

FISCAL YEAR 2026 ANNUAL OPERATIONS PLAN

Public Comment Summary

Public Involvement and Summary of Changes:

Fiscal year 2026 Annual Operations Plans for Astoria, Forest Grove, Klamath-Lake, North Cascade, Tillamook, West Oregon, and Western Lane Districts

In order to engage with Oregonians, the Oregon Department of Forestry (ODF) held a 45-day public comment period, which began April 18, 2025, for the upcoming fiscal year's Annual Operations Plans. The public was notified via a statewide news release and subsequent media coverage, as well as through emails to citizens and stakeholders on ODF's mailing lists, notification on the ODF website, and posts on ODF's Facebook, Instagram and X platforms. Public comment was accepted through the ODF website, email, or written correspondence.

In all, ODF received 516 letters related to the fiscal year 2026 Annual Operations Plans for the Astoria, Forest Grove, Klamath-Lake, North Cascade, Tillamook, West Oregon, and Western Lane districts. Each comment received was reviewed and the feedback considered through the lens of aligning with State Forests current plans and policies. Comments received that resulted in edits to specific timber sales are detailed in Appendix D of the district Summary Documents and detailed at the end of this document.

The following is a high-level summary of the comments received highlighting the major themes, topics, and the agency responses.

RECREATION COMMENTS

The agency received comments and recommendations regarding recreation. These included:

- Supports more public use opportunities.
- Build a motorized trail system in the Western Lane District.
- Open Browns Camp Campground year-round.
- Supports development and formalizing the Mountain Bike Trail System Plan for Larch Mountain. (multiple commenters)
- Support to construct of additional mountain bike trails.
- Recommends construction of additional mountain bike trails in the Larch Mountain area be added to the fiscal year 2026 Annual Operations Plan.
- Construct a climbing trail in the mountain bike area Larch Mountain.
- Recommends construction of additional mountain bike trails in fiscal year 2026.
- Utilize 100-foot buffers on trails to preserve trail setting during harvest activity.
- Construct additional trails to support the full spectrum of mountain bike rider abilities in the mountain bike area of Larch Mountain. (multiple commenters)

- Expand trails to include e-bikes.
- Include more detailed language in the fiscal year 2026 Annual Operations Plan pertaining to development of the mountain bike trail system in the Larch Mountain area and elevate to a priority project. (multiple commenters)
- Improve connectivity and diversity in the mountain bike trail system.
- Maintain access to equestrian trails and campsites. (multiple commenters)
- Develop new plans that allow for equestrian trails and campsites. (multiple commenters)
- Encourage the expansion of equestrian trails.
- Create paved trails for Americans with Disabilities Act accessibility.
- Support separating horses and bike use on trails. (multiple commenters)
- New plans should be developed to allow for horse trailer parking at equestrian trailheads.
- Requests more information and education regarding shared use trails. (multiple commenters)
- Conduct vegetation management on roads leading to recreation areas.
- Encourage approval of plan to construction entire mountain bike trail system. (multiple commenters)
- Recommends approving construction of trails identified in the current Westside Trail Federation Plan (Intended Future Condition Mountain Bike Area #1).
- Recommend allocating funds for professional trail building.
- Construct a climbing trail. (multiple commenters)
- Improving the quality of experience for dispersed recreation users like hunters.
- Recommends recreation trail protection.
- Protect recreation trails by avoiding adjacent clearcutting and roadbuilding. (multiple commenters)
- Opposes clearcutting near recreational sites and trails.
- Construct mountain bike trails with higher levels of difficulty.
- Encourage facilitation of volunteer mountain bike trail building efforts.
- Urges construction of more mountain bike trails in the Larch Mountain Area.
- Install a restroom in the Larch Mountain area.

RECREATION COMMENT RESPONSE:

Recreation Planning: Over the next few years, the Recreation, Education, and Interpretation program will be undertaking a large-scale planning process to align program plans and policies with the draft Habitat Conservation Plan. The program's focus will be to improve current facilities, trails, and operational procedures, while also addressing needs associated with emerging trends in recreational use and other recreational infrastructure surrounding State Forests managed land. Among the many factors to be considered are projected staffing and funding levels, recent usage patterns of different groups, and the ability to provide recreational access during other forest management activities.

Although the program's planning work will be done for all state forests, one area of significant planning need is the recreational infrastructure around Drift Creek Trailhead on the Tillamook State

Forest. Between fiscal year 2020 and fiscal year 2025, the Recreation Education and Interpretation program, in close coordination with community and volunteer partners, permitted and supported the development of three downhill mountain bike trails in the Larch Mountain area – north and east of Drift Creek Trailhead. With this milestone achieved, the program is focused on developing work plans to better support increased use to the area and guide long-term management.

To accomplish such objectives, the program will continue to work with long-standing, well-established partnerships that have been instrumental in the planning, construction, and maintenance of the existing trails. Specific to the planning, any future trail developments in the area will take into account skill-level and all-abilities accommodations, connections to existing infrastructure, and overall system maintenance agreements to allow for ODF staffing flexibilities. Additionally, future transportation planning done by the Forest Grove District will play a significant role in shaping ingress and egress to the area, as well as provide opportunities to explore road-to-trail conversions, particularly with respect to e-bike use and the development of climbing trail routes that connect the future trail system.

Equestrian Opportunities: The Recreation, Education, and Interpretation program manages four campgrounds specifically dedicated to equestrian use: Northrup Creek Horse Camp, Stagecoach Horse Camp, Reehers Camp, and Santiam Horse Camp. Each horse camp offers ample space for stock and equipment, including space for horse trailer parking.

Recent facility improvements such as new signage, site markers, and an enhanced online presence have been implemented to encourage visitation - with plans to add more messaging around multi-use trail etiquette in fiscal year 2027. Notably, all horse camps now offer advanced reservations, allowing riders to confidently travel to more remote locations with their stock, knowing a site will be available upon arrival.

Across the Northwest Oregon Area, over 40 miles of equestrian-permitted “loop” trails are accessible directly from these campgrounds: Northrup Creek Horse Camp (8.5 miles), Santiam Horse Camp (12 miles), Reehers Camp (12 miles), and Stagecoach Horse Camp (12 miles). Riders can typically extend their mileage by linking multiple trail systems or planning A-to-B rides for longer distances.

E-Bikes: The Recreation, Education, and Interpretation program is currently drafting internal e-bike rules in alignment with the recent rulemaking decision issued by the Oregon Parks and Recreation Department.

Forest Operation/Recreation Interactions: ODF uses practical strategies to minimize impacts on both the trail setting and visitor experience. Efforts are made to plan forest operation activities in ways that reduce the length of trail and facility closures. Additionally, when feasible, trail protection measures are included in timber sale contracts. These measures outline specific requirements for trail closure signage, infrastructure protection, and the restoration of impacted trails. Temporary trail closures may be necessary to ensure public safety in areas with active forest operations. When closures are required, ODF provides timely notifications through its website, trailhead kiosks, and signage at trail entrances to keep the public well informed.

