

## Forest Trust Land Advisory Committee Meeting

Virtually hosted by AOC

<https://odf.zoom.us/j/94802097233>

February 19th, 2021

9:30 a.m. – noon

9:30 – 9:45	<b>Chair Opening Remarks</b> <ul style="list-style-type: none"><li>• Introductions</li><li>• Approval of August 23rd, 2019 meeting minutes</li><li>• Public Comment</li></ul>	<i>David Yamamoto, Chair</i>
9:45 – 10:00	<b>Comments from the State Forester and BOF Chair</b>	<i>Peter Daugherty Tom Imeson</i>
10:00 – 10:15	<b>Santiam Implementation Plan</b>	<i>Liz Dent and Ron Zilli</i>
10:15 – 11:00	<b>Public Access and Rule Making</b>	<i>Liz Dent &amp; Justin Butteris</i>
11:00 – 11:30	<b>Update on HCP and NEPA</b>	<i>Division Staff</i>
11:30 – 12:00	<b>Discuss FTLAC Testimony for March BOF Meeting</b>	<i>David Yamamoto/Lauren Smith</i>

*In order to provide the broadest range of services, lead-time is needed to make the necessary arrangements. If special materials, services, or assistance is required, such as a sign language interpreter, assistive listening device, or large print material, please contact our Public Affairs Office at least twenty-four hours prior to the meeting via telephone 503-945-7200 or fax 503-945-7212. Use of all tobacco products in state-owned buildings and on adjacent grounds is prohibited.*

March 2021 Board of Forestry Meeting State Forests Topics  
*Draft* Material and Staff Reports under Development by the State Forests Division  
Prepared for Review by the Forest Trust Lands Advisory Committee  
*January 14, 2021*

Two State Forests Board of Forestry Topics:

1. *Public Use Rule Making*
2. *Santiam State Forests Implementation Plan Revision*

#1: State Forests Board of Forestry Topic: Public Use Rule Making

The Division is taking two Oregon Administrative Rules (OARs) to the Board regarding public use. The first rule addresses public use closures and the second modifies the language of the existing parking fee rule to be made consistent with Oregon Parks and Recreation Department OAR following an Appellate Court ruling on recreational immunity.

Forest Closures

The devastating Labor Day fires resulted in significant damage to forest resources, including trails and roads, and unsafe conditions. As a result, in order to prevent further resource damage, the Santiam State Forest was closed to the public. This closure brought to light a deficiency in the Oregon Administrative Rules in terms of implementing the closure and establishing a clear penalty for violation of the closure order.

The Department promulgated a temporary rule in November to articulate the implementation of the closure and to establish the penalty for violation is criminal trespass. Temporary rules expire after 180 days, unless adopted as a permanent rule. The Division will be taking the rule to the Board to promulgate the permanent rule.

Recreational Immunity

The Oregon Court of Appeals recently ruled in the McCormick v. State of Oregon case, which is a recreational immunity case. At issue was whether the \$5 fee paid for by the plaintiff waived recreational immunity. The Court ruled the fee was paid for parking and since recreational immunity is not waived for parking fees of less than \$15, the State is entitled to recreational immunity. The State was able to very clearly demonstrate the fee was a parking fee and not a fee for recreational purposes, because Oregon Parks and Recreation Department (OPRD) had promulgated a rule that stated this plainly. The Department of Forestry will propose making a change to its OAR on parking fees to the Board, with the intent to use the same language as OPRD.

**Current Status**

The Department promulgated the temporary rule in November 2020 and it will expire May 19, 2021 unless adopted as a permanent rule. The Division will begin permanent rulemaking following Board approval.

## Requested Board Action

The Division will seek Board approval to move forward with permanent rulemaking in March.

## Proposed OARs

The highlighted text of OAR 629-025-0030 is the new text proposed to be added. OAR 629-025-0091 is a new rule in its entirety.

### 629-025-0030 Other Fees

- (1) A Person must pay the applicable fee for use of Campgrounds, Camping Areas and other listed facilities and services.
- (2) Payment of Fees: Unless posted otherwise, payment of fees must be made prior to receipt of the permit or use of the facilities and services. Permit fees are non-refundable. Overnight camping fees are for the use of facilities until 1:00 p.m. of the following day.
- (3) Established Fees: Specific fees for permits, facilities and services, are as follows:
  - (a) Camping in a Campground at a:
    - (A) Vehicle site: \$20 per night;
    - (B) Walk-in site: \$15 per night;
    - (C) Designated Camping Area: \$5 per night per Motor Vehicle.
  - (b) Camping at a group site: \$50 per night.
  - (c) A fee of \$5 per night, per Motor Vehicle must be paid by a Person who allows more than two automobiles or four motorcycles to be parked overnight at a Designated Campsite reserved by that Person. This charge is a parking fee and not a charge for recreational purposes under ORS 105.672 to ORS 105.696. The immunities provided under ORS 105.682 apply to use of state forest land for recreational purpose.
  - (d) Parking in a designated parking area: \$5 per vehicle per 24 hour period. This charge is a parking fee and not a charge for recreational purposes under ORS 105.672 to ORS 105.696. The immunities provided under ORS 105.682 apply to use of state forest land for recreational purpose.
- (4) Firewood: Where conditions permit, firewood may be sold by the Forester.

### OAR 629-025-0091

- (1) The State Forester may establish portions of State Forest land that are closed or limited to specific uses or activities by the public. These may differ from State Forest land to State Forest land and from time-to-time, but shall be indicated on the Department website, and on posted signs at the State Forest land that is closed.
- (2) Closures will be identified by signs at major points of entry to the restricted portions of the forest and notices placed on the Department's website.
- (3) A person may not enter or occupy State Forest land that has been ordered closed by the State Forester.
  - (a) A person engaging in work under contract with the Department of Forestry may be exempt with written permission from the Forester or their designee.
  - (b) This restriction does not apply to state employees or law enforcement officers in the performance of their official duties.
- (4) A Department employee may seek compliance from the public with a State Forest closure, and may order a person that enters closed lands to leave State Forest land.

- (5) A peace officer may seek compliance from the public with a State Forest closure, and may order a person that enters closed lands to leave State Forest land.
- (6) The State Forester may designate to Department employees the authority to protect forest resources under section (1). This authority includes actions that may:
- (a) Permit or limit specific activities or uses in designated portions of State Forest land;
  - (b) Designate a location within a State Forest for a single use to avoid conflicts between users;
  - (c) Restrict access to or close an entire State Forest land;
  - (d) Restrict access to or close a portion of State Forest land; or
  - (e) Exclude a person from State Forest land.
- (7) A person excluded from State Forest land may contest the exclusion notice by filing a written appeal within seven days of the exclusion date. The person excluded must submit the appeal to the District Forester responsible for the State Forest land where the notice of exclusion was issued.
- (8) The following situations are criminal trespass in the second degree, a Class C misdemeanor, per ORS 164.245:
- (a) A person ordered to leave State Forest land that remains present;
  - (b) A person excluded from State Forest land that enters or remains present;
  - (c) A person enters a closed or restricted portion of State Forest land; and
  - (d) A person engages in an activity that has been specifically prohibited or restricted on State Forest land or a portion of State Forest land.

