



Associated Oregon Loggers, Inc.

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"Voice of small family forest businesses since 1969"

April 6, 2021

Peter Daugherty
Oregon State Forester
2600 State Street, Building C
Salem, OR 97310

In Response to Action Item: North Cascade District 2021 Annual Revised Operations Plan

Dear Mr. Daugherty,

Introduction

Associated Oregon Loggers (AOL) is a local trade association which represents nearly 1,000, family-owned forest contracting businesses. Our members have been involved in the management of the Santiam State Forest for decades. Our members are essential to conduct any activity in the woods, be that road work for access, timber falling for management and restoration, reforestation for sustainability, trucking for product transportation, and many other services. AOL's members provide a diverse array of services that are necessary for Oregon Department of Forestry (ODF) to conduct successful post-fire restoration in the proposed North Cascade District 2021 Annual Revised Operations Plan (AOP). The best way to ensure economic viability and operational feasibility of salvage and restoration operations is to work with AOL, your partner in the forest contracting sector.

These honorable small businesses, led by forestry professionals, employ more than 22,000 Oregonians who provide sustainable, state of the art, forest management services for Oregon's public and private forestlands, while producing economic stability for their communities and living wage jobs for their employees and families.

Our Perspective

First, AOL wants to thank ODF for considering a revision to their AOP and the work that has already been completed in restoring the Santiam State Forest. ODF has already sold seven of the eleven sales outlined in the Revised AOP because of the need to treat the landscape as quickly as possible. When it comes to post-fire restoration, timeliness is a key factor for success. Secondary pests and disease that degrade the value of the timber quickly move in and create uneconomic operations that reduce opportunities for restoration activities.

The Forest Management Plan allows flexibility for post-fire management and does not preclude quick action from being taken to restore the landscape. This type of quick action is standard procedure for ODF after a catastrophic event.

We recognize the difficult task ahead and applaud the state employees working tirelessly to ensure Oregon's state lands remain forested through their post-fire restoration efforts. Without the work presented in the Revised AOP and the preceding Revised Implementation Plan (IP), it is likely the Santiam State Forest would take decades if not longer to regenerate. This would mean significant time lost, leaving animals without habitat, timber dependent communities without jobs, and Oregon with a large carbon source rather than a carbon sink.

Small generational businesses are intertwined as an essential weave in the fabric of Oregon's nation-leading forest sector. Nearly all Oregon forestland management is conducted by small family forest businesses. **When a tree seedling is planted, a forest restored, a tree thinned, a log harvested, a forest road maintained, or a forest fire fought—this management is done by a small family forest business.**

The work outlined in the Revised AOP will help to support these small family forest businesses, their families, and their communities.

Operations

AOL believes the methods presented in the Revised AOP will lead to meaningful restoration on the ground utilizing operationally feasible methods.

AOL supports the retention of green trees wherever operationally feasible that have:

- 1) more than 20% live green crowns,
- 2) less than half of their exposed roots scorched, or
- 3) less than two panels where the fire penetrated through the bark and bole of the trees.

We appreciate the included language about roadside hazards and safety concerns for operators. As ODF is aware, our members put themselves at risk every day in the woods and allowing additional safety measure to be taken by removing hazardous trees increases safety on the ground. Safety is non-negotiable and should be prioritized as the Revised AOP outlines.

Treatment Areas

Although AOL is supportive of the strategy for treatment on the landscape, we believe the scale of management should have been increased in order to maximize restoration capacity. Of particular concern is the lack of treatment in the riparian management areas (RMAs), aquatic anchor sites (AASs) and terrestrial anchor sites (TASs).

As AOL explained in our comments to the IP revision, "Rather than continuing to use the Forest Management Plan RMA buffers, AOL believes that ODF should assess and prioritize each situation individually. Let your foresters make individual situations based on risks and needs they see. It is known that RMAs within high severity burns will take more time than we have to reestablish."

The Erosion Threat Assessment and Reduction Team Report even went as far as to request wider-than-required buffers should be utilized across the landscape. AOL believes restoring these areas should be prioritized for treatment rather than left alone and buffered out of units.

It is AOL's understanding that the AAs and TASs were developed in 2012 in the IP as *extra* set-asides.

Similar to the arguments for treatment in the RMAs, treatment in the 1903 acres of moderate to high severity burn within the Sardine Creek AA would create increased opportunities for shade development and slope stabilization among other benefits. We understand that areal seeding has already begun, but completing salvage operations within it that are outside of stream buffers, would increase the restoration timeline for this AA.

In the 2020 article by Ryan Niemeyer, Kevin Bladon and Richard Woodsmith titled [Long-term hydrologic recovery after wildfire and post-fire forest management in the interior Pacific Northwest](#), the researchers found after the Entiat Experimental Forest fire that, "Considering the suggestive evidence (presented earlier in Section 3) that annual discharge and the runoff ratios in Fox Creek remained greater during the post-long period compared to the pre-fire period, overall this is indicative that streamflow remained slightly elevated 35–41 years after the fire in this unmanaged catchment. Alternatively, the collective evidence suggests that the two catchments that were actively managed after the fire (salvage logged and

seeded) had fully recovered during the long-term period of the study.” This research suggests that post-fire logging is actually beneficial for aquatic systems.

Related to TASs, the Revised IP states that, “Any proposed future management within the forested portions of the TAS will promote development of mature forest conditions and will emphasize protection of existing high elevation lakes, wetland, and talus slopes.” We would argue that leaving these areas void of post-fire restoration treatments actually slows the development of mature forest conditions and the Rhody Lake TAS would actually benefit from management in the 893 acres of moderate to high severity burn areas.

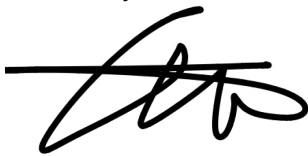
AOL believes reforestation and restoring all areas that are economically and operationally feasible in the Santiam State Forest should be prioritized. When completed promptly, the process will stabilize soils, protect water supplies, provide habitat to wildlife, and ensure a future generation of healthy trees providing [climate solutions](#).

Conclusion

Overall, AOL is supportive of the Revised AOP. We thank you for utilizing the flexibility in the FMP to implement post-fire restoration activities quickly and appreciate the additional information provided in the Revised AOP. Please consider the points made above for increasing management or, at least, achieving the management currently prescribed.

Thank you for prioritizing this critical work. We hope ODF takes our comments presented here seriously and reaches out to AOL with any questions regarding what you have read.

