

FY 2024 ANNUAL OPERATIONS PLAN

Public Comment Summary

Public Involvement and Summary of Changes:

FY 2024 Annual Operations Plans for Astoria, Forest Grove, Klamath-Lake, North Cascade, Tillamook, West Oregon and Western Lane Districts

In order to engage with Oregonians, the Oregon Department of Forestry (ODF) held a 45-day public comment period, which began April 25th, 2023, for the upcoming fiscal year's Annual Operations Plans (AOP). The public was notified via a statewide news release 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, Instagram & Twitter platforms. Public comment was accepted through the ODF website, email, or letter, as well as a survey that will help the department gather some aggregate data on public opinion regarding state forest matters and forestry generally, as well as ways to improve our public outreach strategies.

In all, ODF received 29 written comments related to the fiscal year 2024 (FY24) Annual Operations Plans for the Astoria, Forest Grove, Klamath-Lake, North Cascade, Tillamook, West Oregon and Western Lane districts.

Comments received that resulted in edits to specific timber sales are detailed in Appendix D of the district Summary Documents and detailed at the end of this document. The following is a summary of comments received and agency responses to the comments.

RECREATION COMMENTS

The agency received a number of comments regarding recreation. General comments included:

- Consider specifying in Annual Operation Plans which trails will be maintained and how.
- Recommend describing what factors are considered when deciding to vacate a trail and encourage ODF to consider public engagement prior to the decision being made.
- One commenter noted that closing trails to allow for timber harvest is ODF prioritizing one use over another when Oregonians have identified greater support in balancing those interests.
- ODF received specific comments regarding the Nicolai Off-Highway Vehicle (OHV) area in Clatsop County and on recreation in the Santiam State Forest.
- Nicolai OHV area in Clatsop County
 - Recommend increasing ODF and law enforcement presence in the OHV area.
 - Consider trail filters on all trails and bridge crossings, replacing bridges, providing more rock at trail heads for the commenter (an OHV club) to do maintenance on the trail network.

- Consider developing a designated trail from both staging areas to the top of the mountain to access the truck trails, a 35-mile single track area for the dirt bikes, and a perimeter trail around the OHV area.
- Santiam State Forest
 - Recommendation that Santiam Horse Camp, Stout Creek, Shellburg Falls, and Monument Peak should be protected.
 - Concern that extensive cutting after wildfire will destroy beloved recreational areas in the Santiam Canyon.
 - One commenter noted that Stout Creek Falls is a tourist destination that has steep, unstable slopes, but the Department of Forestry is starting to remove trees in the area around the falls.
 - Recommendation to send in expert crews to restore public access to trails.

Recreation Comment Response:

Trail/Harvest interactions: State forests are working forests and it is inevitable there will be interactions with the growing recreation infrastructure and forest management activities. The Department of Forestry recognizes that timber harvests can and often do change the trail setting on the landscape and the use experience for trail enthusiasts. The agency works in an integrated manner across the Recreation, Education and Interpretation, young stand management, roads and forest management teams to address these situations. Managing Oregon’s state forests for multiple uses is often times a balancing act, appreciating that a portion of the associated timber harvest revenues support recreation trails, facilities, and infrastructure across state forests. ODF fully recognizes the importance of the trails adjacent to and within the sale areas. For trail mitigation measures, foresters will work in conjunction with recreation unit staff as well as other team specialists to achieve a mix of social, economic, and environmental benefits during sale layout consistently across the division.

ODF employs many different methods to minimize disruption to trail access as well as impacts to both trail setting and visitor experience. Temporary trail closures occur where public safety issues are present within operationally active timber sale areas or during road construction and maintenance activities. Our goal is to minimize impact to both public use and trail infrastructure as much as possible and to restore and safely re-open trails after timber sale and road construction activity. During the planning process trails within timber sale areas that do not meet sustainability or resource protection goals are considered for vacating and re-routing to restore and maintain the trail opportunity.

ODF works closely with public stakeholders to manage and maintain recreation trail opportunities on state forest land and to consider re-routes, temporary trail closures, and permanent trail closures. The Annual Operations Plan public review process also allows the public an opportunity to provide valuable opinion and comment on recreation management on state forest land.

Trail Maintenance: Trail condition assessments on all trail miles are completed annually to identify maintenance needs. Specific maintenance plans are developed within the fiscal year based on yearly trail condition assessments. FY24 Annual Operations Plan publication occurs prior to completion of FY24 trail condition assessments. The goal is to maintain all trail miles to operational standards based on use type and difficulty level while still maintaining the appropriate resource protections. Although maintenance needs vary yearly based on winter weather conditions and use intensity, past practice

indicates that approximately 1/3 of the trail miles will require significant or heavy trail maintenance each year.