## #2: State Forests Board of Forestry Topic: Santiam State Forest Implementation Plan Revision

The Division is preparing a brief update to the Board on the effort to restore and recover the Santiam State Forest following the devastating Labor Day fires of 2020.

The Division's approach can be thought of as three overarching phases and associated management foci:

1. Assessment: Inventory of impacts and conditions to prioritize our work.
2. Recovery: Stand Management (Post-Fire Harvest and Reforestation), Repair (roads, recreation), and Protection (environmental protection standards and cultural resource sites)
3. Restoration: Recovery is designed and implemented consistent with restoration vision, policies and management for years to come (range of reforestation techniques and tree species, diversity of forest conditions, carbon sequestration, recognition of draft HCP conservation goals and measures). Restoration plan is under development.

### **Current Status**

The Division has completed the assessment of the impacts and conditions, which are reflected in the draft Implementation Plan (IP; Attachment 1). The draft IP was initially released for a 30 day public comment period, which was extended by another 12 days. A virtual public forum was held on December 8, 2020. The State Forests Division gave a presentation to the Marion County Commission and extended offers to the Linn and Clackamas county commissions.

Public comment on the IP is summarized (Attachment 2). In all, ODF received 1,155 written comments related to the Implementation Plan revision and/or Santiam State Forest restoration generally, including 1,091 from organizational email campaigns. The Oregon Department of Fish and Wildlife and Department of Environmental Quality also submitted comments. Major themes from the comments included salvage logging, recreation and access, reforestation, forest management, roads, wildlife, funding, and fire prevention.

The draft IP reflects the work to be done in the recovery phase over the next few years. This work represents a set of actions, consistent with GPV, on a proportion of the burned areas, with practices that support long-term restoration of the forest over the next several decades. The IP is expected to be finalized around the beginning of February.

The Division is readying for the final phase, restoration, as well. A project lead has been identified and the project charter is in development. The charter will identify the desired outcomes, deliverables, project team, and timelines.

### **Requested Board Action**

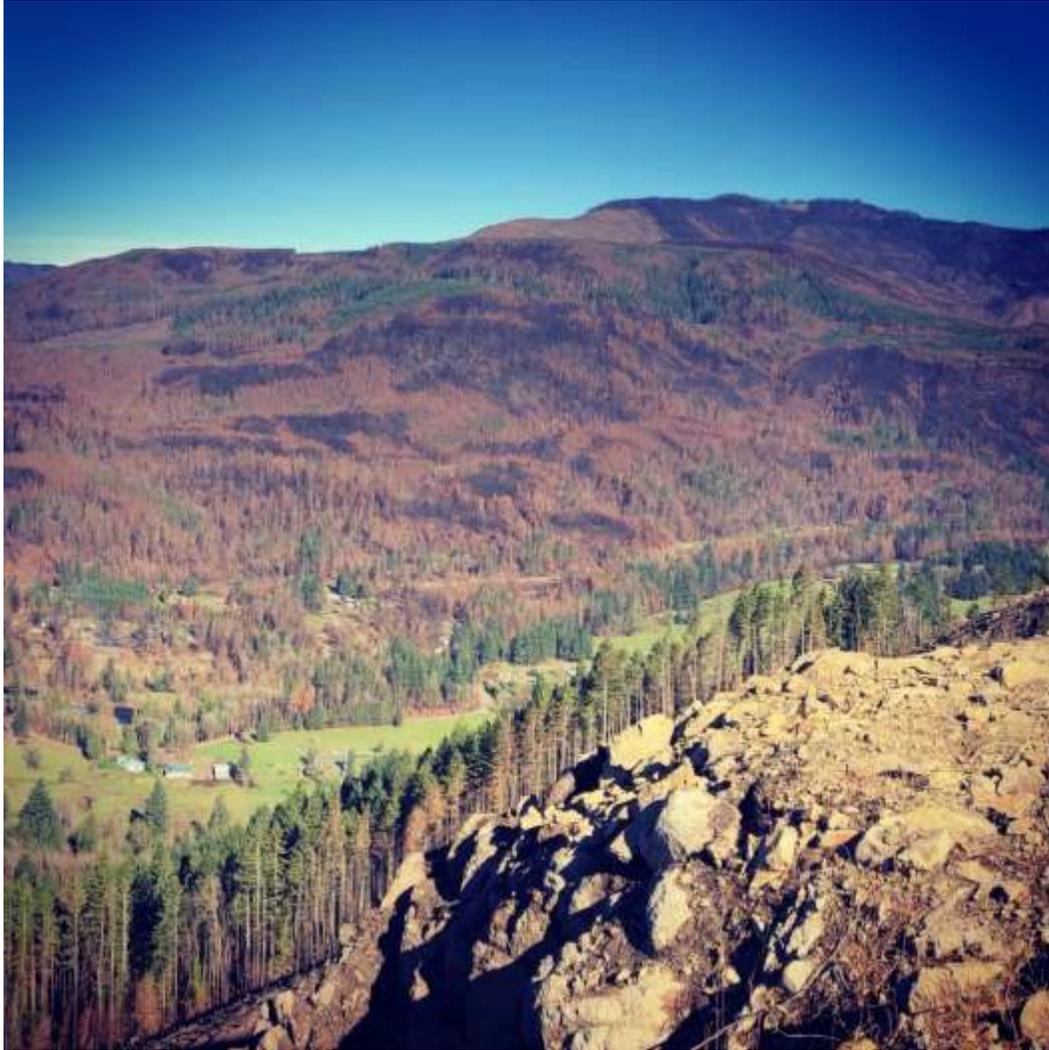
This topic is an information update with no action by the Board requested.

### **Attachments**

1. Draft North Cascade District Implementation Plan
2. Summary of Public Comment

# North Cascade District

## Draft Implementation Plan Major Revision



*Image of the Packsaddle & Niagara areas on the Santiam State Forest as seen from Potato Hill*

November 2020



# Table of Contents

INTRODUCTION .....	3
<b>Land Ownership</b> .....	<b>4</b>
<b>Current Stand Conditions</b> .....	<b>4</b>
PROPOSED RESTORATION ACTIVITIES.....	6
<b>Reforestation and Young Stand Management</b> .....	<b>6</b>
<b>Roads</b> .....	<b>7</b>
<b>Recreation</b> .....	<b>8</b>
<b>Harvesting</b> .....	<b>9</b>
<b>Cultural Resources</b> .....	<b>10</b>
<b>Aquatic Habitat Restoration</b> .....	<b>10</b>
MONITORING AND ADAPTIVE MANAGEMENT .....	11
MAP SECTION .....	12

# Introduction

The Oregon Department of Forestry manages over 760,000 acres of forestland throughout the state. These forests are managed to create resilient productive forests that support rural schools and communities, timber related economies, high quality habitat for fish and wildlife, recreational experiences, and clean air and water. Among these lands is the Santiam State Forest.

In early September of 2020, the Santiam State Forest saw extensive damage from the Beachie Creek, Lionshead and Riverside Fires. Approximately 24,700 acres (52%) of the Santiam State Forest were within the fire perimeters. The fire severity ranged from areas of no burn, to high intensity stand replacing fire, creating a mosaic of fire affects across the landscape (Figure 1).

