic State Highway, and thus does not require any special buffering for that reason. This area is classified as Scenic Production land, timber production is the primary use, but may need harvest modifications to protect scenic values. We agree with this comment and will increase the buffer to 75' to reflect the goals of the scenic production land classification.
Coos	The scenic values of this forest (comment references Ash Valley School) should be more fully protected since it is in a "Scenic Management Area" just south of Loon Lake. The plan to leave a tiny beauty strip along the highway of only 50 feet isn't sufficient because the hillside and mountain top is clearly visible from the surrounding area.	Carlson road is not designated as a Scenic State Highway, and thus does not require any special buffering for that reason. This area is classified as Scenic Production land, timber production is the primary use, but harvest units may be modified to protect scenic values. We agree with this comment and will increase the buffer to 75' to reflect the goals of the scenic production land classification.
14. Access and Property Line Surveys		
Coos	"I am disappointed that you are closing the comment period before posting the corrected maps from your recent survey."	The survey was not completed prior to the comment period. The final survey location will be used to determine final sale boundary location.
15. Other Resource Considerations		
Coos	"It is my understanding that there are two rather than one unregistered domestic water supplies associated with structures along Carlson Road. Coming from Loon Lake Rd. (Douglas #3) the Boylan house on the south has a spring across the road on Elliott. On the north side of the road the second building is at present an unoccupied dwelling but it also has a spring-fed system which originates on Elliott. It may not be affected by your proposed area of operation but should be noted on your maps in any case."	This second water source, referred to in this comment, will be located on the Ash Valley School, Key Resources (Exhibit C) map.
Coos	Logging in Domestic water-use water watershed (Ash Valley School):	The location of the current buffer was located with assistance by the southern area geotech, and deemed to fully protect the water supplies of the Elliott neighbors.

District Name	Comment Summary	District Response
Coos	The AOP reports should have disclosed how logging next to residential neighborhoods (Comment refers to Ash Valley School) increases the fire danger to those homes. After the forest fires of 2002 in the Umpqua National Forest, the Forest Service concluded that young plantations are more of a fire hazard than older forests.	Fire danger in the coast range is considered fairly low most of the time. Elliott clearcut units do not typically have an excessive accumulation of slash. What slash is left decays rapidly in this climate. The National Forest examples that are referenced by the commentor are in areas of the state that experience higher fire danger. In the coast range, catastrophic fire generally is the result of unusually dry autumns after periods of drought, and stand damage can occur in mature stands as well as young stands. An example of this is the 1868 fire, burning most of the area now covered by the Elliott State Forest. One forest age type is not necessarily more of a fire hazard than another. It depends on weather, moisture conditions, and fuel loading.
Coos	Likewise, Special Forest Products is not mentioned in the AOP. When I was in the forest in March, I saw a large pick-up load of salal being driven off the forest by three Latino workers. The Elliott was required to develop a marketing plan for special forest products before 1994. Did you? Why aren't the revenues included in the AOP?	Information on special forest products has been added to the AOP.
17. Planting		
Astoria	Hill Road Alder - To minimize loss of hardwood, the sale area should be (a) thinned, not clearcut (b) planned for retention of the 'biggest and best' alder, and (c) under-planted with spruce and hemlock.	This sale has a desired future condition of General and has been targeted for regeneration (REG) to meet Implementation Plan goals for the North Fork Basin. Other areas within this basin are planned for more complex stand structures, goals, and objectives for the basin.
Southwest Oregon	Madrona and small pine and brush would ruin their feeding.	Naturally resprouting hardwoods following thinning will increase the vertical diversity of these stands. In addition, underplanting conifer species in hardwood patches will also increase the complexity of these areas. Therefore, both of these proposed management prescriptions are designed to increase the complexity and suitability of these stands for Northern Spotted Owl nesting, foraging, and dispersing.
18. Vegetation Management		
All	Please, do not spray; find another way.	The FMP recognizes herbicide application as an appropriate silvicultural tool to help ensure successful regeneration.