Trail/Harvest Buffers: State forests are working forests, and it is inevitable there will be interactions with the growing recreation infrastructure and forest management activities. ODF recognizes that

timber harvests and road construction can, and often do, change the trail setting on the landscape and the use experience for trail enthusiasts. The agency works in an integrated manner across the recreation, young stand management, roads, and forest management teams to address these situations. For trail and public use safety mitigation measures, foresters work in conjunction with recreation staff as well as other specialists to achieve a mix of social, economic, and environmental benefits during sale layout, contract writing, and sale administration consistently. Trail buffers are implemented where economically feasible and compatible with other management objectives. Generally, it is common practice to extend no-harvest buffers around recreation trails that are near riparian conservation areas, green tree retention areas, and other environmentally sensitive areas.

TIMBER HARVEST COMMENTS

ODF received a number of comments regarding the state forest timber harvest program and impacts to varied resources as well as support for forest management. Comments included:

- Numerous comments oppose clearcuts. Several commenters wanted clearcuts stopped altogether and replaced with sustainable forestry practices, selective harvesting or harvests that mimic natural disturbance. (multiple commenters)
- Overall very supportive of the Annual Operations Plans and timber sales as a whole even though not agreeing with aspects of policy or operational decisions.
- Forests should be preserved to sustain rich biodiversity.
- Clearcutting destroys habitats and disrupts the cycle of ecology vital for maintaining wildlife.
- Opposes clearcutting and spraying.
- The fiscal year 2026 Annual Operations Plan calls for far too much clearcutting.
- Opposes clearcutting due to the impacts to climate change, carbon sequestration, wildlife habitat, biodiversity and scenic value in Oregon.
- Opposes clearcutting especially as ODF works to finalize a Habitat Conservation Plan.
- Proposed harvests in Astoria and Tillamook will undermine coastal economies that depend on the appeal of legacy forests and scenic viewsheds.
- Maturing public forestland must be protected from the harmful impacts of clearcutting and pesticide application.
- Recommends eliminating clearcuts and prioritizing the long-term survival and enjoyment of Oregon.
- The harm from clearcutting and use of chemicals outweighs the revenue received.
- Opposes harvests near the Nehalem River.
- Opposes clearcuts in Clatsop County.
- Opposes clearcutting and recommends looking to other countries as examples of true forest stewardship.
- Opposes clearcutting to allow the land and animals to recover.
- Proposed harvests in Astoria and Tillamook will accelerate habitat loss.
- Retain more live and dead trees within harvest areas to better mimic natural processes. (legacy structure)
- Opposes clearcuts next to water and eagle nests.

- Concern that clearcutting doesn't meet ODFs mission "To serve the people of Oregon by protecting, managing, and promoting stewardship of Oregon's forests to enhance environmental, economic, and community sustainability"
- Opposes clearcutting due to environmental impacts including loss of biodiversity, increased soil erosion, water cycle disruption, increased carbon emissions, altered ecosystems, impacts to flora and fauna, increased pollution affecting water quality and aquatic life, and impacts to local communities for resources, recreation, and cultural practices.
- Harvesting decisions need to reflect the need to protect the beauty of the area and the wildlife and the flora it sustains.
- Recommends integrating the key principles of Ecological Forest Management in the planning and implementation of forest operations. (Mix of silviculture tools/Greatest Permanent Value)
- Opposes clearcutting and supports keeping Oregon's forests pristine and natural.
- Recommends implementing a landscape-wide management approach that considers the connectivity of state forests with adjacent public and private lands to maintain a healthy, functioning ecosystem.
- Support protecting fish, wildlife, clean water, and recreation in Western Oregon state forests.
- Protection of fish, wildlife, clean water and recreation should be prioritized in Western Oregon state forests.
- Recommends that the wildlife habitat, water resources, recreation and stress relief values of forests be a higher priority than using forests as source for logs.
- Just because areas legally can be harvested doesn't mean it should be.
- Save our forests for recreation, wildlife habitat, clean rivers and wildfire protection.
- Preserve state forests to protect mature and old growth trees, maintain species, age and structure diversity, while making wood products available from industrial forests.
- Find other revenue sources including carbon credits, tourism, private land local timber processing requirements, recreation, sales tax, tourist tax, and lumber company tax. (multiple commenters)
- Suggests that there are higher priorities than revenue.
- Come up with solutions to revenue needs that benefit more than a handful of people.
- Suggests a different source of revenue is needed as forests should be managed for healthy ecosystems and sustainability.
- Find another way to fund county services rather than clearcutting.
- Active forest management creates jobs and wood for lumber mills.
- Recommends active forest management to create jobs and funding for communities and schools.
- Conservation-oriented forest management correlates with more jobs, higher incomes, and stronger tax bases in rural communities.
- Opposes all the harvests in the Astoria & Tillamook District Annual Operations Plans.

- Districts should manage the acres outside of Habitat Conservation Areas to meet the district's volume target and consider any volume from operations inside Habitat Conservation Areas as additional.
- Concerned about the plan to clearcut 6,000 acres of Western Oregon state forests as they risk harming fish, wildlife, water quality and fail to meet Oregon's climate goals for state forests.
- Harvest levels should be reduced to accommodate natural processes like wildfire.
- Concern that shorter rotation ages result in younger more homogenous forest across the landscape which increased wildfire risk.
- Opposes the 6,000 acres of clearcuts in the Annual Operations Plan.
- While some oppose clearcutting inside Habitat Conservation areas, others oppose all harvesting within these areas especially prior to having an approved Habitat Conservation Plan. (multiple commenters)
- Recommends additional harvests within Habitat Conservation Areas as the current levels are below what is allowed by the Habitat Conservation Plan.
- Recommends only partial harvesting within Habitat Conservation Areas to emphasize conservation and enhancement of habitat values. Consider only removing diseased trees that provide no habitat value to covered species.
- Road construction should be prohibited within Habitat Conservation Areas and Riparian Conservation Areas, especially until the Habitat Conservation Plan is fully implemented.
- Amend the draft Annual Operations Plans to remove clearcut harvest and road building within Habitat Conservation Areas and Aquatic Anchors.
- Prior to approval of timber sales in the Habitat Conservation Areas, ODF must demonstrate that the actions are “necessary and prudent to improve habitat quantity and quality”.
- Recommended that commercial thinning leave at least 70% canopy cover in stands with Marbled Murrelet nesting habitat.
- Once the Habitat Conservation Plan is approved, the management of the Habitat Conservation Areas should focus on the goals and objectives of the Habitat Conservation Plan.
- Retain all complex layered and older forest structure and mature forests, especially in the Clatsop State Forest as state forests in general are below the 30% threshold in the key performance measure. (multiple commenters)
- State forests have been overharvested for decades and as a result don't meet the 30% complex forest goal.
- Protect mature mixed and old-growth forests.
- Many oppose harvests of trees older than 80-years so that they may become future old growth. (multiple commenters)
- Retain coarse woody debris in harvest units to enhance habitat complexity and carbon storage.
- Prioritize protection of old trees versus revenue.
- Protect all mature and complex forests from harvest for the sake of fisheries, families and future livelihoods.
- Concerned with the use of imputed stand age rather than actual measured age of trees.