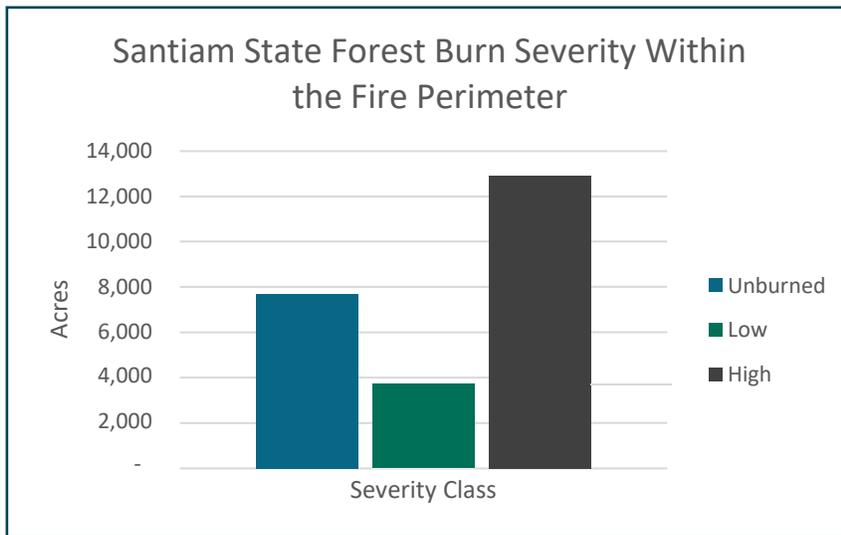


Figure 1. Santiam State Forest by burn severity. Burn Severity estimated from Sentinel 2 imagery collected on 8/10/2020 and 9/29/2020 by calculating the change in vegetation between the two satellite images.

In order to begin the restoration process, several components of the 2012 North Cascade District Implementation Plan need to be revised to address the significant restoration and salvage activities that will be occurring in the short term starting now in Fiscal Year 2021 (FY21) through the end of Fiscal Year 2023 (FY23) (June 30, 2023). This document will broadly characterize the types of restoration activities that will occur within this three year timeframe.

ODF will design and implement a management plan to restore a healthy, productive working forest with resilient forest ecosystems in context of the Greatest Permanent Value rule (OAR 629-035-0020). This will be achieved by meeting the following objectives:

- Provide for public and employee safety.
- Implement a range of timber salvage methods consistent with the desired future forest conditions and current resource protection policies.
- Promote reforestation to align with desired future forest conditions through silvicultural activities that include a range of reforestation methods.
- Protect and maintain water quality.
- Conduct restoration activities to protect, maintain and enhance fish and wildlife habitat.

- Implement forest management consistent with the biological goals and objectives of the draft Western Oregon State Forests Habitat Conservation Plan and the current Northwest State Forests Management Plan (NWFMP).
- Restore and enhance diverse recreational opportunities.
- Develop unique interpretive opportunities to educate Oregonians about healthy working forests, fire effects and recovery.
- Conduct monitoring of post-fire effects, treatments and recovery.
- Evaluate and participate in relevant post-fire research projects in conjunction with federal and non-federal land managers.

### ***Land Ownership***

The Santiam State Forest Contains 47,465 acres and is located in the foothills of the Cascade Mountains in Oregon. The Santiam State Forest is managed by the North Cascade District. The acreage in the Santiam State Forest is distributed between three counties, as displayed in the table below. The ownership is primarily Board of Forestry Lands (98 percent), with a small amount of Common School Forest Lands (2 percent). Other forest lands in the counties are held by a mix of landowners: United States Forest Service, Bureau of Land Management, private timber companies, and small private landowners.

**Table 1. North Cascade District Acres, by County and Ownership**

<b>County</b>	<b>Board of Forestry</b>	<b>Common School</b>	<b>Total Acres</b>
Clackamas	7,157	113	7,270
Linn	21,139	88	21,227
Marion	18,290	678	18,968
<b>Total Acres</b>	<b>46,586</b>	<b>879</b>	<b>47,465</b>

### ***Current Stand Conditions***

The fires caused damage on approximately 16,600 acres across the district. The district has been able to do an assessment on roughly 14,000 acres within the fire perimeter. The remaining acres are mostly in the low burn severity class and many are located within scattered ownership blocks.

Fire impacts and post fire management activities are considered in the context of NWFMP forest management principles. The foundation of the current NWFMP is to create a diverse set of forest conditions over time and across the landscape. This desired future condition (DFC) promotes five structure types:

- Regeneration (REG): Young stands with newly established trees, grasses, herbs and shrubs.
- Closed Single Canopy (CSC): Stands in which the tree crowns have closed together, creating a closed canopy where very little light reaches the forest floor.
- Understory Development (UDS): Stands with some openings in the canopies and some canopy layering; these stands have newly established shrubs, herbs, and shade-tolerant trees in the understory.
- Layered (LYR): Open stands that have significant understory development. Vigorous herbaceous and shrub communities combine with tree crowns to create multiple canopy layers. Tree crowns and shrubs create a complex vertical structure from the forest floor to the tops of the tallest trees.

- Older Forest Condition (OFS): Stands with large trees; multiple, deep canopy layers; substantial amounts of coarse woody debris; large snags; and other structures typically associated with older forest.

These structure types are designated in a functional arrangement across the landscape resulting in a “landscape design.” A subset of watersheds and portions of the upland landscape have further been designated as Terrestrial and Aquatic Anchors with specific objectives for species of concern. Table 2 reflects by management basin the impacted acres that have been assessed after the fires. The current condition of the unburned acres and targets for desired future stand structure are also shown in Table 2. The landscape design, the location of Terrestrial and Aquatic Anchors and the Forest Land Management Classifications (OAR 629-035-0055) have not changed.

**Table 2. Summary: Current Condition (CC) and Desired Future Condition (DFC), by Stand Structure and Percentage**

Management Basin	Acres	Current Stand Condition <sup>1</sup>							Desired Future Condition <sup>2</sup>	
		NSC/ Non Forest <sup>3</sup>	Burned Acres <sup>5</sup>	Unburned Acres					LYR	OFS
				REG	CSC	UDS	LYR	OFS		
Butte Creek	9,970	4%	30%	5%	5%	34%	16%	7%	27%	14%
Cedar Creek	4,186	0%	5%	8%	12%	55%	15%	6%	4%	4%
Crabtree	1,843	0%	0%	60%	9%	23%	8%	0%	0%	0%
Green Basin <sup>4</sup>	12,201	1%	71%	0%	1%	26%	1%	0%	28%	4%
Mad Creek	6,604	0%	33%	2%	10%	24%	26%	5%	11%	14%
Rock Creek	12,661	2%	0%	6%	5%	49%	26%	12%	27%	33%
<b>District Total</b>	<b>47,465</b>	<b>1%</b>	<b>29%</b>	<b>6%</b>	<b>5%</b>	<b>36%</b>	<b>16%</b>	<b>7%</b>	<b>20%</b>	<b>15%</b>

<sup>1</sup> The Current Condition was determined using the latest Stand Level Inventory imputed 2018 (SLI 2018).

<sup>2</sup> The Desired Future Condition on the district will be achieved in an estimated 70-90 years. The DFC percent is for the entire basin including burned acres.