Astoria	Herbicide Application: A staff member has told me that herbicide application was being cut way back, presumably to encourage growth of hardwoods within stands. This is reflected in all Districts except Astoria. Of the total 2074 acres listed for vegetation management within the NW region, 1630 acres are for the Astoria District. This inconsistency needs to be explained.	Differences in the application of herbicides reflects the fact that different State Forest districts have different levels of competing vegetation, as well as different types of tree species planted post-harvest. The Forest Grove district generally has less competing vegetation than the other three districts, which contributes to less herbicide application. The Tillamook district plants more hemlock in areas harvested where Swiss Needlecast is present. Hemlock is more susceptible to damage from herbicide application, resulting in a reduced use of herbicides in and around areas where hemlock is present. The Astoria district has both higher levels of competing vegetation and less Swiss Needlecast, which contributes to a greater use of herbicides to ensure successful regeneration.

District Name	Comment Summary	District Response
Astoria	<p>Questions about vegetation management planned for the Astoria District. A "Summary of Draft Annual Operation Plans 2005" provided by ODF shows that in the Forest Grove District, 70 acres of vegetation management is planned; in Tillamook 350 acres, and in Clatsop 1630 acres! The Astoria District AOP states that the vegetation management goal is to complete 500 miles of roadside herbicide treatment, 394 acres of aerial herbicide application, and 392 acres of ground application of herbicides. Whichever set of numbers is correct, the amount of herbicide application planned for the Clatsop forest is many times that proposed for other districts and demands closer scrutiny. I have asked for an explanation of the dramatic differences in herbicide applications in the three districts but have not yet received a response.</p>	<p>Differences in the application of herbicides reflects the fact that different State Forest districts have different levels of competing vegetation, as well as different types of tree species planted post-harvest. The Forest Grove district generally has less competing vegetation than the other three districts, which contributes to less herbicide application. The Tillamook district plants more hemlock in areas harvested where Swiss Needlecast is present. Hemlock is more susceptible to damage from herbicide application, resulting in a reduced use of herbicides in and around areas where hemlock occurs. The Astoria district has both higher levels of competing vegetation and less Swiss Needlecast, which contributes to a greater use of herbicides to ensure successful regeneration.</p>
Coos	<p>"Ash Valley School timber sale logs the watershed for domestic drinking water supplies, leaving only a small buffer for the water tanks. After clearcutting, the ODF plans to aerial spray the entire area with herbicides."</p>	<p>Herbicide application will be in compliance with the Forest Practice Act and the herbicide label. Special care will be taken near sensitive areas.</p>
Coos	<p>"In your plan you mention spraying with herbicides after cutting and before replanting. I am very concerned about this. We have spent 20 years using no chemicals on our property so we could grow organic products without contamination. Anything you spray on the hillside above Carlson Road is going to run off onto our land. If you must use chemicals, please use ones that would be allowed for use on farms growing and selling products labeled organic and certified organic."</p>	<p>Herbicide application will be in compliance with the Forest Practice Act and the application label. Special care will be taken near sensitive areas. Direct application of herbicides will not occur within 60 feet of the sensitive area.</p>
Coos	<p>The abundant use of herbicides on the forest, year after year, is a cause for concern, especially with no monitoring of site specific effects, no monitoring of correct application technique, no monitoring of potential errors, no monitoring of cumulative effects, no monitoring of anything.</p>	<p>Herbicide application averages about 550 acres per year or about 0.6% of the forest land base. Herbicides are only used where it makes economic sense to help establish new fast-growing stands of trees. All herbicide applications are in accordance with Forest Practice Act and the label requirements. In reference to the monitoring comment, please refer to the Oregon Department of Forestry: Aerial Pesticide Application Monitoring Final Report: Technical Report 7, March 20. This study concluded that forest practice rules are effective at protecting water quality during aerial herbicide application.</p>
Coos	<p>ODF is no longer allowed to use 2,4-D or triclopyr or 54 other chemicals in the Elliott under a court-ordered review. The AOP should specify how ODF plans to comply with this ruling. What other chemicals, if any, will be used instead?</p>	<p>The only situations ODF uses 2,4-D or triclopyr on the Elliott is for specialized treatment of invasive weeds and roadside brush. The Elliott is complying with the court order by not using those chemicals in the buffered areas indicated in the ruling. The alternative treatments in the buffered areas will be mechanical control</p>

District Name	Comment Summary	District Response
Coos	The AOPs did not discuss how herbicides would be kept out of near by residential air and water, including addressing the problem of herbicide drift.	In reference to the comment concerning herbicide drift, herbicide application will be in compliance with the Forest Practice Act and the application label. Special care will be taken near sensitive areas. Direct application of herbicides will not occur within 300 feet of sensitive areas. Specific measures include; notifying residents in advance of planned applications and carefully monitoring wind conditions, suspending applications when wind conditions are not favorable. Humidity, temperature, and wind speed and direction will be monitored. Residents will be notified well in advance of planned applications. This information has been added to the AOP.