Graciously,



Amanda Astor (she/her/hers)
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Sources

Ganguly I, Pierobon F, Sonne Hall E. Global Warming Mitigating Role of Wood Products from Washington State’s Private Forests. *Forests*. 2020; 11(2):194. <https://doi.org/10.3390/f11020194>

Niemeyer, R. J., Bladon, K. D., & Woodsmith, R. D. (2020). Long-term hydrologic recovery after wildfire and post-fire forest management in the interior Pacific Northwest. *Hydrological Processes*, 34(5), 1182-1197. doi:10.1002/hyp.13665

From: [Nancy Armstrong](#)
To: [SFCOMMENTS.ODF * ODF](#)
Subject: comment on Santiam State Forest harvest of wildfire burn
Date: Tuesday, April 06, 2021 4:39:28 PM

As many have already said: 'allowing' comments when the plan is already halfway implemented reinforces that Oregon doesn't really care what the people think. But I'll add my two cents worth anyhow.

Here we go again with the loud new-comers getting more attention than they warrant. Oregon has a lot of forests, a lot of public land. There is ample space to 'recreate' AROUND the forests devastated by wildfire last year. Bowing to their noise helped create the situation that led to those wildfires. Trees do NOT live forever. They get old, sick, and rotten. At that point they aren't even worth cutting; they're just match sticks waiting to be torched. Environmentalists want a "natural" fairy-land. There's no such thing. Had we been logging to sustainability levels, there would have been much less sick trees and ground debris to burn, there would have been logging roads for the firemen to use and areas of replantings.

What's equally maddening is that the state of Oregon doesn't want anyone to make a living by logging. Apparently they want everyone to work for the government, little realizing that with no tax payers there IS NO government. That's the rub: we pay their salaries and they ignore us. I very much resent that.

The ENTIRE 1.5 million burned acres (statewide) should be salvage logged. Let the recreational environmentalists recreate in other, new, and equally beautiful spots. Let them spend their \$1.99 in new places, while families make an honest living.

Nancy Armstrong
[REDACTED]
Oregon City, OR 97045

[REDACTED]

From: oregon-gov-web-services@egov.com
To: [SFCOMMENTS ODF * ODF](#)
Subject: State forests public comment
Date: Sunday, March 28, 2021 10:57:12 AM
Attachments: [formsubmission.csv](#)

Name	Eric Bufka
Email	[REDACTED]
Phone	[REDACTED]
Subject	North Cascade District FY2021 Annual Operations Plan
Comments	Please thin the forests to make them more resilient to wild fires that were seeing more and more of every summer. We need the logging but also need the replanting to reduce our carbon footprint. That way the next generation can enjoy Oregon's beautiful forest too. It takes all kinds of forest management to keep Oregon green

Submission ID: 82e356ed-687e-4874-bd40-0c365ea15163

Record ID: 373



April 6, 2021

Oregon Board of Forestry
Oregon Department of Forestry
2600 State Street
Salem, Oregon 97310

Re: Annual Operations Plan Comments; Santiam State Forest

Dear Chair Imeson, Board Members, and State Forester Daugherty,

Thank you for this opportunity to comment on the post-fire logging operations planned within the Santiam State Forest. To summarize our concerns, our organizations want to make clear that we believe the proposed logging operations within this Annual Operations Plan are in part illegal, and we are preparing to challenge this proposal. We believe the Department has no justification for the post-fire logging of designated complex forest areas and that this is a violation of this Board's Forest Management Plan. We have requested that the Department drop the logging of these complex areas, and also that the Department drop the logging of the reserve areas under its new Habitat Conservation Plan currently undergoing federal approval. Our organizations were in discussions with the Department to resolve these differences outside of the court room and arrive at a middle ground, but these discussions were recently terminated by the Department.

At the outset, we wanted to address the point made by the Department that has caused confusion and push back from logging industry representatives: that the Department is only planning post-fire logging on 18% of the 16,600 burned acres. This figure is misleading.

The Department's post-fire surveys of the Forest determined that while approximately 24,700 acres, or just over half of the Forest, was within the fire perimeter, only about 16,600 acres were impacted by the fires. The Department assessed approximately 14,000 of these acres for post-fire logging "because the remaining acres are mostly in the low burn severity class and many are located within scattered ownership blocks." Of these 14,000 acres, the Department determined that 5,400 acres were unable to be logged because there were "operability issues, low volume, low value, high landslide hazard locations, non-forest, administrative sites, etc.," 5,100 acres were young plantations that burned so intensely that logging was not an option, and the Department is proposing to log the remaining 3,500 acres. The Department is proposing to post-fire log every acre that is feasible for them to log. The representation that only 18% is going to be logged has caused confusion and is disingenuous.

This amount of logging will roughly triple the annual allowable logging on the Santiam State Forest dictated by the Board of Forestry. This is a volume grab on an enormous scale that will have serious environmental consequences. It is also illegal.

The State Forester's planned logging operations plainly violate the Forest Management Plan ("FMP") adopted by this Board in 2010. First, the Annual Operations Plan contemplates the regeneration harvest of areas with a "Desired Future Condition" designation of "Layered" and "Older Forest Structure," which the AOP refers to cumulatively as "complex." The regeneration harvest of these complex forests is neither designed nor necessary to reach the Desired Future Condition. This is a violation of the FMP. The FMP requires that any management activities proposed in these designations be "necessary to move toward the desired future condition."

Both ODFW and DEQ raised concerns that the logging of these complex areas would remove snags and downed wood from these areas and set back these areas from their attainment of the desired future condition. Our organizations also presented the Department with extensive science that has been conducted on post-fire logging (much of it in Oregon), which again reiterates that post-fire logging hinders the development of complex forest conditions. The FMP even states that the logging contemplated in older forest areas is designed to mimic disturbances like fires.

We would ask the Board to have the Department's technical experts weigh in on this issue. The science articulates singularly that the commercial logging of post-fire forests will hinder these areas' development into complex forests. This is simply not permitted under the FMP. As a group of respected researchers discussed in the authoritative journal *Science*:

[N]atural disturbances are key ecosystem processes rather than ecological disasters that require human repair. Recent ecological paradigms emphasize the dynamic, nonequilibrium nature of ecological systems in which disturbance is a normal feature and how natural disturbance regimes and the maintenance of biodiversity and productivity are interrelated Salvage harvesting activities undermine many of the ecosystem benefits of major disturbances. . . . [R]emoval of large quantities of biological legacies can have negative impacts on many taxa. For example, salvage harvesting removes critical habitat for species, such as cavity-nesting mammals, [and] woodpeckers, . . . Large-scale salvage harvesting is often begun soon after a wildfire, when resource managers make decisions rapidly, with long lasting ecological consequences. . . . (Lindenmayer et al. 2004.)¹

Accordingly, we would ask the Board to order the Department to drop all salvage logging in complex forest (including Layered and Older Forest Structure stands as designated in the AOP). Salvage logging in complex forests is counterproductive to current and future condition goals of increasing forest complexity. In Layered and Older Forest Structure stands, regardless of the present vegetative components, salvage harvest effectively restarts the natural processes that

¹ Lindenmayer, Franklin, Hunter, Noss, et al., 2004. ECOLOGY: Salvage Harvesting Policies After Natural Disturbance, *Science* 303: 1303. http://www.eebweb.arizona.edu/courses/ecol406r_506r/lindenmayer&noss-2005-effectslogging4.pdf

have occurred in those stands over time, which is contrary to their Layered and/or Older Forest Structure designations. The idea that “thoughtful consideration” can be given to harvesting an area designated for Layered and Older Forest structure is oxymoronic—to achieve maturity and complexity based future condition goals, Layered and Older Forest Structure stands cannot be harvested.