<sup>3</sup> NSC/Non-Forest (Non-Silviculturally Capable and Non-Forest lands). Non-Silviculturally Capable lands are not capable of growing forest tree species (defined in OAR 629-035-0040). Non-Forest lands are those areas, greater than 5 acres, that are maintained in a permanently no forest condition (examples include district offices, work camps and large power line right-of-ways).

<sup>4</sup> Acreage for the Scattered Basin is included in Green Basin.

<sup>5</sup> These are the estimated acres burned in the Beachie Creek, Lionshead and Riverside Fires that have been assessed by the District.

**Table 3. Initial assessed burned acres**

Category	Acres Affected
Plantations needing to be replanted	3,600
18-40 year old stands that need treatment (Non-commercial tree removal) to be replanted	1,500
Operability issues, low volume, low value, high landslide hazard locations, non-forest, administrative sites, etc.	5,400
Identified for initial restoration/salvage harvest	3,500
Total assessed burned acres <sup>1</sup>	14,000

<sup>1</sup> There are additional burned acres that have not yet been assessed due to access constraints.

# Proposed Restoration Activities

## *Reforestation and Young Stand Management*

The North Cascade District typically plants an estimated 250,000 seedlings a year, enough for around 500 acres of initial plant and 150 acres of interplant. The impacts of the fires have drastically changed reforestation needs on the district. Roughly 3,600 acres of stands aged 0-30 years were completely lost to the fires and will need to be replanted. Approximately 3,500 acres of stands over 30 years old are proposed for salvage logging and will be subject to Forest Practice Act reforestation laws. In addition to the reforestation needs from the fire, there are active timber sales within the district that will be completed within this IP period and will also need to be reforested. To accomplish all the reforestation needs and requirements, the district will need approximately 3,000,000 seedlings. To accomplish longer term restoration needs to restore healthy forests, the district will potentially need another 3-4,000,000 seedlings. Aerial seeding and natural regeneration will be utilized to accomplish restoration goals in areas that have difficult access or safety concerns for planting due to remaining hazard trees.

Table 4 describes the annual silvicultural activities that will occur during this IP. Site preparation may include one or more of the following occurring on the same acreage: machine slash piling, pile burning, broadcast burning, or vegetation control with herbicides. Reforestation acres may be different than regeneration harvest acres because they do not relate directly to the regeneration harvest acres for that fiscal year. There may be additional acres due to units being held over for site preparation or units being harvested in the first year of their contract period. Animal damage control work may include one or more of the following conducted on the same acreage: mountain beaver, or tree tubing. Release work may include vegetation control using herbicides or hand or power tools. Precommercial Thinning acres shown represent a range dependent on annual workloads and budget levels. Under normal circumstances. During years of low fiscal budget levels, these estimates could fall to zero. Fire impacts amplify financial constraints and may shift financial investments away from precommercial thinning and towards reforestation. Precommercial thinning would be occurring mostly outside the fire perimeter. There may be a few stands inside the fire perimeter that didn't burn that may be treated. Non-Commercial Tree Removal occurs within stands between 18-40 years old where the trees need to be removed in order to replant a unit, but there is no commercial value to the trees harvested.

**Table 4. Annual Silvicultural Activities Starting in Fiscal Year 2021**

Activity	Estimated Annual Acreages
Site Preparation	200 – 3,500 acres
Reforestation	200 – 3,500 acres
Animal Damage Control	100 – 3,500 acres
Release	0 – 3,500 acres
Precommercial Thinning	0 – 1,500 acres
Non-Commercial Tree Removal	0 - 1,500 acres



*Image of burned plantation*



*Image of burned trees of non-commercial size*

## ***Roads***

There are approximately 190 miles of road inside the fire perimeter. To mitigate public and employee safety concerns, an inventory of the affected road system was conducted, including inspecting all culverts and bridges. Approximately 180-185 miles of road have been assessed as of November 17, 2020. Remaining roads that need to be assessed are located on remote scattered tracts. Table 5 below details the findings for culverts that have been assessed.

**Table 5. Road Culvert Safety Assessment**

Culverts within Fire Perimeter	1,254
Culverts Inspected	1,169
Culverts Needing Replacement	112
Culverts Requiring Maintenance	234



*Image of a burned out culvert*

In addition to the culvert work, 19 sections of road were identified that require some sort of restoration work such as debris removal, road bed repair, bank stabilization, etc. Roads were also assessed for roadside trees that pose a danger to public and employee safety. Approximately 79 miles of road have hazard trees that need to be removed, with 43 miles identified as having a high number of hazard trees and 36 miles having a low number of hazard trees. The culvert, road repair and hazard tree removal will occur during this IP period with the use of work order contracts and in conjunction with salvage harvests.



*Image roadside hazard trees*

## ***Recreation***

Recreation opportunities on the Santiam State Forest were impacted from fire damage in varying degrees. Initial assessment work has occurred at all of the designated recreation sites and trails within the Santiam State Forest. Assessment work will continue through the winter months and into the spring. The most significant impact occurred in the Shellburg Falls and the High Lakes Recreation areas. The Santiam Horse Camp, Monument Peak trail system as well as trails in the Niagara area were also impacted by fire. Trails and recreation infrastructure within the fire have suffered damage resulting in the need for facility infrastructure repair, trail tread rehabilitation, trail relocation, stair/handrail replacement, and culvert or bridge replacement.



*Image Horse Camp sign*



*Image Horse Camp corral damage*

In the short term, the Recreation Education and Interpretation (REI) team will be engaged in recreation facility and trail restoration and repair work to address public safety, investment protection, and resource impacts. As restoration and recovery work progresses, the REI team will transition into a recreation planning effort focused on the redesign of recreation facilities and trail systems that reflect the change in forest setting and offer interpretive and educational opportunities. In addition, the REI program will develop conceptual plans for new trails and facilities to enhance and support recreational needs into the future.

The forest setting around recreation facilities and trails have been changed by the fire and can be further changed by salvage harvest activity focused on forest recovery and restoration. When

salvage harvest plans are to occur along or adjacent to trails and recreation facilities, harvest prescriptions will focus on providing for public and staff safety and to maintain or enhance legacy structure retention where possible to provide for and enhance recreation experiences.

Recreation facilities and trails listed above as having been significantly impacted will be closed to public access for extended periods to ensure public safety and allow for hazard tree removal, forest road repair, salvage logging operations, reforestation and facility and trail repair. The team will develop a public access management plan that reflects the progression of restoration, recovery and safety mitigation work.



*Image of hazard trees*



*Image of trail damage*

## ***Harvesting***

It is difficult to determine the amount of salvage harvest that will occur while conducting forest restoration operations. This is due to several factors that cause uncertainty in planning including:

- Variability in burn severity and resulting damage to the trees
- Limited time to recover marketable burned timber due to decay
- Timber market conditions
- Operator availability

The actual fire damage to wood quality is unknown. Fire killed timber starts to deteriorate quickly with warm weather and its marketability quickly falls over time. The amount of charred wood and resulting merchantability is uncertain. Many acres of private forest burnt during the September fires which is expected to saturate near term timber supply and may constrict the available operator pool. These factors create a high degree of uncertainty as to how much harvesting will take place. Most of the salvage harvesting on the district will be prepared and sold by June 30, 2021. For FY21, the harvest acres will be at the top of the ranges in Table 6. The volume and acreage estimates for FY22 and FY23 are currently unknown, but are expected to be lower than FY21. Harvest in these two fiscal years will likely consist of any additional tree mortality due to stress from the fire, beetle kill, drought or other conditions. The level of harvest needed to address these situations are also uncertain, but it is likely they would range from the lower end to perhaps the middle of the harvest acres ranges. Where burnt wood cannot be harvested, alternative methods to restoration and fire hazard reduction will be researched and implemented.