- Reconsider harvesting old growth as once they are cut, they are gone forever.
- Protect complex layered stands or only partial cutting if harvested.
- Opposes cutting of mature second growth or old growth trees in biodiverse regions or anywhere next to the Columbia River.
- Protect mature, complex forests that provide habitat for fish and wildlife and store carbon to fight climate change.
- Complex forests adjacent to threatened and endangered fish streams should be retained.
- Only selective thinning should be used to harvest legacy forests.
- Concern that plans to clearcut layered and older forest are inconsistent with agency plans including the Forest Management Plans, Key Performance Measures, and Climate Change and Carbon Plan.
- The past and current harvest levels, current condition of the state forests, and meeting performance measures, plan goals, and public demand, is cause for concern with planned clearcuts in layered habitat and stands over 80-years-old.
- Many oppose harvesting and road building next to private homeowners, schools, places of businesses and recreation areas. (multiple commenters)
- Recommends applying water quality impact mitigation, clearcut buffer zones, heritage tree programs and scenic protections to mitigate the effects from clearcutting on watershed quality, viewsheds and neighbors.
- Recommends re-evaluating harvest plans in close proximity to neighborhoods, farms, wetlands, springs, rivers and slide risks.
- Recommend that ODF sincerely listens to neighbors.
- Suggest dropping this word "neighbor" as the respect of the word has been broken.

TIMBER HARVEST RESPONSE:

Greatest Permanent Value/Policy Framework: The agency has a legal obligation to manage State Forests for social, economic and environmental outcomes, a concept commonly referred to as Greatest Permanent Value. State Forests provide outdoor recreation, education, and interpretation opportunities, essential fish and wildlife habitats, clean water, carbon storage, and sustainable harvest volume that produces jobs and revenue that funds vital services in rural counties, local districts, and schools throughout the state.

Greatest Permanent Value provides the foundation on which forest management plans are developed and provides the framework for how State Forests are managed. State Forest management plans identify the resource goals and strategies intended to achieve an appropriate blend of forest management and resource protections using the best available science. The Board of Forestry is responsible for reviewing and approving state forest management plans to ensure the plan will secure the Greatest Permanent Value for Oregonians.

State forest management plans set certain management strategies and standards that will be used to implement Greatest Permanent Value. These management strategies designate different management emphasis areas across State Forests. This includes designating areas primarily for developing and maintaining mature forests, aquatic and/or terrestrial habitats, carbon

sequestration and storage, etc., while other areas will be managed primarily with an economic focus while still providing resources such as clean water, biological legacies (old growth, leave trees, snags, downed wood), carbon sequestration and storage, and early seral wildlife habitat. Recreation opportunities will be managed across all of these areas providing different experiences depending on the management focus.

The management standards set by forest management plans are primarily associated with resource protection and in many instances have different management options that will achieve Forest Management Plan goals and Implementation Plan objectives. In these cases, operational policies guide decisions within this range of options by defining specific procedures and best management practices that allow for management flexibility, while ensuring sound management, resource protection, and compliance with required laws.

Implementation Plans describe the management approaches, harvest levels, and activities designed to achieve the Forest Management Plan goals and map the general locations where strategies will be implemented on the ground. Implementation Plans provide the linkages among the Forest Management Plan, draft Habitat Conservation Plan, Climate Change and Carbon Plan, operational policies, to the on-the-ground activities that are described in these Annual Operations Plans. Trade-offs for many of the topics for which public comments have been received were assessed and considered at the landscape level and are incorporated into the Implementation Plans. Implementation of these plans and policies will require the use of a variety of management tools such as clearcuts, thinnings, and passive management depending on the objectives of each area. This results in a variety of forest stand conditions across the landscape that maintain healthy, multi-species, vigorously growing forests, which will contribute to resilient healthy forests into the future. The sales in the Fiscal Year 2026 Annual Operations Plans have been developed and reviewed by field staff, technical specialists, and leadership to meet all requirements in the plans and policies above and are required to meet the balance of Greatest Permanent Value.

Revenue and Jobs: Active forest management provides revenue for counties, social services, and education. It builds communities by supporting living-wage jobs and contributing to local, regional, and state economies. By law counties share in all revenues from state forest Board of Forestry (BOF) lands (ORS 530.110, ORS 530.010, ORS 530.040); with 63.75% of revenues being distributed to local counties and taxing districts. This revenue is used to pay for local community services such as education, law enforcement, roads infrastructure, and community health. Revenue from state forest lands is a significant contributor to local budgets, which support social benefits. The remaining 36.25% of revenue from state forest lands pay for the management of state forest lands. This management includes items such as reforestation, young stand management, threatened and endangered species surveys, fish and wildlife habitat improvements, fire protection, and recreation, education, and interpretation programs, state forests staff, and infrastructure. The revenue generated from timber harvests on Common School Fund Lands contributes to the Common School Fund, which provides funding and resources to schools in Oregon. Alternate funding sources continues to be a widely discussed topic as new plans and policies are being developed but are out of scope at the Annual Operations Plan level.

Harvest Levels: Harvest levels were determined through the 2023 district harvest modeling analysis by modeling the requirements in the Forest Management Plans, draft Habitat Conservation Plan,

operational policies, and current conditions. This modeling estimated both harvest types and stand growth for multiple decades beyond the Implementation Plan term and was based on an even-flow goal, meaning harvest levels had to remain constant year to year. These harvest levels were reviewed for implementation by the districts before approval.

The majority of the harvested volume will come from clearcuts on lands outside of designated Habitat Conservation Areas, designated Desired Future Condition complex areas, Riparian Conservation Areas, no harvest wildlife areas, forested areas that are inoperable, scattered remnant old growth trees, recreation and scenic areas, etc. These lands are primarily managed for economic benefits but will contribute to other resource values such as snags, down wood, early seral forests, etc. Some volume will result from habitat restoration or improvement projects within draft Habitat Conservation Areas that are designed to meet the draft Habitat Conservation Plan objectives. Rotation ages of harvests are not set at a specific age, but rather are a product of stand condition, stand health, plan goals, and annual harvest objectives.

Volume targets are discussed in each districts' Annual Operations Plan summary document. However, some events may result in an Annual Operations Plan volume that is outside the planned Annual Harvest Objective range. These events may consist of, but are not limited to, storm damage, insect and/or disease outbreaks, prepared timber cruise results versus Annual Operations Plan volume estimates, timber market conditions or other significant events. Additional timber sales or timber sales included in the Annual Operations Plan may be sold as primary operations in response to any of these circumstances. Any adjustments made to harvest objectives will be captured in future Implementation Plan modeling efforts recalibrating the sustainable harvest levels as a part of adaptive management.

Harvesting within Habitat Conservation Areas: The draft Habitat Conservation Plan designates Habitat Conservation Areas, designed to provide habitat for covered terrestrial species. Habitat Conservation Areas make up approximately 43 percent of the total acres across 6 districts. This large conservation commitment was designed to mitigate potential disturbance and to allow for active management inside the habitat conservation areas to develop or improve habitat. Riparian Conservation Areas are designated for aquatic species, where harvest is not allowed. As described above, the areas outside of the Habitat Conservation Areas and Riparian Conservation Areas will primarily be managed for revenue and volume to meet other aspects of Greatest Permanent Value. Conservation Actions required under the Habitat Conservation Plan for areas outside of Habitat and Riparian Conservation Areas are intended to minimize impacts to covered species from timber harvest and other covered forest management activities. Habitat values provided for covered species outside the conservation areas will oscillate over time and space, supporting landscape level changes during implementation of the Habitat Conservation Plan.