Likewise, the agency is currently soliciting scoping comments on a proposed Habitat Conservation Plan (HCP). A critical component of this plan are the reserves, referred to as Habitat Conservation Areas. The Department is proposing to log 677 acres of these reserve areas, while it is in the process of finalizing a plan to protect these areas. We believe it is inappropriate for the Department to log these areas and completely reset their development, while proclaiming in the HCP that these areas will satisfy the Department’s older forest goals. We request that the Board instruct the agency to drop these 677 acres from post-fire logging.

The burning of state forest lands in the 2020 wildfires is a scientifically inadequate justification for changing the treatment of complex forests. Forest management must be based in the best available science regarding post-fire recovery. For the sake of our communities and Oregon citizens, this requires a thorough examination of the decisionmaking during restoration efforts. Wildfire is a natural process that leaves behind a variety of critical features for forest health including snags and down wood debris. Those features are actually contemplated by the Forest Management Plan itself as features of complex forest. Not only does post-fire logging remove those ecological habitat values, but it actively degrades the forest across multiple forest health indicators including soil health, water quality, and forest recovery, all of which are explicitly part of the administrative rules that define greatest permanent value.

In addition to the elements of forest stand diversity and maturity, the physical, structural components of complex stands render them ecologically diverse. In line with the best available science, such stands should not be harvested. Downed wood and debris on the forest floor, as well as standing snags are prominent habitat features highlighted by the FMP. Downed wood is an integral feature of complex forests, providing habitat for wildlife and a biological legacy following catastrophic forest events. Similarly, standing snags provide habitat and promotes biodiversity. Removal of these structures from complex forest following a fire is not a scientifically sound strategy to achieve the long-term complexity targets in the forest management plan. Regeneration harvest simply has no biological justification in these burned areas where future condition goals are predicated in part on the amount of downed wood and snags, elements that will be targeted for removal by salvage logging.

Setting aside a small percentage of Oregon’s state forests to allow time for it to mature is a legally necessary component of securing the greatest permanent value for Oregon forests. This legal obligation—to secure the greatest permanent value—is found in the Oregon statute and fleshed out through administrative rule. The rule defining greatest permanent value is multifaceted, and includes provisions requiring the State Forester to protect soil, air, and water, protect and maintain wildlife habitats, and implement management practices that integrate and achieve a variety of forest resource management goals. OAR 635-035-0020(2). Additionally, the rule requires the State Forester to achieve site-specific goals over time as set forth in the Forest Management Plan. OAR 635-035-0030(3). This Board approved such a Forest Management Plan in 2010, and in doing so, determined that the balance achieved in that plan (between timber harvest, habitat conservation, and water protection) secured the greatest permanent value for

Oregonians. The State Forester is required to implement the Forest Management Plan through smaller scale implementation plans. These plans must be consistent with the Forest Management Plan. OAR 635-035-0030(6). Under the revised Implementation Plan, the current revised AOP will not achieve the greatest permanent value by conducting salvage harvest operations in areas that were set aside to become complex forest.

While the Department proposes a multifaceted approach to managing the Forest overall in response to post-fire conditions, to allow regeneration harvest in areas designated as complex forest, and in areas with the most ecological progress in achieving layered and old forest structural features, would be a mistake. To harvest these complex stands in the way the revised Implementation Plan and current AOP prescribes is counterintuitive, and inconsistent with the law. Pursuant to the FMP, regeneration harvest is only allowed in these complex designations if the stands have poor potential for growth or development into layered or older forest structure types. The opposite is true here.

The remaining green trees have been given room to grow, and these surviving trees will compose a dominant overstory canopy over newly developing early-seral habitat and a developing understory. These are ideal conditions for the development of complex forest. The Department does not even attempt to argue in the revised implementation plan that regeneration harvest in these complex areas is needed in any capacity. This argument is not found in the plan because there simply is no biological or scientific justification for these harvest prescriptions. The fire itself was already a factor in advancing the complexity of these forest stands, and this AOP does not consider this key feature with its harvest prescriptions.

Regeneration harvest will reset the development and evolution of these forests. From a legal standpoint, harvesting complex as described in the AOP would also be plainly contrary to the Department's own management objectives, the Forest Management Plans, and therefore inconsistent with Oregon's administrative rules. For these reasons, we urge the Board to instruct the Department to hold off on any further auction and sale of these post-fire timber sales until the agency removes from consideration designated complex forests and the Habitat Conservation Areas under the new Habitat Conservation Plan. We understand that the Department needs to recoup some financial value from these forests to finance the restoration work to be done on the Santiam. However, the Department needs to honor its prior commitments through this process. The Department is attempting to dramatically increase planned timber harvest on the Santiam for the next three years, and we believe our proposed reductions are incredibly reasonable in the face of this drastic increase.

Please feel free to reach out with any questions.

Sincerely,

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COX Jason R * ODF

From: Chris Clarke <[REDACTED]>
Sent: Saturday, April 03, 2021 8:42 AM
To: SFCOMMENTS ODF * ODF
Subject: Santiam Forest Logging Plan

Follow Up Flag: Follow up
Flag Status: Flagged

To Our Trusted Officials:

Please be sure to be cautious when allowing Private Logging Concerns to harvest our forest land. Yes, it makes sense to remove trees which pose a risk to life & property; however, REMOVAL OF OUR TREES MUST BE CLOSELY MONITORED!

Thank you for your important work.

Chris Clarke
[REDACTED], Salem, OR 97302

COX Jason R * ODF

From: Paula Clarke [REDACTED]
Sent: Monday, April 05, 2021 1:21 PM
To: SFCOMMENTS ODF * ODF
Subject: Santiam Forest logging plan

Dear ODF Official,

I have been following this issue for some time, and have great concern re the aggressiveness of the logging portion of the plan.

Outdated Logging interests seem to be given more weight despite new scientific evidence demonstrating clear cutting , over logging of forest, and plantation style farms is short sighted.

It makes sense to cut hazardous trees near highways, cities and homes. Otherwise, the forest should be allowed to regenerate naturally .

Theses forest belong to the people, not the lumber industry which cannot be trusted and often acts in bad faith. A most recent example of this is the cutting of viable trees in the burnt areas.

Please represent the interests of the public now and for future generations.