Coos	The ODF should be especially careful with the Ash Valley School timber sale, which clearcuts next to the Ash Valley School community building and within a “scenic production management area”. Herbicide spraying should not be done when the building is in use.	The Ash Valley School community building is a privately owned property, it no longer is owned or operated by the Reedsport School District. It will be given the same protection as any other residence in accordance with the label guidelines and the Forest Practice Act.
Coos	If ODF paid fair wages, clearcutting would not be so cost effective and more thinning could be done instead. But prison labor is used for replanting, paying workers only about \$2.00 a day for grueling and brutal work during cold and wet weather. The prisoners could also be forced to work with dangerous chemicals in the “hack and squirt” herbicide applications, as well as forced to work on clearcut units that have been aerial sprayed with pesticides.	Inmates are mandated by state law to work a minimum of forty hours a week. The actual cost of correctional crews is substantially more than \$2.00/day, requiring an infrastructure and support personnel, these costs add up to slightly less than contracting costs. There are social benefits to using inmates in that it helps develop a work ethic, self esteem, and skills they can use in a positive manner once they have paid their debt to society. Herbicide application will be in compliance with the Forest Practice Act and the application label. The department follows all OR- OSHA regulations for protection of workers.
Klamath-Lake	Would like some clarification on the noxious weed treatment- Is the entire 600 acres infested/being treated or is it spot treated within the 600 acres? What kind of monitoring is being conducted? Are the treatments being successful? Is the timing of treatment appropriate?	Additional detail will be added to the AOP Summary document to answer these questions.
Southwest Oregon	Do not use herbicide.	There are no plans to use herbicide in conjunction with this operation.
19. Animal Damage		
Klamath-Lake	What is the timing of the gopher control and is it appropriate.	Additional detail will be added to the AOP Summary document to answer these questions.
22. Other Issue		

District Name	Comment Summary	District Response
Astoria	Keep Reduction Factors Low During Harvest & Habitat Modeling - We urge ODF to "minimize, to the extent practicable," reduction factors for operability, availability, and logistical situations. AOL suggests that ODF's "Harvest & Habitat Modeling Project" should closely examine the availability and logistical factors - because under sound management practices utilized by ODF, these factors are unlikely to be as high as stated in the IPs.	The Harvest and Habitat Modeling Project, scheduled for completion in spring 2005, will provide a foundation to establish sustainable harvest levels. The ODF is making a significant effort during the development stage of the project to use appropriate constraints relative to operability, availability, and logistical situations.
Astoria	Forest Trust Land Advisory Committee (FTLAC) Charter - The Forest Trust Counties should continue having a significant voice in FMP implementation, during AOP consideration. The trust relationship of those counties rightfully extends greater standing. The AOP's must meet approval of the FTLAC, as well as statutory requirements of the County trusts and to the people of the State of Oregon.	ODF regularly provides information the the FTLAC and solicits feedback, and will continue to do so in the future.