Inside the draft Habitat Conservation Areas the overarching management objective is to increase the quality and quantity of habitat for terrestrial covered species through both passive and active management. Therefore, the only management actions that will occur in draft Habitat Conservation Areas are those that will contribute toward achieving that objective. There are many pathways for achieving habitat conditions over the long-term including both active and passive management. In portions of the draft Habitat Conservation Areas stand management activities will be implemented in order to improve habitat over the long term for covered species. Typically, this

will include a variety of density management prescriptions in healthy conifer forests to ensure that late-seral structure develops more quickly. In some cases, such as stands that are dominated by hardwoods or infected with Swiss needle cast, it will be more efficient to conduct regeneration harvests with higher levels of leave trees and snags and replant a species mix that will develop into covered species habitat in a shorter time frame

The draft Habitat Conservation Plan allows for an average of 1,500 acres of partial harvest and 1,000 acres of habitat restoration regeneration harvests within Habitat Conservation Areas per year. As the intention for management activities in these areas is to improve covered species' habitat, stands that are already high-quality habitat will require little to no management. Stands that provide lower quality habitat or no habitat will be managed in order to increase the quality and quantity of habitat over time. Prior to receiving Incidental Take Permits, these areas will be evaluated by agency biologists for threatened and endangered species survey requirements and habitat suitability to develop potential candidates for inclusion in an Annual Operations Plan. Appropriate management prescriptions will be developed to ensure compliance with the commitments set forth in the draft Habitat Conservation Plan. ODF's intent at the beginning of implementing these strategies is to ensure that the proper types of stands are being chosen to work in and appropriate prescriptions are applied for each stand while also considering survey costs for implementation prior to obtaining Incidental Take Permits. As more of this work is completed and once the Habitat Conservation Plan is approved, the pace and scale of the activities within the Habitat Conservation Areas will increase.

Complex/Mature Forest Management: As described in the Implementation Plans, ODF does harvest complex older mature stands that are not included in the mapped landscape design for desired future condition complex stands or within Habitat Conservation Areas. This decision was made in order to balance continued implementation of the current Forest Management Plans and honor the process of developing and implementing the draft Habitat Conservation Plan, while still meeting the harvest objectives within the Implementations Plans.

The Implementation Plans identify the targets for areas designated for complex structures that will be developed over the long term. The timeline to meet these targets is also outlined in each district's Implementation Plan. Areas designated as desired future condition complex and/or areas that have been designated as Habitat Conservation Areas have been identified as the highest priority locations where older trees and complex stands will be grown over time. Harvest of mature stands outside of these prioritized areas ensures that other aspects of Greatest Permanent Value and Implementation Plan objectives are being met while allowing younger stands to grow older in a sustainable manner.

In Oregon, one way agency performance is measured is through legislative key performance measures. Key Performance Measure #10 has a target to reach 30% complex structure over time on the Astoria, Forest Grove and Tillamook districts. This key performance measure is utilized to show the trends of ODF's policy implementation over time to help inform decision making. The timeline to meet this target is outlined in each District's Implementation Plan and reflects the areas that are designated through the current plans and policies where these stand structures will be achieved over time. The 2024 Annual Performance Progress Report shows that implementing current policies, levels of complex stands have an upward trend and are increasing across the

landscape over the last four years (increasing complex structure from 10.17% to 11.38%, using Stand Level Inventory for the combined Astoria, Tillamook, and Forest Grove Districts).

Adjacent Landowners: State forests are working forests, and it is inevitable that forest management activities will occur next to adjacent landowners. The Department of Forestry recognizes harvesting timber alters the physical environment, which may be viewed as a negative impact to neighbors. Changes have been made to improve the notification process to landowners that are adjacent to an operation, and it is planned that refinements will be made to that process as needed. District staff will engage with adjacent landowners during sale layout to identify potential concerns and work through solutions to address specific concerns, such as leave tree selection, property lines, operational/noise timing restrictions, reforestation plans, etc. where safety and operational considerations allow.

CLIMATE CHANGE AND FIRE MITIGATION COMMENTS

Climate change and the appropriate role of state forests continues to be a topic of concern. Comments and recommendations received in this theme included:

- Recommends less harvesting to mitigate climate change and forest fires and grow larger trees.
- Suggests proposed harvests in Astoria and Tillamook will accelerate the climate change crisis.
- Need to restore forests to control climate change.
- Follow the Climate Change and Carbon Plan and utilize climate smart forestry practices eliminating clearcuts to optimize carbon sequestration and storage and to minimize greenhouse gas emissions. These actions will achieve greatest permanent value. (multiple commenters)
- Implement climate smart forestry and consider climate impacts in all forest decisions.
- Management should only remove individual diseased trees and retain healthy trees to help slow global warming.
- Follow the climate plan, creating a robust conservation plan of legacy forests.
- Retain mature second growth trees to mitigate climate change.
- Requests that the Annual Operations Plan be modified so that it is aligned with the Climate Change and Carbon Plan. (multiple commenters)
- Recommends that the Annual Operations Plan be modified as the climate related economic costs from clearcuts exceeds log values.
- Urges more climate friendly harvest options rather than clearcutting.
- Recommends no harvesting to mitigate climate change and protect water.
- Suggests that the Annual Operations Plan is not in alignment with the commitments of the Climate Change and Carbon Plan.
- Increase harvest rotation age to increase carbon storage.
- Follow the Climate Change and Carbon plan and establish measurable climate and carbon outcomes.

- Implement longer rotations and greater retention of live and dead trees during harvesting to mitigate climate change.
- The Annual Operations Plan should be modified so that it is based on the best available science around climate change.
- Recommends setting aside areas to become old growth to benefit climate change.
- Concerned with the coastal drinking water crisis and climate change crises and recommend reducing harvest to mitigate climate related deaths and protect forest health.
- Active forest management is needed for fire mitigation. (multiple commenters)
- Active forest management including removing underbrush is needed for fire mitigation.
- Urges ODF to address increased fire danger due to public use.
- Extend harvest rotations where feasible to allow forests to mature and develop resilient structures that reduce susceptibility to catastrophic wildfire.
- Opposes forest management practices that heighten the potential for wildfire above what it was 15-30 years ago.
- Recommends that species conservation should not result in higher wildfire risk.

CLIMATE CHANGE AND FIRE MITIGATION RESPONSE:

State Forests are managed for Greatest Permanent Value which includes providing for a diverse, healthy, productive, and sustainable forest ecosystem over time that will reduce forest health issues, mitigate fire risk, and be more resilient to climate change. Greatest Permanent Value requires integrated resource management in order to continue to produce benefits under conditions driven by climate change. These forests will be actively managed to achieve objectives within stands and across the landscape to create a variety of forest conditions designed to meet Greatest Permanent Value while also improving the capacity for adapting to climate change and mitigating fire risk.

As outlined in Implementation Plans and described in the Annual Operations Plan summary documents, the goals and supporting actions of the Climate Change and Carbon Plan will be implemented in multiple ways including: landscape-level habitat protections which include large conservation areas (Habitat Conservation Areas, Riparian Conservation Areas), no harvest wildlife areas, sensitive areas, forested areas that are inoperable, existing old growth trees that are scattered or in small isolated patches, and legacy structures (i.e., old growth, green trees, snags, down wood) within harvest units that store carbon in standing trees; carbon stored in harvested wood products; silvicultural systems and prescriptions such as planting multiple tree species, utilizing varied planting spacings and densities; and addressing forest health issues such as insects and disease to provide for a diverse, healthy, sustainable and resilient forest ecosystem over time.