Sincerely,
Paula Clarke
[REDACTED]
Salem, OR 97302
[REDACTED]

Sent from my iPhone

From: [REDACTED]
To: [SECOMMENTS ODF * ODF](#)
Subject: Post fire logging
Date: Monday, April 05, 2021 11:49:38 AM

I would just like to comment on the trees in the Detroit area which were burned in the fire last year. I am a Oregon resident and I have lived here for all my life, 80 years. I would just like to say that for years we have lived through the Tillamook burn as well as the fires in Eastern Oregon.

I believe that the trees should be removed that have been burned and new ones planted. I have hated driving through the burned forest for years on the way to Baker City as well as around Tillamook. I think that if we can recover anything from those trees that were burned it should be done. But the burned trees distract from the Oregon beauty of the green forest. Yes, it will take time for the new trees to grow. However, it also takes time for the old ones to rot, and I am sure that is not good for the animals as well.

Thank You

Constance Doherty

From: [Bob Elliott](#)
To: [SFCOMMENTS ODF * ODF](#)
Subject: Cut them
Date: Saturday, April 03, 2021 9:28:09 PM

You all know better than left leaning environmental nuts. Those trees will rot in place and fall on someone someday. Cut them all and replant. Bob Elliott

Sent from my iPhone

Summary of Timber Harvest by Basin with Pre-fire Complex Forest Stands *

BASIN	Subunit	STATUS	Table 5 Net Acres		Text Net Acres		DESIGNATED FUTURE COMPLEX FOREST LYR	Northern Spotted Owl OFS	COMMENT
			Partial Cut	Modified Clearcut	Partial cut*	Modified Clearcut			
Butte Creek			570	727					
	Butte Creek Contingency	SOLD				4			Cut during fire
	Family Camp	PLANNED			0	59			Sale not in Landscape design future complex forest
	Gawley Panther	PLANNED			570	664	37	40	5 of 12 units BA Assessment to be prepared EXCEPT where roadside hazard trees to be cut!
Cedar Creek		SOLD-- GREEN	101	1					Thin 36-year old Douglas fir, not burned; sold before fire
Crabtree			0	0					No sales planned
Green			300	673					
	#2 Niagra Restoration	SOLD			265	362	80	12	some habitat Plus roadside Hazard tree removal; some in owl habitat--no BA
	Packsaddle	PLANNED			35	304	51		
Mad Creek			145	240					
	Monument Creek	SOLD				82	9	12	
	Sevenmile	SOLD				158			
Rock Creek			0	41					
	South Block Contingency	SOLD				41			Cut during fire
Scattered			0	312					
	Gates Hill					37			Sale not in future complex forest
	#1 Stout Creek					275			Sale not in future complex forest
Totals			1116	1994	870	1986	177	64	
			Values from Table 5 & A-1		Discrepancy from Table A-1		No Acreage My totals from text # given		
* Seems to be mostly roadside hazard tree removal; may have missed some									

* LYR Layered
OFS Older Forest Stand Structure
Landscape Design LYR/OFS

Darlene Chirman
Great Old Broads for Wilderness,
Cascade Volcanoes Chapter
7017 SE Martins Street
Portland OR 97206
805-455-3541



April 6 2021

Oregon Department of Forestry
odf.sfcomments@oregon.gov

**RE: North Cascade District FY2021 Annual
Operations Plan Revision
Santiam State Forest**

The Great Old Broads for Wilderness is a non-profit organization dedicated to the protection of our public forests and wild places. This letter is a comment on the revised operations plan for the Santiam State Forest responding to the 2020 wildfires that burned about 16,600 acres of the state forest. These comments are submitted on behalf of the Cascade-Volcano chapter, based in NW Oregon (Portland). There are chapters of Great Old Broads throughout Oregon, and our members frequently recreate and otherwise use and rely on areas of the Santiam State Forest impacted by this Operations Plan (OP).

We appreciate the opportunity to comment on the revised Operations Plan; we also commented on the Revised Implementation Plan, dated December 22, 2020. We find that very little changed as the result of public comments. The fact that the first post-fire timber sale was scheduled for the day the comment period closed seemed indicative that decisions had already been made. While additional information is available in the OP, we don't see any substantive improvements in the harvest plans.

A major concern is the post-fire logging in designated Future Complex Forests, both Layered (LYR) and Old Forest Stand Structure (OFS). These are forest stands that were set aside for forest diversity and habitat, without plans to harvest, to our understanding. We don't believe that this should change because they burned, even the moderate to severe burns of the stands targeted for harvest. From the text, it appears that 177 acres of Layered forest stands and 64 acres of OFS are slated for harvest. By cutting the dead and dying trees and replanting, these will no longer have the desired complex structure. This is reflected in the proposed changes in designation to GEN (general?) and downgrading from OFS to LYR. We contend that the loss of complex structure is not due to the fire but to post-fire logging. Not only are dead trees removed but "dying trees" that can still contribute shade, perches and insect prey for birds, the fragile burned soils are disturbed, disrupting the extensive growth of understory species that usually follows a fire.

Allowing forests to recover naturally following a wildfire ensures complex forest structure with diverse vegetation, which in turn supports increased biodiversity. Removing burned trees

and snags and replanting the forest with Douglas-fir or a limited mix of conifer species can prevent development of this complex structure, harming fish and wildlife¹. Further, if burned forests are allowed to keep their structural complexity, according to the Bureau of Land Management, they can develop old growth forest characteristics twice as fast² as dense, replanted forests, and old growth forests store far more carbon than young growth. See the Summary table that we synthesized Table A-1 from the OP and information from the text and other parts of the document and appendices. Carbon storage remains about 85-90% of pre-fire stores; the carbon is lost when the stands are harvested. Units that have already been sold, which is most, should have the complex forest acreage withdrawn from the sales.

Northern Spotted Owl (NSO) habitat was burned in the fire, and timber sale in Gawley Panther is planned for 5 of 12 units. The OP states that the ODF biologist will prepare a Biological Assessment (BA) for review by USFWS. In addition NSO circles were impacted by fire along roads in both Gawley and #2 Niagara Restoration management areas, and the OP states that no BA is required where roadside hazard trees are to be cut. Recent research demonstrates that spotted owls continue to utilize burned forests³, and the regeneration understory attracts a prey base. It is when the burned forest is logged that the spotted owls abandon their territory.

We request that the Department of Forestry include the roadside hazard tree removal areas where NSO circles are known to exist pre-fire in the BA, even though it is not legally required. The USFWS may have recommendations to minimize negative impacts while ensuring human safety along these roadsides. We have several suggestions to be considered to reduce impacts, although we have no data to ensure that these measures will keep the NSO from abandoning these territories:

- Evaluate road segments with known Spotted Owl circles, and determine if these could remain closed for longer, so that the burned trees could fall naturally, over time.
- Top trees, leaving tall snags, short enough that they will not obstruct the roadway when they fall naturally.
- Fell trees with all motorized vehicles remaining on the road, to minimize soil disturbance. Regeneration of the understory would not be inhibited, which attracts owl prey species.