Astoria	Questions/Concerns Regarding Specific Basins - NORTHROP : In Table 3, pg. 9, Northrup is listed as having zero regeneration acres under Cumulative Operations. That same Table in the 2004 AOP lists 321 clearcut acres cumulatively for Northrup. I assume there is a typographical error in the latest AOP.	There is a typographical error in Table 3, pg. 9. The Cumulative Operations - Regeneration total for the Northrup Basin should be 321 acres. This will be corrected in the final AOP.
Astoria	Military Green - The Special Stewardship in Area #4 (for future rock quarry expansion) should be removed as it is not compatible with the OFS DFC.	There is no LMCS (Special Stewardship) in Area 4 for rock quarry expansion. The Special Stewardship in Area 4 is for an existing rock stockpile site. This site will be used for many years into the foreseeable future and was inadvertently included with the DFC mapping of OFS for that area. The stockpile site is not included in Area 4 and the DFC mapping will be modified to reflect the intended long term use of the 2 acre site as General Stewardship.
Astoria/Forest Grove/ Tillamook	Increased harvest levels may lessen support for FMP.	The final 05 AOPs for Forest Grove, Tillamook and Astoria districts have lower output than the drafts. The reduction came as a result of clarifying legislative consultation and less-than-anticipated staffing. The Harvest and Habitat Modeling Project, scheduled for completion in spring 2005, will provide a foundation to establish sustainable harvest levels. Updated forest inventory information and field-reviewed projected outcomes will better inform the debate about state forests in the future.
Astoria/Forest Grove/ Tillamook	Increased harvest levels will undermine support for FMP.	The final 05 AOPs for Forest Grove, Tillamook and Astoria districts have lower output than the drafts. The reduction came as a result of clarifying legislative consultation and less-than-anticipated staffing. The Harvest and Habitat Modeling Project, scheduled for completion in spring 2005, will provide a foundation to establish sustainable harvest levels. Updated forest inventory information and field-reviewed projected outcomes will better inform the debate about state forests in the future.
Astoria/Forest Grove/ Tillamook	We at the Audubon Society of Portland ask ODF to reconsider the OPS Plans and instead pursue a more balanced approach.	The final 05 AOPs for Forest Grove, Tillamook and Astoria districts have lower output than the drafts. The reduction came as a result of clarifying legislative consultation and less-than-anticipated staffing. The Harvest and Habitat Modeling Project, scheduled for completion in spring 2005, will provide a foundation to establish sustainable harvest levels. Updated forest inventory information and field-reviewed projected outcomes will better inform the debate about state forests in the future.

District Name	Comment Summary	District Response
Coos	The "Timber Harvest Operations Financial Summary" table lists "Volume" as MMBF. However, the timber sale volumes appear to be listed as MBF. This should be corrected. I assume you don't really mean you will sell a total of 24,339 mmbf for the 2005 harvest plan.	This error has been corrected.
Coos	<p>Acres allowed to be clearcut in the matrix is inaccurate. The AOP summary states that the ODF is allowed to clearcut "510 acres per year" on the Elliott during the second decade of the HCP, referring to the table on page III-17 of the HCP, using the "Alternative A" line. This is an error. The table on page III-17 has no hard figures. Nowhere does it say "510 acres". In fact, the table shows that 500 acres is not reached for alternative A until about 2008. It also shows acres clearcut and thinned, not just clearcut. There is a another table on page IV-22 of the HCP that gives the acres of Owl Habitat (80+ years) allowed to be cut annually under the plan. This shows that in 2003 the acres are about 475, and in 2005 the acres are even less, continuing downward to 2033. Page IV-20 says: "An average of 470 acres of 80+ forests will be harvested per year in the first decade, with no more than 520 acres harvested in any one year. The total harvest of 80+ forest for six decades is 22,075 acres." This is an average of 368 acres of forests, over 80 years old, cut per year.</p> <p>If you cut 520 acres in one year, or 510 acres this year, you have to cut less in other years. Please correct this error in the AOP summary.</p>	The AOP summary is correct in describing the harvest values on page III-17 of the HCP, Figure III-2 shows acres per decade in thousands for each decade. There is no exact clearcut acreage given in either the FMP or the HCP except for decade 1. The clearcut acreage for decade 2 is derived from the detailed harvest schedule upon which the FMP and HCP are based. It can be seen on page III-17 by looking at the data point above year 2013, which is about the ending of decade 2, that clearcut harvest is about 500 acres. Similarly, the data point above the year 2003, the approximate end point of decade one, can be seen to be below 500 acres per year.