While many of the goals and practices outlined in the Climate Change and Carbon Plan are currently being implemented, some higher level topics like harvest age outside of Habitat Conservation Areas and carbon pricing/carbon credits are still being considered by the Board of Forestry. Board of Forestry direction will be incorporated into the draft Western Oregon Forest Management Plan and associated Implementation Plans. This process is currently underway but in

the short-term has left a transition period until those plans are finalized and adopted. During this transition period the majority of the goals and supporting actions identified for State Forests in the ODF Climate Change and Carbon Plan are met through implementing the current Forest Management Plans and incorporating the draft Habitat Conservation Plan. Modeling presented to the Board of Forestry in June 2025 estimated increasing forest carbon storage under a variety of scenarios, including harvest levels greater than those being implemented currently.

YOUNG STAND MANAGEMENT:

- Recommends more species diversity during reforestation.
- Replant after harvest for a continuous supply of lumber.
- Use herbicides sparingly and allow diverse native vegetation to flourish after logging and tolerate natural rates of conifer dominance.
- Concerned that older forests are vanishing due to accelerated clearcutting and being replaced by dense single species forests
- Recommends generally avoiding intensive vegetation management inside the Habitat Conservation Areas, except where minimum stocking standards may not be met.
- Intensive vegetation management should be used inside Habitat Conservation Areas for invasive species to better promote native forage vegetation.
- Reforestation stocking standards inside Habitat Conservation Areas should be reduced to levels that promote open areas for prolonged understory vegetation, specifically for big game browse.
- Eliminate big game animal damage control measures inside Habitat Conservation Areas with the exception of situations where there are concerns for meeting minimum stocking standards.

YOUNG STAND MANAGEMENT RESPONSE:

After timber harvest, regeneration harvests will be planted with a mixture of species native to the geographic area. Forest managers use site-specific information and management objectives to determine the appropriate mix of native species and stock type for each planting site. Forest health strategies are addressed on a site-specific basis when the planting plan is developed. Site-specific prescriptions consider target species, aspect, elevation, soil types, leave tree arrangement and density, Swiss needle cast risk where applicable, *Phellinus weirii* (laminated root rot) presence, required stocking guidelines, natural advanced regeneration, and the desired future condition of the stand. To accomplish this, a mixture of species is planted to provide for a healthy, productive, and sustainable forest ecosystem over time and to be more resilient to climate change.

Inside Habitat Conservation area, plantings will occur at lower densities and incorporate greater species diversity. Natural regeneration will be allowed to occur in some small areas. If needed, alternative management plans will be filed where replanting densities may be less than those required by the Forest Practices Act standards. Additional tree protection and vegetation management treatments will be based on site-specific conditions and management objectives. These treatments are intended to promote complex early seral stand conditions that have greater potential to develop into high quality habitat for the covered terrestrial species than more intensive

approaches used for timber production. Herbicide comments are addressed in the Aquatic, Water Quality, and Wildlife response.

AQUATIC, WATER QUALITY, AND WILDLIFE COMMENTS

- Opposes clearcuts and road building in conservation areas and priority salmon watersheds called "Aquatic Anchors".
- Opposes harvesting and road building inside Riparian Conservation Areas. (multiple commenters)
- Recommends conservation and preservation of the salmon population.
- Recommends 50-foot buffers on all small Type N potential debris flow and high energy streams when regeneration harvesting consistent with best available science.
- Recommends no clearcut harvesting within Aquatic Anchors to minimize adverse effects and be consistent with the best available science.
- Conduct an analysis of the cumulative impact of ongoing clearcutting within Aquatic Anchors and ceasing clearcutting within these areas until the analysis is complete.
- Buffer all hazardous areas on steep slopes above threatened coho salmon and other fish streams.
- Concerned with clearcutting proposed within the Cook Creek Aquatic Anchor as it poses a direct threat to Cook Creek and its tributaries.
- Concerned about the large acres of clearcut and roadbuilding within Aquatic Anchors in the North Coast districts and the effects on water quality.
- Concerned about negative impacts on fish species by nearly all of the sales proposed in the North Coast districts as they take place near streams containing threatened fish species.
- Recommends an analysis of the cumulative impact of ongoing clearcutting within Aquatic Anchors to ensure compliance with the Endangered Species Act.
- Prohibit all timber harvest and road construction within Riparian Conservation Areas.
- Stream enhancement planning should be integrated into the planning phase up front, not after a project has been laid out and designed to the level of being put into an Annual Operations Plan.
- Requests that more specific information and firmer commitments for stream enhancements with sufficient information be provided to allow for public review.
- Recommends flexibility with purchasers/operators when there are stream enhancement projects as in-stream work periods are short and usually align with fire season.
- Appreciate waivers in order to finish the work within the same operating season as the harvest.
- Proposed harvests in Astoria and Tillamook will accelerate the drinking water crisis on the coast.
- Protect drinking water sources from logging and chemicals.
- Recommends using existing mapping of all domestic and municipal water sources to avoid harvest and pesticide application near and upslope of all water sources.
- Use existing mapping of all domestic and municipal water sources to avoid harvest and pesticide applications near and upslope of all water sources. (multiple commenters)

- Confer with local residents on all water sources to avoid nearby harvests.
- Use existing mapping of all domestic and municipal water sources to avoid harvest.
- Develop a GIS overlay incorporating data from the Oregon Water Resources Department and Oregon Health Authority and allow self-reporting of unrecorded domestic water sources to ensure comprehensive protection. Within this overlay, prohibit clearcutting and pesticide use, allowing only vegetation management that promotes complex forest structure and old growth characteristics.
- Opposes the use of all chemicals, pesticides, and herbicides on state forests.(multiple commenters)
- Proposed spraying in Astoria and Tillamook will increase health problems.
- Eliminate the use of pesticides in state forests. (multiple commenters)
- Opposes all pesticide/herbicide applications in Astoria.
- Minimize or eliminate the use of pesticides.
- Recommends no pesticide applications near or upslope of all water sources.
- Opposes pesticides as they degrade insects and amphibians.
- No more aerial pesticide applications.
- No pesticide application near water sources or within watersheds.
- Use of herbicides on state forests should be phased out and should be prohibited near homes and water sources.
- No pesticide applications near and upslope of all water sources, both domestic and wildlife.
- Transparency is needed regarding which pesticides are applied, where, and when, as current information is not publicly accessible.
- Concerned about unintended glyphosate poisoning and recommend discontinuing use of this product.
- Concerned about wood rats and recommend banning pesticides.
- Concerned that glyphosate is a desiccant that dries out the forest adding to forest fires.
- Supports the approach in the Klamath Annual Operations Plan to address the needs of mule deer in the Crescent herd range.
- Recommends using seasonal road closures as an example for big game/wildlife security.
- Support efforts to conserve habitats for the wildlife in our forests.
- Opposes conservation and environmental practices that inadvertently heighten the risk of wildfire which burn forests, ruins habitats, and offsets efforts to reduce carbon emissions.
- Concern that some harvest will set back northern spotted owl and marbled murrelet recovery and survival.

AQUATIC AND WILDLIFE, RESPONSE:

Aquatic Protections: ODF implements riparian management and conservation strategies, stream enhancement projects and best management practices for roads and slopes, to promote the development of functional riparian forests with large healthy trees that provide shade, contribute to instream habitat complexity, and protect important riparian functions, ecological processes and

water quality. This includes measures such as riparian stream buffers, process protection zones, and equipment restriction zones to protect fish bearing, non-fish-bearing, perennial, seasonal, and domestic streams that serve important functions supporting aquatic habitat quality both within these waterways and affecting downstream waters.