¹ Swanson, M.E., Franklin, J.F., Beschta, R.L., et al. 2010. The forgotten stage of forest succession: early-successional ecosystems on forest sites. *Front Ecol Environ* 2010; doi:10.1890/090157

https://www.fs.fed.us/pnw/pubs/journals/pnw_2010_swanson001.pdf and Donato, D.C., Campbell J.L, and Franklin J.F., 2012. FORUM Multiple successional pathways and precocity in forest development: can some forests be born complex? *Journal of Vegetation Science* 23 (2012) 576–584 http://people.forestry.oregonstate.edu/john-campbell/sites/people.forestry.oregonstate.edu.john-campbell/files/Donato_2012_JVS.pdf

² Bureau of Land Management 2008. Western Oregon Plan Revision Draft Environmental Impact Statement. https://www.blm.gov/or/plans/wopr/files/Science_Team_Review_DEIS.pdf

³ Bond, M.L., D.E. Lee, R. B. Siegel, and J. P. Ward, Jr. 2009. Habitat use and selection by California spotted owls in a postfire landscape. *Journal of Wildlife Management* 73:1116- 1124.

- Fell trees without retrieval of the logs, again to reduce soil disturbance, and the downed wood provides habitat for small wildlife.

The OP does not mention the proposed Habitat Conservation Plan. We contend that the areas proposed for Habitat Conservation Areas and Riparian Conservation Areas should not be subjected to post-fire logging, but be allowed to recover naturally. When we raised this issue in commenting on the Revised Implementation Plan, we were told that the post-fire recovery is guided by the current Forest Management Plan (FMP). However, the BOF has the discretion to be more conservative than the minimum requirements of the Forest Management Plan, and should allow natural regeneration to occur in these stands. Since the OP did not consider the Habitat Conservation Plan, we do not know what areas burned and are proposed for post-fire logging. However, the designated stands are known habitat for listed species, or have the potential to become habitat as the stand matures. Logging these stands sets back their habitat value to a greater extent than the fire itself.

We appreciate that “Under this plan, riparian protections will meet or exceed the standards outlined in the FMP.” Also that no timber sales are planned within the Aquatic Anchors in FY2021, that have increased water protections since designated in 2011, except for some roadside hazard trees. According to the OP Aquatic and Riparian Management section, 142 stream miles burned of a total 174 stream miles within the fire perimeter. It states that “larger buffers will be utilized on many post-fire harvests based on site-specific conditions and in collaboration with ODFW and the Dept of Environmental Quality. We applaud the planned planting of 65 acres of severely burned habitat on Sevenmile Creek with red alder and Western hemlock seedlings, as long as the standing burned trees are not felled.

A major concern for us is the drinking water watersheds serving downstream communities. After any wildfire, there is generally increased sedimentation into the streams. This is exacerbated with logging, disturbing fragile post-burn soils. The loss of the O horizon, the organic layer or forest duff, makes the soils more erosion-prone. According to Table A-2, there are domestic water sources affected by sales in two management areas: #2 Niagara Restoration and Gawley Panther. For example, from the Pre-Operations Report for Niagara, there are “multiple domestic water sources”, with inlets 40 feet and 1000 feet downstream from harvest units. In addition to significantly larger buffers, other erosion-control measures may be needed, depending on topography and other conditions.

Forest roads within the fire perimeter are 190 miles in length, per the OP; no percentage of burned roadsides is provided. The stated purpose for the road network are forest management activities, fire suppression and recreation. Roads generally increase the human-caused sources of fire ignition, so maintaining roads for fire suppression seems counter-productive.

Hazard Tree Removal from roadsides appear to cover almost 1000 acres, about ½ the size of harvest units. Trees determined to be hazardous will be removed up to 1 ½ tree height on each side of the road. This seems to be a huge impact, with loss of forest aesthetics, habitat and carbon storage. The USFS, which we do not consider a model for hazard tree removal, is using one tree height from the road, extending to 1 ½ tree heights only in areas of high use where people congregate such as

camping areas, viewpoints, and pullouts. The couple of Pre-Operation reports reviewed, the aerial photos demonstrated burns, except for two road segments in the second aerial photo of Niagara that appears to be green roadways. Why would that be?

In summary, we wish to emphasize our objection to post-fire logging of complex forest stands; they should be allowed to regenerate naturally. Some of these stands are over 100 years old, and harvesting would not be allowed pre-fire. We contend that these stands should not be harvested post-fire, as they regenerate as valuable early seral forest communities with high biodiversity and retained carbon storage for decades with gradual release of carbon. We have expressed our concerns about Northern Spotted Owl habitat, which should not be harvested, and riparian buffers sufficient to protect the drinking water of downstream communities.

Thank you for your consideration of our comments on the Revised Annual Operations Report for the Santiam State Forest.

Sincerely,

A handwritten signature in cursive script that reads "Darlene Chirman".

Darlene Chirman
M.S. Ecology, University of Davis
Leadership Team, Cascade-Volcano Chapter
Great Old Broads for Wilderness



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www.HamptonLumber.com

April 6, 2020

Via Email: odf.sfcomments@oregon.gov

Oregon Department of Forestry
2600 State St.
Salem, OR 97310

RE: North Cascade District FY 2021 Revised Annual Operation Plan

Dear State Forester Daugherty:

Thank you for the opportunity to comment on the North Cascade District FY 2021 revised annual operation plan (AOP). We appreciate the Oregon Department of Forestry's (ODF) response to the devastating 2020 wildfire season and the corresponding restoration efforts.

The comments below are similar to those provided during the implementation plan revision public comment period in December 2020, as well as to the Board of Forestry in March 2021. We still have concerns over the low number of identified acres for post-fire harvesting, increased riparian buffers sizes, and constrained economic opportunities for restoration for the Santiam State Forest and the surrounding communities that were heavily impacted by the wildfires.

Harvest

The AOP identifies 3,110 acres for regeneration or partial cut harvest activities. That amounts to less than 19 percent of the 16,600 acres that burned at various severities within the state forest. It is difficult to understand how the remaining 81% could be considered inoperable, unmerchantable, or set aside for buffers. This means ODF is likely electing to forego restoration of a meaningful acreage of the land base and harvest volume that would generate revenue for ODF, trust land counties, as well as supply the milling capacity in the region.

Post-fire harvest sales that have been awarded so far have gone for high market prices. The average price per thousand board feet (MBF) of the six sales offered, including contingency sales, is \$548.38. This exceeds the average log prices in the region over the past several years. A substantial portion of that revenue goes to the communities most impacted by the fires and to the restoration efforts that will produce tangible benefits for decades.

