

Public Comment Summary

FY 2022 Annual Operations Plans for North Cascade District

The Oregon Department of Forestry (ODF) recently developed an Annual Operations Plan (AOP) for the ODF North Cascade District, which was heavily impacted by fire in 2020. In order to engage with Oregonians, ODF's Annual Operations Plan for the upcoming fiscal year had a 30-day public comment period, which began August 9, 2021. The public was notified via news release to media outlets in the Portland metro area and the Willamette Valley, as well as emails to citizens and stakeholders on ODF's mailing lists, the ODF website, and posts on ODF's Facebook and Twitter platforms. Public comment was accepted through the ODF website, email, or letter.

In all, ODF received three written comments directly related to the proposed plan during the comment period. During ODF's previous comment period for other districts' FY22 AOPs, the agency received four comments related to post-fire forest activities on the Santiam. These were set aside and considered as part of this approval process. The following is a summary of comments submitted by the public and responses.

Riparian Management Comments

- Question about which riparian buffers are being applied to the sales.
- Question about additional riparian management strategies applied within Aquatic Anchors.

Sales that are outside of the fire perimeter will apply the current Northwest Oregon Forest Management Plan (FMP) riparian management areas (RMA) strategies. Post-fire sales within the fire perimeter will apply the Draft Habitat Conservation Plan (HCP) Riparian Conservation Areas (RCA) strategies.

Additional riparian management strategies within Aquatic Anchors (AAs) are listed in ODF's Species of Concern Strategy and apply to modified clearcuts when they occur within the AA. Additional strategies include: Extending no-harvest zones out to 100 feet when regeneration harvesting on all fish streams, and large and medium non-fish streams; Extending no-harvest zones out to 50 feet when regeneration harvesting on small perennial, debris flow-prone, and high-energy non-fish streams. The planned harvest within the AA in this AOP is a partial cut, so the FMP riparian management strategies will apply.

Terrestrial Anchor Site Comments

- Is it correct that no post-fire operations are planned within a Terrestrial Anchor Site (TAS)?

No harvests are planned within the TAS in the FY22 North Cascade AOP.

Stand Condition Comments

- Question about pre-fire condition of the West 7 Mile and the Elk Foot post-fire sales.
- Concern that burned stands with a DFC Complex designation were logged with the FY21 AOP delaying their development into complex condition by decades. Recommended permanently classifying Elk Foot Units 3 and 5, and other units with scattered green trees, as Complex.

Pre-Fire Stand Condition: The pre-fire condition is stated in the individual Pre-Operation Reports for these sales in Table 3. The pre-fire stand condition for Elk Foot was closed single canopy and understory. The pre-fire condition for West Sevenmile was understory. Additional information can be found in the summary document in the Table A-2 Forest Resource Summary. This table shows that neither sale has a pre-fire condition of complex nor a desired future condition of complex.

Desired Future Condition (DFC) Complex: The overall long-term DFC Complex target for the Santiam State Forest is 35% and is designated in a functional arrangement across the landscape. This is a long term target estimated to take 70-90 years to achieve using a variety of management tools including active management. The mapped landscape design was established during the creation of the 2012 North Cascade Implementation Plan (IP) with input from ODF resource specialists and wildlife and fish biologists from the Oregon Department of Fish and Wildlife (ODFW). The landscape design has not changed as a result of the fires or subsequent post-fire harvest operations. Instead post-fire operations in DFC complex were designed using a variety of management tools including no harvest areas, retention of all green trees, increased retention of snags, and a variety of reforestation methods to move these areas towards the long term DFC goal.

Timber Harvest and Road Comments

Comments related to the state forests timber harvest and road programs include:

- Several commenters expressed a desire to see more post-fire harvesting take place.
- The plan continues to provide guidelines for designating leave-behind “green trees” in post-fire logging areas, raising some questions and concerns.
 - o An industry group stated that overly onerous green tree requirements were reducing available timber for sale, and leaves behind trees likely to die.
 - o A coalition of conservation groups requested more details on green tree criteria, protections, and the decision-making process.
 - o Safety concerns working around snags.
- Unsure which sales are post-fire harvests and which are green sales.
- Operational considerations: Sale volumes seem too high, suggest a larger diameter removal requirement in contracts. Unsure of need for so many sale areas. Consider combining small wood thinnings with modified clearcuts to make them more marketable.
- Concerned that in FY21 post-fire sales, the amount of timber actually available to be cut and sold was less than advertised volume.
- Encourage no new road building.

Response: The Annual Operations Plan seeks to balance the agency’s legal obligation to manage state forests for social, economic, and environmental values for the North Cascade District. The department is using several different management and reforestation approaches throughout the burn. These different approaches combined will create a diverse landscape that includes a variety of age classes, stand densities, and complex early seral habitat. These approaches will also recover value from burned areas, create jobs, fund vital public services and local schools, and provide for staff and public safety.

Harvest Levels: The FY22 AOPs were prepared to meet the harvest objectives approved in the 2021 North Cascade Implementation Plan. The initial estimate of harvest volume to be prepared and sold in FY22 is 8 MMBF. The harvest operations described in this plan provide approximately 6.5 MMBF in harvest volume. Another post-fire harvest operation will be released for public review and comment later in the fall that will bring the total up to 8 MMBF. This additional harvest is not being put forward now as ODF is still working through the planning and review with resource specialists, partner agencies and external stakeholders. An alternate timber sale is included in this plan which can be utilized if needed.