Riparian Conservation Areas were designed to conserve and maintain riparian habitat for the protection and persistence of amphibian and aquatic covered species. The conservation strategies in the draft Habitat Conservation Plan were developed by a team with representatives from ODF, Oregon Department of Fish and Wildlife, Oregon Department of Environmental Quality, Oregon Department of State Lands, Oregon State University, U.S. Fish and Wildlife Service and NOAA Fisheries. Riparian Conservation Areas are implemented on all western Oregon state forests.

Domestic Water: All harvest areas are screened for registered domestic and municipal water points of diversions within or up to 3,000 feet downstream of the harvest area as per the Oregon Forest Practices Act using mapped water rights data from the Oregon Water Resources Division. The streams with these identified domestic or municipal water points of diversions are protected in accordance with the Oregon Forest Practices Act, Oregon Department of Environmental Quality Clean Water Act, State Forests Management Plans and the draft Habitat Conservation Plan in western Oregon state forests.

Water Quality/Herbicides: Harvest sites by law must be replanted, and ODF strives to use the minimum amount of herbicides necessary to achieve reforestation success. ODF plants a mix of different tree species, which will also affect site-specific herbicide application strategies. After harvesting, vegetation that competes with newly planted trees rapidly re-colonizes harvest units. Herbicides can be an effective tool to temporarily reduce competing vegetation which enables newly planted seedlings to establish and thrive, so there will be future forests for all Oregonians as well as the wildlife that depend on them.

ODF uses herbicides, but does not use insecticides nor rodenticides on state forests. Determination about herbicide use and type is done for each individual stand on a site-specific basis after the unit has been harvested and the brush development for the area is better known. When using herbicides, it is done in accordance with the product label and all applicable rules and laws to protect water quality, wildlife, and neighboring landowners. Licensed Contractors are hired to apply herbicides on ODF lands and are closely monitored by ODF contract administrators (who are also licensed applicators). ODF uses ground-based applications where practical. However, shifting to primarily ground-based applications would significantly increase costs and presents physical hazards to crews working on steep slopes.

ODF encourages all concerned citizens to sign up for FERNS e-notifications (options include notification of operations, location, timing, types of chemicals, change of status, etc.) as this is the easiest way to stay informed on upcoming operations across all forestland ownerships. The public can subscribe to receive information regarding forestry work or receive communications regarding helicopter pesticide applications within one mile of their home or surface water intake by going to: <https://www.oregon.gov/odf/working/pages/enotification.aspx> This webpage also contains videos to help with the subscription process.

Stream Restoration: State Forests has been committed to implementing stream enhancement projects on ODF-managed lands for more than two decades as a partner in the Oregon Plan for Salmon and Watersheds and in partnership with Oregon Department of Fish and Wildlife, local partners, and adjacent land managers. Stream enhancement, fish passage, and current riparian management area standards are designed to collectively improve processes and function of aquatic ecosystems over time and ultimately benefit resident and anadromous aquatic species.

In order to focus stream enhancement efforts where they will have the most uplift to aquatic species, the staff aquatic and riparian specialist utilizes desktop and field reviews to develop stream enhancement projects, often in collaboration with ODF districts, Oregon Department of Fish and Wildlife, and local watershed groups. Other local prioritization documents such as species specific strategic action plans, Rapid Bio-assessments, watershed assessments, etc. are utilized where available to help inform and focus enhancement efforts. Each year specialists review multiple potential stream enhancement opportunities – those that have a nearby timber sale, as well as those proposed by local partners.

ODF is working towards improving the timing of the stream enhancement planning process to provide more details in the Annual Operations Plan for the public to review in the future; however when working with external partners, timing may be subject to grant applications and fund release or other limitations. Changes in process and reporting will occur with approval and adoption of the draft Habitat Conservation and Forest Management plans for Western Oregon State Forests and will be reflected in future Implementation Plans.

Aquatic Anchors: Aquatic Anchor sites are geographically identified watersheds where salmon and aquatic conservation is of particular concern as part of Species of Concern policy associated with the current Northwest State Forests Management Plan. All streams on ODF-managed forestlands in western Oregon are protected by the draft Habitat Conservation Plan's aquatic and riparian strategies, including Aquatic Anchors. These strategies do not preclude or limit harvest or road building activities, but rather supplement existing riparian stream buffer protections to further bolster the conservation goals in these areas. While working in these Aquatic Anchors, operations follow the current forest management and implementation plans and policies, which include the draft Habitat Conservation Plan requirements during this transitional stage.

Wildlife: State Forests provide habitats for a wide variety of native wildlife, fish, amphibians, fungi, and plant species across the landscape. A combination of strategies are used to address habitat needs including: the use of silvicultural tools to attain an array of forest stand structures and habitat types across the landscape; retention and recruitment of key structural components such as snags, green trees, and down wood; riparian and aquatic management standards, stream restoration projects, and upslope components such as road and slope stability strategies; and site-specific plans such as modified harvest prescriptions or practices, seasonal restrictions, logging slash management, buffers, and resource site protection. The Eastern Region Long-Range Forest Management Plan uses strategies such as Critical Wildlife Habitat Areas, Forest Connectivity Areas, road closures, key structural components and site-specific plans to address wildlife habitat protection. ODF biologists work with field staff during sale planning and layout to implement strategies where needed to meet habitat objectives.

ODF partners with Oregon Department of Fish and Wildlife to implement seasonal road closures for travel management areas identified in hunting regulations to help ensure escapement opportunities for big game

In addition to the strategies described above, the Habitat Conservation Areas, updated Terrestrial Anchor sites, and updated desired future condition locations were delineated using current stands characteristics, connectivity principles, species of concern information, current and historic locations and habitat for marbled murrelets, northern spotted owls, and other covered species to protect and enhance existing habitat. Riparian Conservation Areas were designed to conserve and enhance riparian habitat for protection and persistence of amphibian and aquatic covered species. The conservation strategies in the draft Habitat Conservation Plan were developed by a team with representatives from ODF, Oregon Department of Fish and Wildlife, Oregon Department of Environmental Quality, Oregon Department of State Lands, Oregon State University, U.S. Fish and Wildlife Service and NOAA Fisheries.

ROADS AND SLOPES COMMENTS

Roads and Slopes: Road construction and harvesting on steep, landslide-prone slopes comments received include:

- Recommends keeping roads maintained and open for timber harvest, fire fighting and public use.
- Supports public access to state forest land to enjoy nature for personal wellness.
- Opposes road building on steep hillsides.
- Recommends buffering all landslide terrain crossed by a road with increased buffer width at the road crossing.
- Prohibit road building and timber harvest on steep, landslide-prone slopes that have the potential to degrade water quality and spawning habitat.
- Recommends fuel breaks for containing forest fires.
- Opposes clearcuts and road building on steep, unstable slopes. (multiple commenters)
- Recommends protecting Riparian Conservation Areas from harvesting and road building on steep slopes.
- Opposes clearcuts and road building on steep, unstable slopes that have the potential to degrade water quality and spawning habitat.
- Avoid clearcuts and roadbuilding on steep, unstable slopes.
- Opposes clearcuts and road building on steep, unstable slopes that endanger waterways, homes, public roads and animal habitat.
- Continue and expand the use of seasonal road closures inside Habitat Conservation Areas to promote big game security areas.