As you know, many trees will continue to die due to stress from the fire. While some trees may appear to have adequate crown retention, that does not mean they are still alive. Needles do not fall immediately after mortality. Dead and dying trees need to be identified and included in post-fire harvests before they lose their value. Waiting until FY 2022 or FY 2023 to harvest these trees

assuredly risks losing merchantable value. Leaving dead trees standing also invites insect infestation that expands into stressed live trees and beyond the existing ODF fire perimeter, increasing the ultimate loss of forest inventory and value, and leaves stands even more vulnerable to future fire.

Aquatic and Terrestrial Management

The AOP says stream buffers will meet or exceed Forest Management Plan (FMP) Riparian Management Area (RMA) requirements. There is no obvious reason why FMP RMA rules would be insufficient, so why is ODF planning to create larger buffers than is required, especially when 84% of the 206 miles of streams within the fire perimeter were burned at some severity.

Concerns have been raised about harvesting in certain Desired Future Condition stands. ODF does have an obligation to manage forestlands in compliance with the current FMP. However, if those stands are within the moderate to high severity burn areas, do they still provide the same ecological benefits as they did pre-fire? For example, the AOP describes the Rhody Lake terrestrial anchor site (TAS) as 83% burned at moderate to high severity, but there is no regeneration harvest identified in the TAS, only partial cut along roadsides within the Gawley Panther proposed sale. Does this TAS still provide those same benefits, or would it be more environmentally beneficial to harvest and replant? Moreover, leaving dead trees standing could pose safety concerns to contractors working in the forest and eventually to the public when the state forest is reopened.

Restoration

As evidenced by other burns on federal lands in the vicinity of the Santiam State Forest, failure to restore burned acreage condemns the land to decades if not centuries of lost productivity and environmental degradation. Post-fire harvest and reforestation is critical to the Santiam Canyon's short- and long-term future. Rebuilding the communities impacted by the fire will be much more difficult without revenue from post-fire harvest and rehabilitation of the land that so many benefit from.

Oregonians have restored and rebuilt forests before and can do so again. The state has the responsibility to all Oregonians, but especially those most impacted by the fires, to do what's best and restore these lands as quickly and sustainably as possible. We urge the you to approve this revised AOP so that restoration efforts may continue.

Sincerely,

A handwritten signature in black ink, appearing to read "Laura" followed by a stylized surname.

Laura Wilkeson
State Forest Policy Director
Hampton Lumber

COX Jason R * ODF

From: oregon-gov-web-services@egov.com
Sent: Friday, April 02, 2021 4:06 PM
To: SFCOMMENTS ODF * ODF
Subject: State forests public comment
Attachments: formsubmission.csv

Follow Up Flag: Follow up
Flag Status: Flagged

Name	Nathan Heintz
Email	[REDACTED]
Phone	
Subject	North Cascade District FY2021 Annual Operations Plan Revision
Comments	<p>I am adamantly opposed to any and all clearcutting or modified clearcutting in Oregon forests, regardless of whether they're damaged or not. Post-fire is a delicate and important recovery time for wildlife including owls and other predatory birds and their prey. Just because a forest has been damaged by fire doesn't mean some big timber companies get to come in and cut the trees while paying low wages and poor benefits to their workers. That's OUR public land. It's not for privatization and profit. And damn well not prioritizing profits over the health of the ecosystem. There should be citizen-run oversight committees including a range of ecologists and biologists managing these decisions, not political and corporate interests who want to continue to rob the public of their common assets. If you want to cut a single tree on public land you should have to be a part of a public, worker-owned cooperative that supports local economic and ecological recovery, not just enriching the already-rich. Protect the public good and say no to corporations moving in on our delicate habitats and exploiting people. I'm opposed to this plan because it threatens our ecological diversity and the health of our public lands and it does nothing to repay the public for the value that is being stolen by corporations. Stop clearcutting and stop selling the commons to corporate logging interests!</p>

Submission ID: 6a1d0909-bf3d-4fd7-8d54-e26167604011

Record ID: 376

Commenter: Greg Jacob, SFAC member

Date: April 1, 2021

Message:

Dear ODF Santiam State Forest,

As the environmental member on the State Forest Advisory Committee, your plan to clearcut 3500 acres is excessive. For one, older, complex forests should be excluded. Second, clearcutting will affect wildlife habitat (e.g. spotted owls) and it will create erosion sending dirt into streams. Third, logging the older burned trees will release their stored carbon. Burned forests left on their own will recover and mature into old-growth faster than salvage-logged forests. Fourth, why clearcut areas that the ODF is planning to designate as an HCP?

Please step back from this plan and fully evaluate how the Santiam State Forest could contribute to healthy habitat and climate goals before moving forward with this profit-driven timber strategy.

Sincerely,
Greg Jacob, SFAC



Hillsboro, OR 97124

COX Jason R * ODF

From: Tim Johnson <[REDACTED]>
Sent: Saturday, April 03, 2021 6:43 AM
To: SFCOMMENTS ODF * ODF
Subject: Post-fire management of Santiam State Forest

Follow Up Flag: Follow up
Flag Status: Flagged

Greetings,

In developing a post-fire logging and management plan for the Santiam State Forest, I encourage the following plan priorities:

- 1) avoid clear cutting,
- 2) leave live trees standing,
- 3) allow the forest to regenerate naturally whenever possible, and
- 4) protect the water quality of the North Santiam River.

Thank you,

Tim Johnson
Salem, OR
[REDACTED]

COX Jason R * ODF

From: oregon-gov-web-services@egov.com
Sent: Friday, April 02, 2021 11:19 PM
To: SFCOMMENTS ODF * ODF
Subject: State forests public comment
Attachments: formsubmission.csv