**Table 6. Annual Regeneration Harvest and Partial Cut Acreage Ranges**

Regeneration Harvest Acres	Partial Cut Harvest Acres
110 - 3,500 <sup>1</sup>	0 - 1,200

<sup>1</sup> Most of the salvage harvesting will be prepared and sold in FY21. For FY21, the harvest acres will be near the top of the range. The acreage estimates for FY22 and FY23 are currently unknown but expected to be lower than FY21.



*Image of the mosaic nature of the burn*

### ***Cultural Resources***

Cultural resources are scattered throughout the forest, mostly from the early logging and homesteading that took place on the Santiam State Forest. Cultural resources are defined as any human-created sites, structures, or objects that are of historical significance to the local area, region, state, or nation, in providing information and education of ethnic, religious, or social groups, activities, or places.

It is the Policy of the Oregon Department of Forestry, State Forests Division, to preserve and protect archaeological and cultural resources and sites during forest management activities according to state law. In order to protect any potential cultural resources during restoration activities, the area inside the fire perimeter was reviewed by an archaeologist from Oregon Department of Transportation. Areas where cultural resources may be present will receive further review and avoidance measures where appropriate.

### ***Aquatic Habitat Restoration***

Appendix J of the NWFMP establishes the standards for riparian management areas (RMAs) of the various stream types in the Santiam State Forest. The strategies are designed to maintain and protect healthy streamside buffers. Many of these riparian forest stands have been burned over or heavily damaged. Table 7 below shows the burn severity along the 174 miles of streams within the fire perimeter.

**Table 7. Burn Severity along streams**

Stream Type	Unburned Miles	Low Severity Miles	High Severity Miles	Total Miles	% of Total
Fish	5	9	20	34	20%
Nonfish	26	30	54	110	63%
Unknown Fish Presence	1	2	27	30	17%
<b>Grand Total</b>	<b>32</b>	<b>41</b>	<b>101</b>	<b>174</b>	<b>100%</b>

All salvage harvest operations will continue to use the NWFMP RMA buffers. If there are circumstances that require alternative management that would accelerate the development of mature forest condition or is required for public safety, a plan for alternative management shall be completed and approved by the staff aquatic specialist. Restoration activities that may take place over the next few years include:

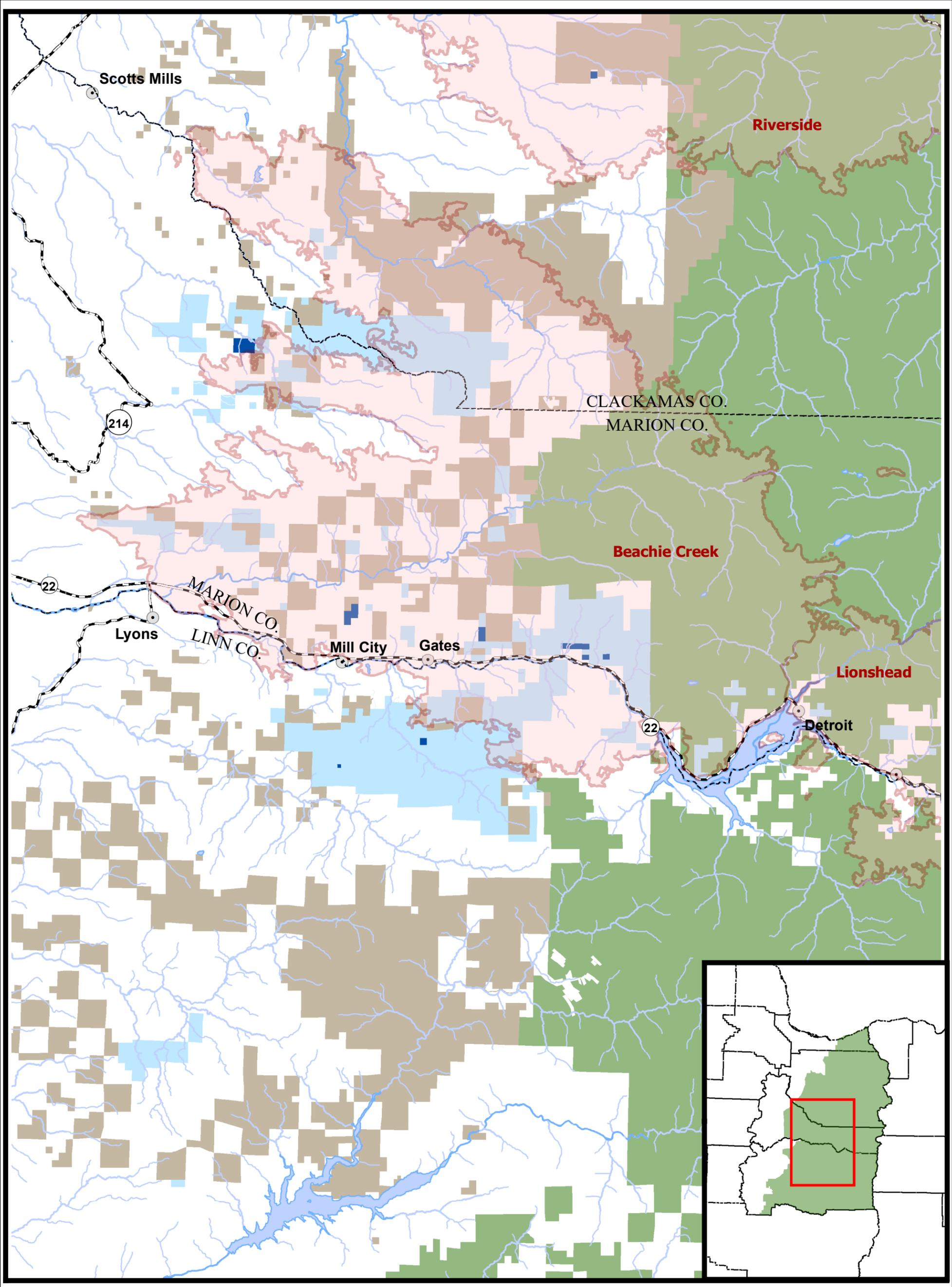
- Targeted instream restoration in conjunction with ODFW & local Watershed Councils in identified high priority watersheds
- Replace damaged drainage culverts and fish stream culverts
- Vacate legacy roads near streams
- Opportunistic large wood placement in conjunction with salvage operations where feasible
- Planting heavily burned RMAs where it can be done safely and if seedlings appropriate for riparian sites are available

## Monitoring and Adaptive Management

Even though an initial assessment post-fire has been mostly completed, conditions could change drastically over the next couple of years. Monitoring will show how the forest is responding to salvage, reforestation and other restoration activities and show where management strategies might need to be adjusted. Also, new research might become available that shows alternative treatments to apply in the burned area. Monitoring will be established to better understand the efficacy of restoration options. Specifically, monitoring will address:

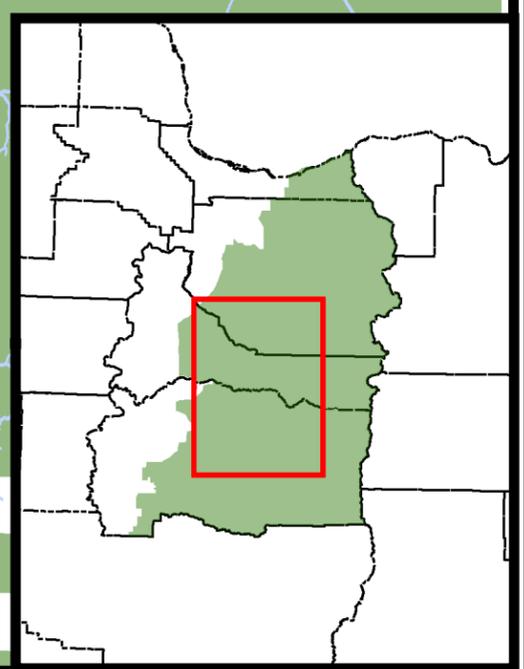
- Short and long term levels of green tree retention, snags and large downed wood associated with different salvage prescriptions
- Large wood recruitment over time in stands with and without salvage
- Success of natural regeneration and various active reforestation techniques, including variable planting density, aerial seeding and interplanting in stands with a significant standing dead tree component, in both upland and riparian areas
- Continue monitoring of Northern Spotted Owl activity using existing survey protocols inside and outside the fire perimeter
- Monitor Oregon Slender Salamander study to monitor the rates of occupancy after the fire with different salvage prescriptions, using existing survey protocol
- Outreach to other agencies, and landowners to participate in for research or monitoring activities activity on a broader scale across, where there are implications across landownership and management strategies

# North Cascade District Ownership



- Ownership**
- Board of Forestry Lands
  - Common School Lands
  - US Bureau of Land Management
  - US Forest Service
  - Fire Perimeter

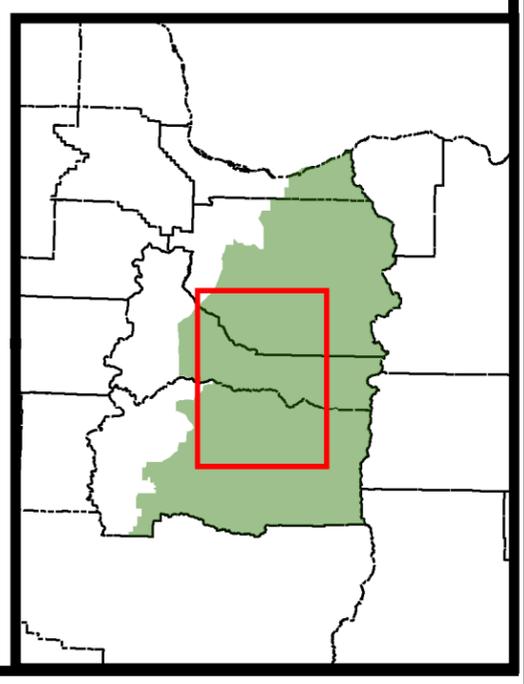
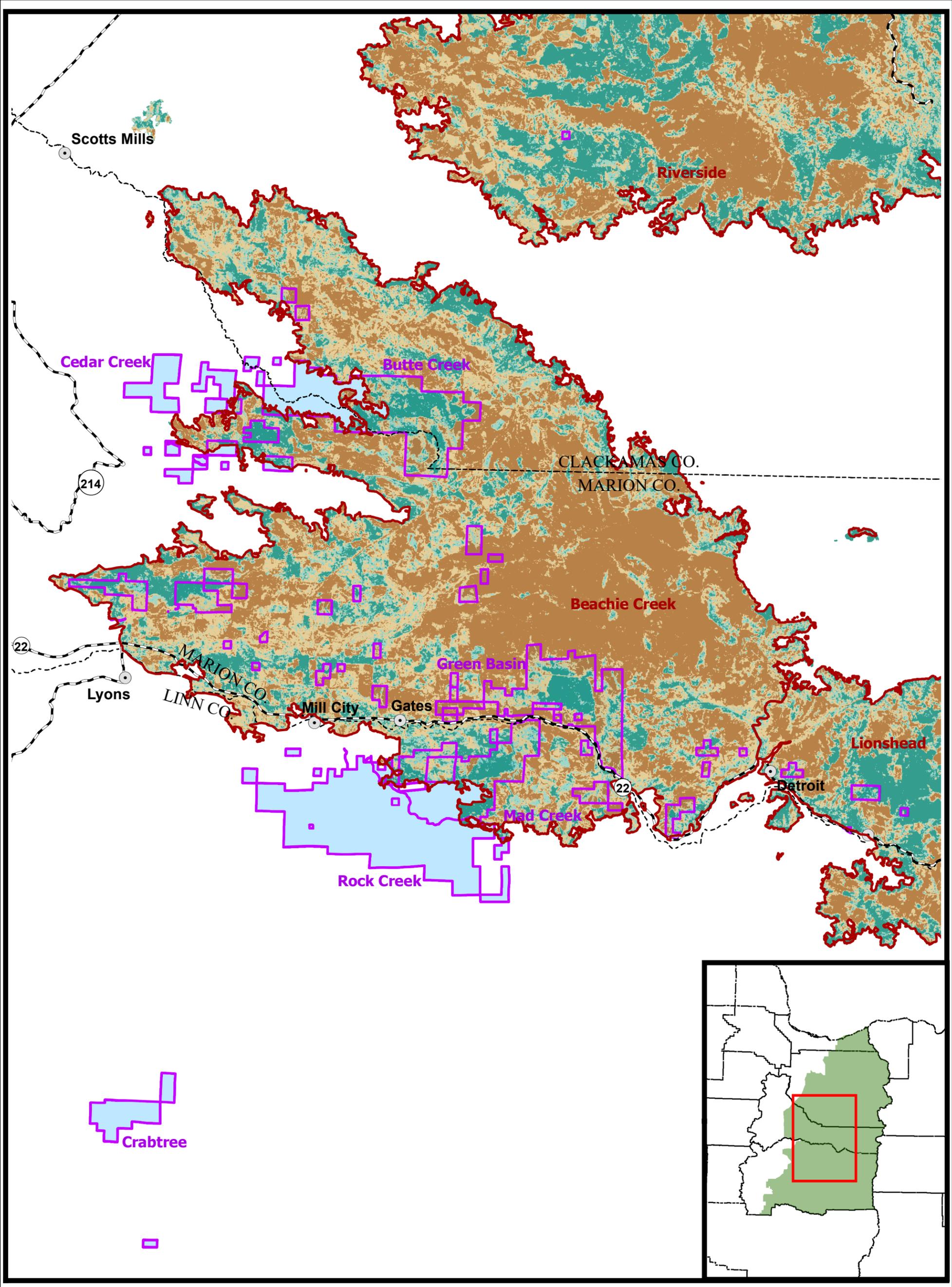
- **Towns**
- **Roads**
- **Streams, Large**
- **Streams, Medium**



This product is for informational purposes, and may not be suitable for legal, engineering or surveying purposes. This information or data is provided with the understanding that conclusions drawn from such information are the responsibility of the user.