ROADS AND SLOPES RESPONSE:

Roads: A well-maintained road system is necessary to ensure resource protections, fire protection, and public access. The road system on State Forest lands is managed to keep as much forest land

in a natural, productive condition as possible while limiting impacts to resources in accordance with the Oregon Forest Practices Act and other applicable laws, current Forest Management Plans, draft Habitat Conservation Plan (where applicable), ODF guidance, and best management practices. The draft Habitat Conservation Plan does not prohibit road building inside Habitat Conservation Areas. Road construction in Habitat Conservation Areas will occur where economically or operationally feasible options outside of Habitat Conservation Areas are not available, or to support management activities within them.

Road construction within Riparian Conservation Areas is limited to areas where upland road placement options do not exist, are infeasible, or are cost prohibitive in accordance with the draft Habitat Conservation Plan. Road design specifications and best management practices will be followed to protect sensitive resources. All planned road construction is reviewed by a certified engineering geologist or professional engineer to ensure that the roads are located in stable locations and to provide the best protection for natural resources and public safety. Where older roads will be used, legacy features such as old fills or failing cut-slopes will be removed or repaired, and sections may be relocated away from sensitive areas.

Slopes: The proposed operations have been reviewed under the existing Forest Management Plans, the draft Habitat Conservation Plan, the Oregon Forest Practices Act, and Coho Settlement Agreement requirements. These requirements provide robust aquatic and riparian buffer rules and include additional protection measures and tree retention for areas of potential unstable slopes such as inner gorges, landslide initiation sites and their associated potential debris flow tracks, and high energy seasonal streams. These policies are designed to ensure forest resources are protected and that natural processes fundamental to healthy forest ecosystems continue. These documents specifically address landslides and describe a geologic evaluation process and unstable slope leave tree requirements. Landslides are important natural geological processes, which introduce critical habitat components that support spawning and rearing, such as large wood and gravel, into the stream network. Every operation is evaluated for locations of elevated landslide potential. Trees are retained on identified locations to provide for continued canopy cover and root stabilization of soils. Some small seasonal streams receive additional buffering below unstable slopes. If these sites fail in the future, retained trees will provide wood delivery to the stream network.

Best management practices are followed during forest operations such as road building, harvesting, trail construction, and site preparation to minimize soil compaction, protect soil structure and prevent erosion (surficial and mass wasting) and loss of organic materials.

In regards to public safety, as part of each operation's geologic review, homes and public roads that exist below proposed operations with steep slopes are evaluated for possible impacts by landslides. Leave trees are left on such slopes that could fail and impact public safety. Sometimes it is not possible to complete geotechnical reviews prior to finalizing district Annual Operations Plans and some field consultations are more effectively done during sale layout. All potentially unstable slopes and other geotechnical issues identified during Annual Operations Plan review or noted by foresters in the field are addressed prior to timber sales being sold.

PROCESS AND DOCUMENT IMPROVEMENT COMMENTS

- Recommends transparency in intended actions.
- Urges ODF follow notification procedure for proposed sales, or it will continue to lose public trust.
- Continue to improve communication and public education regarding the Annual Operations Plans process.
- Develop a strong monitoring and adaptive management framework to evaluate ecological outcomes and adapt as needed.
- Engage local communities and stakeholders into decision making processes to align forest management with social and cultural values.
- Show economic costs resulting from timber-related increases in atmospheric carbon dioxide and the economic benefits that result from conserving and increasing carbon stored in the forest.
- Show in the Annual Operations Plan the best available science used in decision-making regarding climate related economics, environmental and social benefits from managing the forests to conserve and increase forest carbon.
- Add a road construction layer to the GIS mapping tool. It would be helpful to see them with the other buffers.
- Requests public tours of proposed harvests within Habitat Conservation Areas for education and understanding of what the prescriptions look like on the ground.
- Annual Operations Plans should show that harvest prescriptions will benefit listed species and meet the goals and objects in the Habitat Conservation Plan by including thinning prescription and canopy retention.
- Concern that the draft Annual Operations Plans appear to be inconsistent with ODF's draft Forest Management Plan goals and strategies, Climate Change and Carbon Plan (Climate Plan), the conservation goals of the Habitat Conservation Plan, protection of Aquatic Anchors, and Key Performance Measures for state forests.
- Once Habitat Conservation Plan is approved, request to provide more information in the Annual Operations Plans describing how specific Habitat Conservation Areas for logging were chosen, data about the current condition, and how harvest improves habitat and meets biological goals of the Habitat Conservation Plan.
- Recommend changing product requirements inside of timber sale contracts to not charge bid species prices for utility grade timber.
- Appreciate improvements made to the fiscal year 2026 Annual Operations Plan that provided more complete information to the public for review.
- Recommend an audit to determine compliance with existing plans and policies.
- Concern that ODF is moving forward with clearcut despite large amounts of public disapproval.
- Recommends listening to people of Oregon comments instead of harvesting forests for financial gain.
- Increase willingness and improve effectiveness of communications with citizens.
- Recommends ODF follow notification procedure for proposed sales or it will continue to lose public trust.

- Recommend providing better transparency and respecting and listening to community members as they may have ideas and concerns that haven't been considered by ODF.

PROCESS AND DOCUMENT RESPONSE:

ODF provides useful and detailed information during the Annual Operations Plan process for the public to review and provide feedback. This information also demonstrates how the Annual Operations Plans are aligned with higher level plans and processes. While the Annual Operations Plans and individual Pre-Operations Reports provide a wealth of information, ODF recognizes there is always room for improvement to make them more useful and accessible. Comments that target process and document improvements will be evaluated and considered for improvements during the fiscal year 2027 Annual Operations Plan process.

Public Outreach and Comment Consideration: Each year ODF receives a wide range of comments that touch on a variety of topics and perspectives. This year there were several comments that expressed concern about how feedback should or should not influence Annual Operation Plan forest management, activities and outcomes. As described throughout this response document, the Annual Operations Plans are just one part of a much larger planning and policy structure (Oregon Laws, Forest Management Plans, draft Habitat Conservation Plan, and Implementation Plans) that provide the ODF direction on its management activities and resource protection measures in order to implement the Greatest Permanent Value to all Oregonians. This framework directs the work of forest managers and shapes the forest management and activities that are described in this Annual Operations Plan. Candidate operations and activities go through rigorous review, beginning with their initial screening by field foresters, planning staff and other specialists. Threatened and endangered species surveys, property line surveys and other supporting activities are conducted as needed. Additional field, leadership, and technical specialist reviews are completed prior to meeting with other state agencies to gather their input. Finally, public comments are solicited and reviewed to identify additional concerns.

Public comments that are focused on recommendations to change the higher-level policy and plans are generally out of scope for Annual Operations Plans and commenters may feel that their input is being ignored. While these comments do not result in changes to the Annual Operations Plans, they are considered and are useful in discussions around future policy and plan goals and objectives. Comments that are focused on suggestions to improve the efficiency or effectiveness of the planned activities, request clarification on how they are described, provide additional local knowledge that may not have available to planners, identify errors in the documentation, or suggest solutions to address site-specific concerns are the most likely to result in changes and improvements to the Annual Operations Plans.