Follow Up Flag: Follow up
Flag Status: Flagged

Name	MACKENZIE MARK-MOSER
Email	[REDACTED]
Phone	[REDACTED]
Subject	Other
Comments	<p>Greetings, I'm writing to ask that ODF consider revision of the current district Annual Operations Plan (AOP) for the Santiam State Forest. As a lifelong resident of Oregon, I've grown up roaming and recreating in the forests of the Cascades. I have always been so grateful for these natural spaces-- adding so much to our local beauty and ecology. The fires that struck the Santiam over Labor Day weekend 2020 were an absolute shock, and so devastating on so many fronts. As I've kept track of and participated in restoration efforts and dreaming about returning to the areas burned, I have started learning about best practices to restore burned forests with a long view in mind that supports the ecology that many Oregonians rely on for our livelihoods and recreation. I appreciate ODF's reception and consideration of these comments regarding the management plan for the Santiam State Forest. I ask that ODF considers revision of the current district AOP to avoid logging the old forests in the Santiam State Forest that were affected by the Labor Day fires. After clearcut logging, increased erosion can remove the healthiest topsoil needed for regrowth and leave massive deposits in streams, which damage the river ecosystem as well. Every tree removed and soil damaged by logging reduces habitat for key Oregon species, such as the Northern spotted owl, a variety of woodpeckers, and other insects, mammals, and groundcover plants that sometimes ONLY thrive in post-burn areas. If these forests, including potential ODF Habitat Conservation Areas, are logged, the damage to rare/threatened/endangered species in addition to others could linger for many years to come. These detrimental effects can be mitigated by leaving the burned forests to regenerate naturally. Further, the unlogged burned forests continue to store carbon, which is released by logging. If the burned forests are left unlogged, old-growth may be able to mature rapidly, more quickly bringing back the forests we enjoy recreation in, and becoming a crucial carbon sink. Addressing climate change will require the protection of forests, including burned forests, and this is an opportunity for ODF to actively contribute to a climate solution and Governor Brown's Climate Action Plan (EO 20-04). Again, I'm asking that ODF reconsider the AOP and preserve the burned forests of the Santiam State Forest in order to assess the very real near- and long-term benefits of leaving these forests intact. These could be negated by logging, which can only turn a short-term and unsustainable profit that hinders long-term recovery. Thank you for your time,</p>

Submission ID: c8fdd8b4-d326-414d-968e-11387418d069

COX Jason R * ODF

From: KAUPP Kyle F * ODF
Sent: Monday, April 05, 2021 12:24 PM
To: RINGO Jennifer B
Cc: FARRAND Alex; MYERS AnneMary; WALCZAK Ben; WOLFER Brian H; KELLEY Elise X; REED Gregory C; BOECHLER Jeff; LICENCE Kurt L; BUCH Ole * ODF; KRAHMER Rod W; COX Jason R * ODF; KISER Colleen R * ODF; KROON Jodi E * ODF; DICKSON Austin L * ODF
Subject: RE: ODF North Cascade District Revised Annual Operations Plan

Jennifer-

Thank you for your comments. I will forward them to Jason Cox, our State Forest Public Affairs Specialist, as well as our planning and coordination team in order for your comments to get officially recorded within the AOP process.

On a district note, thank you for your willingness to provide comment and I look forward to collaborating with you and your staff as we get through the restoration process.

Thanks,

Kyle Kaupp
Santiam Unit Forester
Santiam Unit - North Cascade District
22965 North Fork Rd. SE
Lyons, OR 97358

Mobile: (503) 931-2352



From: Jennifer Ringo <Jennifer.B.Ringo@state.or.us>
Sent: Monday, April 05, 2021 12:10 PM
To: KAUPP Kyle F * ODF <Kyle.F.KAUPP@oregon.gov>
Cc: FARRAND Alex <Alex.Farrand@state.or.us>; MYERS AnneMary <AnneMary.Myers@state.or.us>; WALCZAK Ben <Ben.Walczak@state.or.us>; WOLFER Brian H <Brian.H.Wolfer@state.or.us>; KELLEY Elise X <Elise.X.Kelley@state.or.us>; REED Gregory C <Gregory.C.Reed@state.or.us>; BOECHLER Jeff <Jeff.Boechler@state.or.us>; LICENCE Kurt L <Kurt.L.Licence@state.or.us>; BUCH Ole * ODF <Ole.Buch@oregon.gov>; KRAHMER Rod W <Rod.W.Krahmer@state.or.us>
Subject: ODF North Cascade District Revised Annual Operations Plan

Hi Kyle,

I wanted to let you know that ODFW district fish and wildlife staff have reviewed the North Cascade District Revised Annual Operations Plan (AOP) and did not have any major concerns. We appreciate that ODF took our earlier comments

on the implementation plan into account and provided more detail on harvest locations and additional wildlife monitoring in the AOP. One area we felt that could be addressed more thoroughly in the AOP is accounting for climate change in reforestation practices, such as planting at lower densities and using genetically diverse seed to increase resiliency over time (see <https://www.sciencedirect.com/science/article/abs/pii/S0378112720314742>). Also, we urge ODF to consider leaving more snags in areas with few green trees to increase vertical structure and security habitat for wildlife where feasible.

We thank ODF for providing us an opportunity to comment and for coordinating with ODFW throughout this process. We look forward to working with you and other partners and assisting with post-fire restoration as much as possible. Please contact me at 541-757-5242 if you would like additional information.

Thank you,
Jennifer

Jennifer Ringo

Acting Watershed District Manager
South Willamette Watershed District
Oregon Department of Fish & Wildlife
Office: 541-757-5242
Cell: 503-302-4456
Jennifer.b.ringo@state.or.us



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April 6, 2021

Via Email: odf.sfcomments@oregon.gov

Oregon Department of Forestry
2600 State Street
Salem, OR 97310

RE: North Cascade District FY 2021 Revised Annual Operations Plan

Dear State Forester Daugherty,

Thank you for the opportunity to provide comments on the North Cascade District FY 2021 revised annual operation plan (AOP). The Oregon Forest & Industries Council (OFIC) is a statewide trade association representing forestland owners and forest products manufacturers. Its members own more than 90 percent of Oregon's large, privately owned forestland. OFIC's core mission is to advocate on behalf of its members to maintain a positive, stable business operating environment for Oregon's forest products sector that fosters long-term investments in healthy forests; to ensure a reliable timber supply from Oregon's public and private forestlands; and to promote stewardship and sustainable management of forestlands that protect environmental values and maintain productive uses on all forestlands.

The devastation of this summer's wildfires is heartbreaking and tragic. Landowners across Oregon face similar challenges as all seek to recover and restore what was lost. As a member of that community, OFIC supports active restoration and recovery efforts. Active management is vitally important to help stabilize soils and stream banks, promote clean water, foster carbon sequestration, and restore fish and wildlife habitat for generations. The timely harvest of standing dead trees followed by reforestation maximizes the value of forest resources.

OFIC is concerned with the Departments plan to only harvest and reforest on a fraction of the State Lands impacted by these fires. The recently approved North Cascade District Implementation Plan (IP) lists approximately 9,000 acres of State land in merchantable age classes that were either moderately or severely impacted by the wildfire, yet according to this AOP only approximately 3,000 of those acres are scheduled for recovery harvest in FY 2021. The goal of these efforts should be prompt and effective recovery. Economic value can help offset the cost of recovery and ensure fiber is stored in long-lived wood products. ODF should manage our public forests in a way that will accelerate recovery. Recent polling shows [strong public support](#) for these recovery efforts.