ODF 11/17/2020

# North Cascade District Burn Severity Map



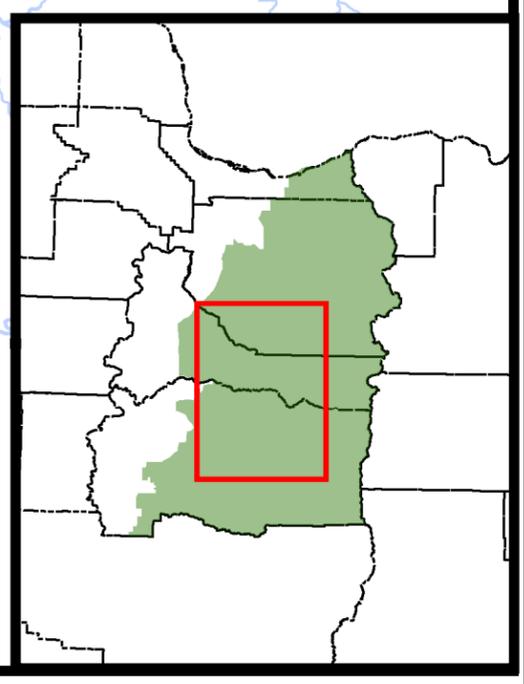
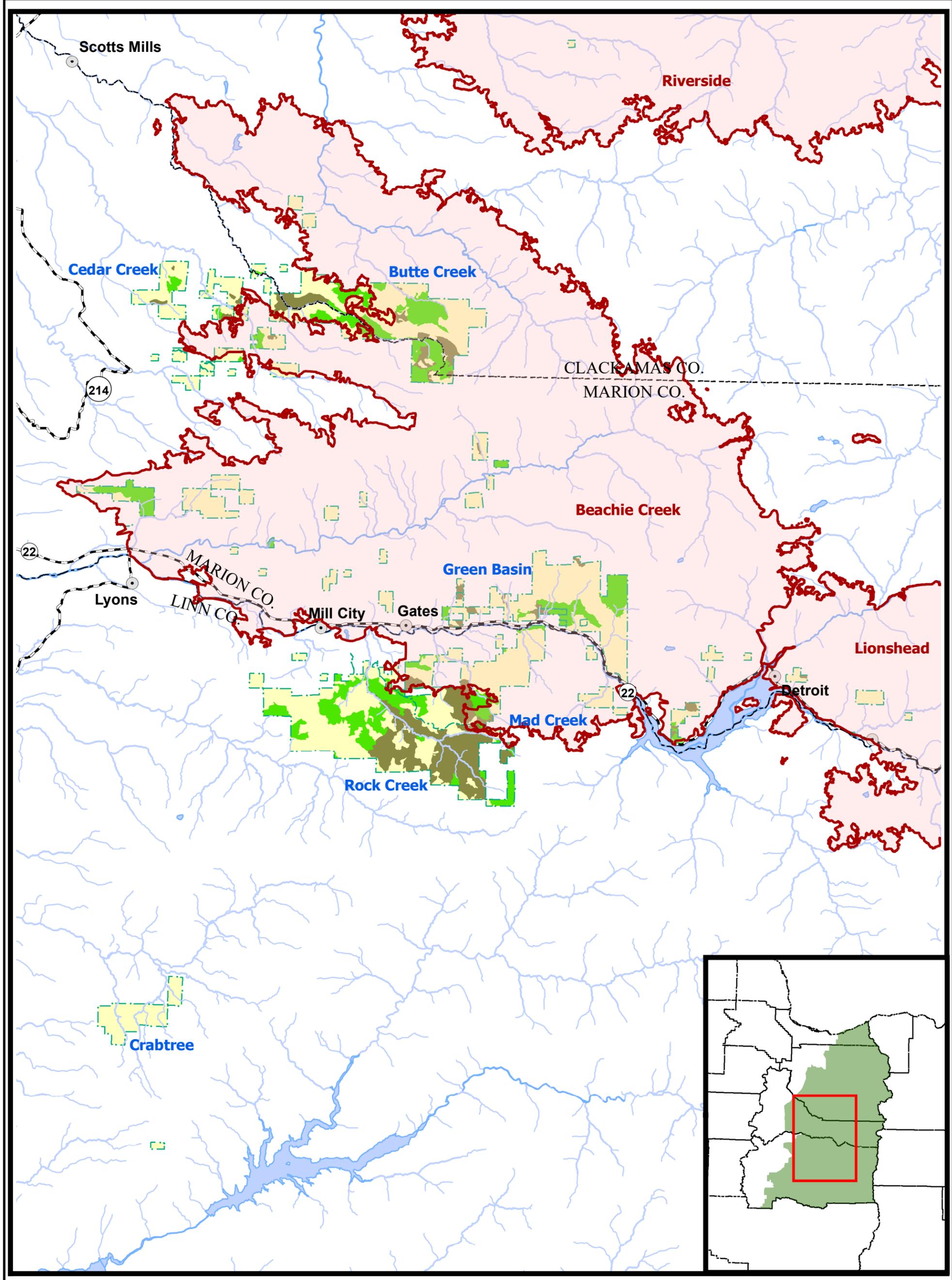
-  Towns
-  Roads
-  County
-  Fire Perimeters
-  ODF Managed Lands
-  Unburned
-  Low Severity
-  Moderate Severity
-  High Severity



This product is for informational purposes, and may not be suitable for legal, engineering or surveying purposes. This information or data is provided with the understanding that conclusions drawn from such information are the responsibility of the user.

ODF 1/13/2021

# North Cascade District Desired Future Condition



- Towns
- Roads
- Streams, Large
- Streams, Medium
- ▭ Management Basins
- ▭ Fire Perimeters
- ▭ Layered
- ▭ Older Forest Structure
- ▭ Other



This product is for informational purposes, and may not be suitable for legal, engineering or surveying purposes. This information or data is provided with the understanding that conclusions drawn from such information are the responsibility of the user.  
ODF 11/17/2020

# Public Comment Summary

## FY 21 North Cascade Implementation Plan Major Modification

The following is a summary of comments raised by the public and stakeholders related to the draft revised Fiscal Year 2021 Implementation Plan for the ODF North Cascade District, home to the Santiam State Forest. Major modifications to district Implementation Plans require a 30-day comment period, which opened on November 23, 2020. A 15-day extension was granted to allow additional time to review and provide comment.

The public was notified via two statewide news releases and subsequent media coverage, 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. A virtual public forum was held on December 8, 2020. The State Forests Division gave a presentation to the Marion County Commission and have extended offers to the Linn and Clackamas county commissions.

In all, ODF received 1,155 written comments related to the Implementation Plan revision and/or Santiam State Forest restoration generally, including 1,091 from organizational email campaigns. The Oregon Department of Fish and Wildlife and Department of Environmental Quality also submitted comments.