Green Trees and Snags: Green trees (**at least 15% live crown in respect to total tree height**) are considered reserve timber in post-fire harvest timber sale contracts. Reserved green trees and snags shall not be cut, or removed by the purchaser of the sale, unless otherwise approved in writing by the State. Substitute snags will be left for any green trees or reserved snags that are cut due to safety or operational concerns. These substitute snags will be left in areas that do not pose safety concerns for operators. Contract administrators are at the timber sale on a regular basis to ensure that the provisions in the timber sale contract are being followed.

Post-Fire versus Outside Fire Perimeter harvest: The Summary Table A-1 (pg. 30) has a “Type” column that indicates if the sale is “Post Fire” or “Outside Fire”(green sales) and summarizes the volume in these categories. Elk Foot and West Sevenmile are post-fire harvests. Good Aim Thin, Silver Dollar and Last West (ALT) are outside the fire perimeter (“green sales”).

Operational Considerations: Operational considerations such as a larger top diameter removal, combining units for operational feasibility, and field verification of resources will continue to be conducted during sale layout and contract preparation. There are often small changes that occur when preparing a timber sale after the initial planning stage. These changes happen when new information is available that can be verified in the field such as a modeled perennial stream is determined to be a seasonal stream, observed deterioration in the wood quality that affects the final contract cruise estimate and appraisal, etc. The final contract appraisal is completed and the minimum bid prices are determined during the layout and contract writing phase of timber sales.

In alignment with the IP, the majority of the post-fire harvests that have been planned have been less than 120 acres with many individual harvest units in the 30-60 acre range or smaller based on burn pattern, operational settings and green tree locations. Careful consideration was used when balancing the selection of harvest units in each sale, with the operational cost of including units with a significant number of green trees that would need to be left by policy. Areas with a large number of green trees, perennial streams requiring buffers, and reserve tree species that would help the department meet other aspects of GPV besides economics were not included within harvest areas.

Smaller units were utilized to ensure that leave trees remained within and well distributed across the harvest units in the uplands, away from roads, property lines, or stream buffers.

The district has combined small product silvicultural treatment units like the Good Aim Thin with larger wood regeneration harvests in the past and has received comments that the mixing of products was not ideal for sawmills that like a specific size product and involved more marketing from the purchaser side. The district utilizes different sale configurations in order to market sales that appeal to a wide variety of purchasers.

A few options were considered when developing the Silver Dollar sale. The boundary was not extended to the northeast to include the entire timber type in order to separate the area into two timber sales to be done in different years. An extension of this sale boundary to the northeast would in fact make this sale more desirable but would leave a smaller less desirable future sale to the east.

Road Construction: ODF evaluates each timber sale and strives to build the minimum number of roads required. There are 3 very short (each less than 150 ft) spur roads needed to facilitate cable logging on the Last West alternate timber sale.

DRAFT Habitat Conservation Plan Comments

- Continued strong disagreement between industry and conservation interests as to how, or if, elements of the draft Habitat Conservation Plan for western Oregon state forests should be incorporated before such a plan is approved by the Board of Forestry
 - o This included a request for clarity as to ODF's intentions regarding logging in proposed Habitat Conservation Area (HCAs) or Riparian Conservation Areas, and for ODF not to allow further logging in these proposed areas.
- Concern about "release" (manually or chemically) of conifers from hardwoods in proposed HCAs. Conifer-dominant management is relevant to lands in timber production, but not necessarily to those set aside for habitat conditions, for which a variety of hardwoods are extremely valuable but increasingly rare.

Management within Draft Habitat Conservation Areas (HCAs): The sales discussed in this plan have no planned modified clearcuts within the draft HCAs. The AOP does contain roadside hazard tree assessment and removal that will occur in some of these areas. Hazard trees will be assessed individually and the majority of trees in the roadside hazard mitigation areas may not meet the hazard tree/snag criteria. Hazard trees or snags that are felled along roadways that are also within a stream buffer shall be felled towards the stream if possible and not removed.

Reforestation and young stand management strategies for inside the HCAs are currently being drafted (including the role of hardwood) to be used when the Habitat Conservation Plan will be implemented. For the North Cascade FY22 AOP, 15 acres of manual release will occur this fall and another unit will be released in the spring that are located within Draft HCAs. These treatments are being done so that the minimum "free to grow" stocking requirement of the Oregon Forest Practices Act (OAR 629-610-0020) is met.

Various Comments

- Please release the Biological Assessment for the Evans Creek NSO circle that is within the Elk Foot hazard tree removal unit.
- Please prioritize finalizing the research proposals and ensure results are available to public

Roadside Hazard Mitigation within Northern Spotted Owl Circle: An ODF Biologist is currently developing the biological assessment for the Elk Foot roadside hazard mitigation needs. In alignment

with the IP, this assessment will be completed by the ODF biologist for the district and will be reviewed by the USFWS prior to the harvest being sold.

Monitoring: The monitoring projects that are listed in this AOP are the priority projects that are being developed and worked on. The reporting process is currently being developed and will contain a public reporting component.