The IP also refers to leaving over 100-miles of riparian forests potentially unmanaged, even those that have been highly damaged by the fire. Standing dead trees offer very little benefit to riparian function. Leaving these stretches of burned riparian forest untreated in the short run will result in increased sediment yields, and long term will surely result in large swaths of thick brush and scattered hardwoods along the streams. While brush and hardwoods offer some value to riparian function, a healthy aquatic

ecosystem in the Cascades of Oregon includes a significant proportion of conifer trees – which will be unlikely without a concerted recovery effort. OFIC highly recommends recovery efforts adjacent to these streams to provide short and long-term ecologic value. A targeted strategy to recover these important riparian areas will pay dividends for generations to come.

In the Pacific Northwest there are several examples of similar restoration efforts from previous generations that benefit society today. When Mount St Helens erupted in May of 1980 it left a devastated forest ecosystem in its wake. Two management paradigms emerged from that event; natural recovery and accelerated recovery through management. Forty years later the contrast could not be more stark; lush green forest on private and State ownership comes to an abrupt end at the border with National Volcanic Monument Land.

Another example solidly etched in the psyche of every Oregonian is that of the Tillamook burn. Following a series of fires, State and local foresters teamed up with community members from across the region in that massive reforestation effort. 70-years later all Oregonians benefit from that hard work and dedication of those pioneers. We love our Tillamook State Forest.

Both familiar examples offer tangible evidence of the long-lasting and real value that comes from sound stewardship through focused harvest and reforestation recovery efforts. Oregonians expect the State to follow in the footsteps of these pioneers to effectively recover these vital forest resources. OFIC urges the State to manage all the forests in the State's care towards effective and efficient recovery. This is vital recovery effort, if done well, will leave a legacy of stewardship for generations to come.

Thank you for the opportunity to provide comments.

Sincerely,



Seth A Barnes
Director of Forest Policy
Oregon Forest & Industries Council

From: [David Harrison](#)
To: [SFCOMMENTS ODF * ODF](#)
Subject: Comments on revised implementation plan for Santiam State Forest
Date: Sunday, April 04, 2021 6:43:58 PM

Please accept these comments on the Santiam State Forest Revised Implementation plan on behalf of the one thousand members of Salem Audubon Society. We are disturbed that the proposed plan tilts too heavily toward logging and giving short shrift to environmental values such as wildlife habitat, water quality, and forest resilience in the face of climate change.

Most of the proposed logging is designated regenerative, which is in effect clearcutting standing dead trees and then replanting. While the areas logged will be reforested under the revised implementation plan, other than the areas replanted using aerial seeding, only Douglas fir seedlings will be used. This means that more complex layered stands will be replaced with even-age monoculture plantations of Douglas fir. This undermines the Department of Forestry's stated goal of maintaining complex forests. While this involves less than 3% of the burned acreage, complex forest structure is already too rare on state lands, and any reduction is too much.

Water quality is also a concern for those of us that depend on the Santiam River watershed for our drinking water. Clearcutting burned forest will inevitably lead to sediment runoff and degradation of water quality in the North Santiam River.

We urge you to reconsider and come up with a plan that protects water quality, avoids clearcutting, leaves live trees standing, and allows the forest to regenerate naturally wherever possible. Thank you for your consideration.

David Harrison
Conservation Chair
Salem Audubon Society

Name: Mary Ann Scott, G&M Scott Farms

Address: [REDACTED], Sublimity 97385

We would like to see all burned timber harvested now and replanted immediately at planting time. This will keep insects from getting into dead trees and stuff left on the ground. It would create thousands of jobs for people out of work. People want to work.

It would probably bring down the price of lumber, which is skyrocketing right now and would make it more affordable for people rebuilding and even myself, because I need to replace a roof. We need to stop importing timber from Canada when we have millions of acres here and it would give more opportunities for people like me to make a living. You only get once-in-a-lifetime chance to make anything off of timber once it is planted. Don't leave it like it was in the Santiam Pass.

COX Jason R * ODF

From: Ron Sterba <[REDACTED]>
Sent: Saturday, April 03, 2021 10:57 AM
To: SFCOMMENTS ODF * ODF
Cc: Ron Sterba
Subject: Let the lumber company made the decision

Follow Up Flag: Follow up
Flag Status: Flagged

I can understand conservation by the groups but they failed to look beyond 6 feet in front of them at the forest. Mount Washington area that was burned over a decade ago is a hazardous area now for walking. I can no longer walk down the area as I fear the whole time a branch or tree break-off and fall on us. That's not the type of nature walk I would enjoy! If the tree is doing well and not burned let it go let it continue its growth but all the dead ones need to be removed. Our lives count and we enjoy our forest but not at the cost of a conservationist who knows nothing about forestry of logging or very little. As for the conservationist and their comments about water quality I agree however the bottom floor or our forest will return just like on Field- burning grass-seed farms, the forest's ground-cover will return very robust just a year following the big fire. The forest will not contaminate streams! As for the dead trees left behind in forest fires our state does not have the monies to cut down the burnt and diseased trees around the walking path through our state forests. I have climbed thousands of trees known as utility poles and believe me I can tell you when a tree is rotten inside when my gaff goes in freely into the wood IAM NOT CLIMBING IT! Keep our forests SAFE IN YEARS/decades to come. I have witnessed truckloads of burnt logs going to be utilized as early as yesterday. Great work to teams managing the cuts!

Thanks
Ronald Sterba
[REDACTED]
Salem Oregon 97301

Sent from my iPhone

COX Jason R * ODF

From: oregon-gov-web-services@egov.com
Sent: Wednesday, March 24, 2021 1:07 PM
To: SFCOMMENTS ODF * ODF
Subject: State forests public comment
Attachments: formsubmission.csv

Name	Sherree Tatum
Email	
Phone	
Subject	Other
Comments	These comments regard the post-fire activities in Santiam State Forest. Logging introduces invasive species and removes valuable components of the ecosystem necessary for natural renewal of native species. Reforestation ignores the micro evolution of trees within small landscapes (the north side of a hillside for example) to have evolved to be best suited to that micro climate. Additional logging is not to the benefit of forest health. Remember the lessons of Yellowstone NP, which burned and returned without intervention.

Submission ID: e6e4e5e0-4f39-4f6e-9887-a2e8867bcbe2

Record ID: 372

COX Jason R * ODF

From: Jo Williams [REDACTED]
Sent: Sunday, April 04, 2021 9:55 AM
To: SFCOMMENTS ODF * ODF
Subject: Post wildfire logging plans

Follow Up Flag: Follow up
Flag Status: Flagged

Just having read the Statesman Journal article on the disagreements between timber and conservation interests, there might be a way of, accommodating, many of the concerns about cutting the still-living trees; allow monitors in to be present, oversee the larger harvesting areas.

The state could subcontract, appoint, designate, members of both the timber and environmental groups to keep an eye on the harvesting efforts, with at least one member from each group at each site.

I can sympathize with both views, both groups' concerns. Maybe, working together, they can make this a best-case outcome?

Jo Williams, Keizer, OR
[REDACTED]