The following is a synopsis of key themes by topic:

## Salvage logging

The bulk of comments received pertained to salvage logging. Themes of comments in support of current or increasing salvage harvesting levels included:

- Numerous comments encouraged capturing value from destroyed trees while they are still merchantable
- Generating revenue to support public services for rural communities impacted by 2020 wildfires and to fund forest restoration.
- Increasing the pace of assessment and amount of salvage logging.
- Retaining carbon in wood products and carbon absorption from young trees
- A number of commenters cited the Tillamook Burn and subsequent recovery as a positive example of active reforestation.
- At the public forum, one participant questioned why ODF considered trees 18-40 years old not to be merchantable.

Themes of comments in opposition to or concerns with salvage logging included:

- Salvage logging disturbs the natural reforestation process, particularly development of early complex seral forests
- Numerous comments referenced climate change as a reason to restrain or avoid salvage harvest, with associated carbon emissions and lost potential for carbon storage in naturally

recovering forests, and how these operations interact with Governor Brown's Executive Order 20-04.

- Concern regarding soil erosion and silt in waterways.
- Green trees that survived the fire could be harvested along with dead trees or those unlikely to survive.
- Some expressed opposition to any logging in areas that were considered Older Forest Condition or Layered prior to the fires.

Other comments included:

- Concern that standing dead trees could increase future fire danger. Others contended slash fuel from salvage logging presented a greater future fire danger.
- Preserving water quality was cited both as a reason to replant quickly as well as leaving areas alone for natural reforestation.
- Strong disagreement between environmental and industry groups on how elements of the draft Western Oregon State Forests Habitat Conservation Plan should, or should not, be incorporated into the draft Implementation Plan.
- Increased riparian protections beyond the Northwest Oregon State Forest Management Plan minimums.
- Requests for on-the-ground access, photos or maps of individual sales, both now and in future Annual Operations Plans.
- Keeping bid prices low and not "playing the market" with salvage sales.
- A request for public and Board of Forestry involvement in dispensation of any revenue surge to the State Forests Division.
- Hunting groups requested that the implementation plan include early seral habitat for game and non-game terrestrial wildlife, including meadows and open/non-closed canopy forest.
- Encouraging ODF to consider interplay between planned green timber sales on state land as well as private salvage logging operations when evaluating impact to waterways.
- One commenter noted the financial health of the State Forests Division and Forest Trust Land counties should not be considered in Santiam restoration plans.
- A request to extend of the public comment period, which was granted.
- One commenter requested that historic or culturally significant sites receive priority in restoration.

## Recreation and access

Comments ranged from access concerns to ideas for recreation post-fire and requests for a collaborative effort in restoring some of the damaged recreation areas.

- Access concerns were primarily centered on unburned areas in the Santiam, including residents of the Santiam Canyon who wish to recreate near home. Mental and physical health benefits were cited by several commenters.
- One respondent was concerned about mountain bikers encroaching on equestrian trails.
- One person requested that contract holders for salvage logging sales to set some logs aside for public firewood cutting.

- Several commenters encouraged increased mountain biking opportunities and noted potential for economic benefit to nearby communities.
- DEQ comments noted opportunity for interpretive and educational signage in various areas explaining decisions to replant/not replant, particularly in riparian areas.
- Public safety along roads and in popular recreation areas was identified as a priority for some commenters.
- Two commenters offered volunteer services to help expedite the re-opening process.

## Forest management

Themes on forest management included:

- Encouraging ODF to thin some forest areas and avoid establishing overstocked, single-species stands.
- Some questioned why ODF was adhering to riparian buffer standards outlined in the Northwest Oregon Forest Management Plan rather than the larger buffers within the draft Western Oregon Habitat Conservation Plan.
- Consider revisiting whether to leave wider-than-required riparian buffers, instead assessing based on individual site conditions.
- One person expressed concern that proposed Riparian Management Areas under the HCP were designated for natural regeneration rather than replanting, and that this could slow recovery.
- ODFW requested recognition of biological legacies when planning for salvage harvest and recovery, including more snags in areas where there are not enough green trees
- Bark beetle infestation affecting live trees in or near affected areas was cited as a reason to move forward with removing dead trees from the landscape.
- One commenter encouraged ODF to capture site prep costs in salvage logging contracts to ensure equitable distribution of costs between Forest Trust Land counties and the state.
- Across the ideological spectrum, commenters encouraged more monitoring and reporting and more details on stand condition, burn severity, and proposed sales. ODFW also expressed these concerns.
- Another asked what metrics ODF was using to determine which trees are likely to survive and thus designated as leave trees.

## Replanting

Themes on replanting included:

- Consider fire and disease resistance when choosing species mix
- Comments from DEQ requested more detail on how replanting would occur and stating desired future condition of these areas.
- Active reforestation to avoid competing vegetation overwhelming potential trees, impeding the reforestation process.
- ODFW requested that the agency consider hardwood and shrubs, particularly along riparian corridors.
- Encouraging little to no active replanting, allowing natural regeneration to take place over time.

- One respondent asked that ODF consider permanent wet and dry meadows as part of its restoration strategy due to benefits to game animals and pollinator insects.
- Another asked that ODF avoid planting grass, and choose clover as an alternative.
- Site-specific planting prescriptions were encouraged.
- One commenter suggested enlisting home-insecure individuals to replant and perform other restoration efforts.

## Roads

Most comments regarding roads were applicable to forest management generally and not specific to post-fire restoration operations. Themes included:

- Impact of roads generally concerning runoff into streams
- One commenter requested that proposed road decommissioning be presented for public comment, noting that roads provide access for recreation as well as forest management.
- Another asked that all roads in older forest areas be abandoned.
- Specific to post-fire management, DEQ noted possibility of future culvert failures beyond those already counted due to heat changes to polymer chemistry in plastic culverts.
- ODFW stated it “could not determine” whether some culverts were on fish-bearing streams, and noted these crossings could trigger fish passage laws requiring ODFW approval.

## Wildlife

Themes on wildlife included:

- A number of commenters requested more details and/or avoiding any salvage harvests within Northern Spotted Owl circles impacted by the fire.
- Positive effects for certain wildlife in burned areas.
- DEQ comments included requesting donated downed wood for stream restoration and retaining wood on hillslopes, high landslide hazard locations, and small non-fish bearing streams beyond FMP requirements.
- ODFW provided detailed comments, including:
  - o Consideration of potential influences on fish and wildlife habitats and maintenance of ecosystem processes
  - o More clarity and detail, with additional cross-agency partnership opportunities
  - o The relationship between Santiam restoration and current forest management planning processes
  - o Restoration within proposed Riparian Management Areas for beaver
  - o Strategic restrictions to motorized vehicle access to reduce elk and deer disturbance
- One respondent noted the draft Implementation Plan refers to consulting with ODFW on aquatic wildlife matters, and noted the same consultation should take place regarding terrestrial wildlife habitat restoration.
- Ospreys were cited by two commenters as a priority.

## **Funding and reimbursement**

- One respondent were interested in how the restoration process will be funded, and what priorities could be offset as a result.
- Another respondent said the federal government should pay for all of ODF's restoration costs because the U.S. Forest Service managed the Beachie Creek Fire, which in turn caused most of the damage to the Santiam State Forest.

## **Fire prevention**

- One person stated that motorized vehicles should be banned from state forests due to fire risk, and that all powerlines should be buried or made storm-proof.