SPECIFIC SALE COMMENTS

In addition to the comments that are summarized above, we received specific comments on individual sales on the Astoria, Forest Grove, Tillamook, North Cascade, West Oregon, and Western Lane Districts. These specific concerns and recommendations covered a wide range of

topics including: canceling specific harvests, doing more harvests, modifying harvest types and leave tree strategies, changes to desired future condition, buffering trails, harvest challenges, green strip buffers, modifying or eliminating herbicide/pesticide application plans, young stand management modifications, additional resource protections (wildlife, water, soils, unstable slopes, public safety, scenic, etc.), road project modifications and road rocking considerations, marketing strategies, contract language, considerations for adjacent landowners, or providing additional information for consideration.

SPECIFIC SALE RESPONSE:

All of the sale specific comments have been reviewed and considered by ODF staff. Some of the individual comments have resulted in no changes while others have prompted adjustments or will be further considered as projects are laid out in the field. Changes that have been made since the public comment period have been documented in the last section of this document and in Appendix “D” of each district Summary Document.

OUT OF SCOPE COMMENTS

Comments that were out of scope:

- Opposes importing wood. (multiple commenters)
- Recommends a West Coast Forest Service Air Force to help put out wildfires.
- Do not sell our public lands to corporations.
- Request for re-opening or building of mountain bike trails on Lolo Pass Road. (USFS)
- Please think through every aspect of ODF policy.
- ODF should implement statewide fire breaks to prevent large wildfires.
- Disappointed that the Davis Ridge timber sale went through before the public comments deadline.
- Recommends bringing back the severance tax for lumber companies.
- Concerned about smoke and related health risks and recommends banning prescribed burning.
- Request that ODF provide analysis that demonstrates the riparian buffers are sufficient to protect and restore the covered salmonid species taking into account the findings that un-managed stands significantly increase the amount of water flow in western Oregon forests.
- Revise mapped desired future condition location to include and be consistent with the desired outcomes of the Habitat Conservation Areas
- ODF should assist counties in transitioning away from clearcutting and automation and into a sustainable economy based on selective logging, recreation, and eco-tourism, severance taxes, and revenue from Real Estate Investment Trusts and Timber Investment Management Organizations that liquidate forestland.
- Revise mapped desired future condition location to include and be consistent with the desired outcomes of the Habitat Conservation Areas.

DISTRICT SPECIFIC CHANGES

The following is a summary of changes that have been made to fiscal year 2026 Annual Operations Plan documents based on the feedback that was received and new information that we have learned:

Astoria District

Primary/Alternate Changes

- Dropped Mothball Hill from the list of potential sales
- Moved Ridge Walker from an Alternate to a Primary Sale

Pre-Operation Reports

- Modified Ridge Walker to reflect new Primary Sale status

Summary Tables

- Modified Tables A1, A2, and A3 to reflect changes to Primary and Alternate Sales
- Added Walker Ridge/Sager Brushing to Work Order List on Table A-3

Summary Document

- Modified Summary Document to reflect changes to Primary and Alternate Sales
- Modified Summary Document to include the Walker Ridge/Sager Brushing Work Order Contract
- Updated language in the introduction for clarity around plans and policies followed for the Annual Operations Plans.

Forest Grove District

Primary/Alternate Changes

- Fiscal year 2025 Alternate North Sun was moved to fiscal year 2025 Primary. It has been removed as a Primary sale from the fiscal year 2026 Annual Operations Plan.
- Fiscal year 2025 Primary Sidewinder has been moved to fiscal year 2026 as a Primary sale, and 4 acres have been added to the sale. Resource Specialist review of the additional acreage has been completed.
- Fiscal year 2026 Beaver Power has been changed from Alternate to Primary.

Pre-Operation Reports

- Stream buffers have been updated after stream surveys were completed: Big Leaves, Rap Reimer, Sappy, Sidewinder, Upper Bound, Williams Point, C-Lion (Alternate), Scoggins Down (Alternate), Thin to Win (Alternate), Three Divides (Alternate)
- Sale Quarters have been adjusted on the following sales: Beaver Power, Big Leaves, Jordan-Lyda, Mini Lyda, Rap Reimer, Sappy, Sidewinder, Standard Bearer, and Steppinout.
- Mini Lyda: Updated wording on the status of the research plots within the sale boundary. Planned road work language was updated for clarity.

- Big Leaves: Leave Tree Considerations language was updated for clarity. Road construction in RCA language was updated for clarity.
- Added source of imputed stand age: Steppinout, Thin to Win
- Project Work Updates:
 - Beaver Power and Standard Bearer: Project work has been removed from both sales. Sales will be pre-roaded with fiscal year 2025 sales Saddle Time and Wolf's End, respectively.
 - Big Leaves: 0.1 mile of road vacating added to vacate 2 Type F crossings that are no longer needed.
 - Sidewinder: Road vacating removed from sale.
 - Upper Bound: The rock source has been changed from Seven Cedars Quarry to Seven Cedars Stockpile.

Summary Tables

- Updated to reflect minor acreage/value changes resulting from updates.

Summary Document

- Updated to reflect minor acreage/value changes resulting from updates.
- Updated language in the introduction for clarity around plans and policies followed for the Annual Operations Plans.

Misc

- South Fork Road Improvement Work Order Contract has been combined with Jordan-Lyda Timber Sale Project Work.

Klamath Lake District

No changes made

North Cascade District

Primary/Alternate Changes

- None

Pre-Operation Reports

- None

Summary Tables

- None

Summary Document

- Minor wording changes to the Summary Document for accuracy and clarification.

Misc

- None

Tillamook District

Primary/Alternate Changes

- None

Pre-Operation Reports

- Geotechnical buffers for Bushong, Bushong Rd., Cook Creek Overlook, Edward's Creek, Star Creek, West Forks Creek, and ZZ Tops updated.
- Leave Tree Considerations section updated for: Cook Creek Overlook, Cronin Too, and Edward's Creek – stand characteristics bullet/language added.
- Updated Exhibit A for Mesabi Road (Unit 40) to include stream not displayed in previous version.

Summary Tables

- Updated to reflect minor acreage/value changes resulting from updated no harvest buffers.

Summary Document

- Updated language in the introduction for clarity around plans and policies followed for the Annual Operations Plans.
- Added Oregon Department of Agriculture consultation to Appendix C and "Beyer Point" Pre-op report.
- Quarry development language updated in Annual Operations Plan summary document to include specific quarry names of those planned to be used for timber sales.

West Oregon District

Primary/Alternate Changes

- None

Pre-Operation Reports

- Corrected the legal description on the Miller Minute Pre Operations Report Map

Summary Tables

- Corrected the net value total in the Summary Table A-1 to include the Work Order Contract subtotal.

Summary Document

- Minor wording changes to the Summary Document for accuracy and clarification.

Misc

- None

Western Lane District

Primary/Alternate Changes

- None

Pre-Operation Reports

- Biological/Habitat assessments were added to the following sales:
 - Nelson Nebulous (ALT)
 - Wind Chime
 - Windy Gust (ALT)
- Leave Tree Considerations language was updated for clarity in all reports.
- Updated acres in the Wind Chime report to include existing road.

Summary Tables

- Updated acres for the Wind Chime sale.

Summary Document

- Updated language in the introduction for clarity around plans and policies followed for the Annual Operations Plans.