Coos	Table 2 in each Pre Operations Report is inconsistent. Some show net acres and some show gross acres (as defined in Table 1 of the same report). For instance, Western Sullivan, Elkhorn Ridge No. 6, Salander Top, Dry Stulls, and Brown Ridge Corners, Pre-Operations Report show gross, not net acres in table two, while the others show net acres.	These inconsistencies have been corrected.
Forest Grove	Increased harvest levels may lessen support for FMP.	The final AOPs for Forest Grove, Tillamook, and, Astoria districts have lower output than the draft plans that were reviewed during the public comment period. The reduction came as a result of clarifying legislative consultation and less-than-expected resources. The Harvest and Habitat Modeling Project, scheduled for completion in spring 2005, will provide a foundation to establish sustainable harvest levels. Updated forest inventory information and field-reviewed projected outcomes will better inform the debate about state forests in the future.

District Name	Comment Summary	District Response
Forest Grove	Increased harvest levels will undermine support for FMP.	The final AOPs for Forest Grove, Tillamook, and, Astoria districts have lower output than the draft plans that were reviewed during the public comment period. The reduction came as a result of clarifying legislative consultation and less-than-expected resources. The Harvest and Habitat Modeling Project, scheduled for completion in spring 2005, will provide a foundation to establish sustainable harvest levels. Updated forest inventory information and field-reviewed projected outcomes will better inform the debate about state forests in the future.
Klamath-Lake	The Partnership feels that Oregon Department of Forestry conducts a well-performed, high level of management on their forests and would like to encourage the Department to continue this	No action or changes necessary
Klamath-Lake	Determine if Oregon Department of Forestry has land within the boundaries of the Upper Williamson River Watershed Assessment being conducted by Klamath Basin Ecosystem Foundation and the Upper Klamath Watershed Council. If there are state forestlands within the boundaries, Oregon Department of Forestry should participate in the watershed assessment process.	The district will check this out and add this to the AOP Summary document if state forests are in the assessment area.
Southwest Oregon	In another 5 years you will say what you did at 4 Corners...	This sale is not located in the Southwest Oregon District, therefore, this comment is not relevant.
Tillamook	It seems to me the correct word is management and not ownership	The particular page referenced was not part of the AOP but rather a cover page for the presentation given at the Lower Nehalem Watershed. The term "ownership" is commonly used and refers to the legal ownership of the property by the State of Oregon.
Tillamook	The GEN acronym is not defined in the document	GEN is defined as General or stands not currently designated for Desired Future Condition of Layered or Older Forest Condition. The IP is expected to be revised in approximately 2 years. This sale area will be added to the Desired Future Condition Complex map and designation.
Astoria	Questions/Concerns Regarding Specific Operations: I am also very concerned about the loss of naturally regenerated hardwood stands (like Hambone cited above) before the Department has finished developing a clear policy on managing hardwood stands (not hardwood trees) as required by the FMP. [Note: This is the same message as in my previous two memos regarding the '03 and '04 AOP's. Since the AOP's do not identify the acreage of hardwood stands proposed to be cut, it is difficult to know how many acres are left. My sense is that by the time the Department completes the study, there may be few hardwood stands left to manage.]	The FMP states that up-to 10% of State Forests will be managed for hardwoods. The department is committed to adaptive management, and as more information becomes available in regards to hardwood management, ODF will re-assess it's hardwood management strategy as appropriate.