Nicolai OHV area in Clatsop County: The ODF OHV Program has increased staff presence in the Nicolai OHV Area for trail patrol, trail maintenance, and trail project activities and plans to maintain a consistent level of staff presence throughout the year. In addition to increased staff presence, ODF has been providing funding to support a full-time Clatsop County Sheriff's Office Forest Patrol Deputy. In June 2023 this position was filled, after staffing challenges over the last two years, which will help increase law enforcement presence in the Nicolai OHV area.

ODF recognizes the commitment the local OHV community has made over the years to develop and maintain the Nicolai OHV trail system. The ODF Recreation, Education, and Interpretation (REI) Program is working with the local OHV community to complete trail condition assessments, develop specific trail maintenance and trail improvement plans, and accomplish work that will include filtering trails, replacing trail bridges, rerouting trail segments, and regrading and surfacing trails. Some of this work will take place in FY24. For example, three trail bridges will be replaced on the McNary Trail.

There are also improvements and additions that can be made to the Nicolai OHV Trail system to improve connectivity, flow, sustainability, and diversity. REI staff are in the early stages of the trail planning process which includes collecting information (trail inventory, observational data on use and use type, trail assessment, etc.) to support trail planning work. ODF recognizes that the OHV use community would like this work to move forward more quickly but as a program and agency we are just now getting to the place where we can advance the level of planning work necessary in order to develop a trail system plan for the area. New trail opportunities (miles, types, and locations) in the area will be determined through future planning process that will include ODF staff and local OHV community representatives.

Santiam State Forests Recreation: Post-fire restoration of recreational resources in the Santiam State Forest is ongoing. Many recreation opportunities have been re-opened to the public including the Crooked Finger OHV Area, Santiam Horse Camp, Rock Creek Campground, Monument Peak Trail System, Rocky Top Trail and Natural Rock Arch Trail. Work continues in the Shellburg Falls Area and the High Lakes Recreation Area to repair damaged recreation infrastructure and improve public safety by removing dead or dying trees along roads or immediately adjacent to recreation infrastructure. The work to restore and re-open the opportunities in the Shellburg Falls area will continue in FY24 as documented in the North Cascade District FY24 Annual Operations Plan. Butte Creek Falls Trailhead and Butte Creek Falls Campground, which were unimpacted by wildfire will re-open once access to the Butte Creek area is made available to the public. ODF also plans to develop a trail connection between the Butte Creek Falls Campground and the Butte Creek Falls Trailhead in FY24 in an effort to improve trail opportunities in this popular area. Work around Stout Creek Falls was completed in FY21 and 22. No trees were removed from steep slopes.

CLIMATE CHANGE AND CARBON COMMENTS

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

- Several commenters noted that preserving mature and old growth trees is one of the best ways to mitigate climate change.
- Concern that the Annual Operation Plan documents do not reference carbon or the Climate Change and Carbon plan and that it is not being implemented. Recommend adding a section in the Annual Operation Plans to address carbon storage plans.
- Consider adding metrics on carbon storage and an assessment of whether planned harvests are expected to increase or decrease stored carbon in the Annual Operation Plans.
- Recommend that the Department take an active role in complying with Governor Brown's Climate Action Plan (EO 20-04).

Climate Change/Carbon Response:

Climate change and carbon sequestration are generally topics related to higher-level strategies in the Forest Management Plans or Implementation Plans. Instead of updating the current Forest Management Plans, the State Forest Division is currently focusing resources on the development of the draft Habitat Conservation Plan, new Forest Management Plan and supporting Implementation plans. As noted in the Carbon and Climate Change Plan (CCCP), formal integration of climate change and carbon sequestration goals and supporting actions is occurring during this new plan development process and will be in line with Executive Order 20-04. While the current Forest Management Plans, draft Habitat Conservation Plan, Implementation Plans and draft Annual Operations Plans don't address carbon or climate change directly, the main strategies of the CCCP are being implemented during this transition period and will result in a variety of forest stand conditions that maintain healthy, multi-species, vigorously growing forests, which will contribute to resilient healthy forests into the future.

Under the current plans, large portions of the landscape provide carbon storage and will continue to do so long into the future. These include areas that have a desired future condition of Layered or Older Forest Structure, draft Habitat Conservation Areas that are being implemented starting in FY24, riparian areas, no harvest wildlife areas, and forested areas that are inoperable, etc. In addition, existing old growth trees are also protected and are generally scattered individual trees or occasional small, isolated patches. The Northwest and Southwest Forest Management plans specifically reserve these remnant trees from harvest. Legacy structures retained (green trees, snags, down wood) within harvest areas will continue to store carbon while the seedlings regenerating around these structures will accumulate carbon.

Forest health strategies are addressed on a site-specific basis for areas impacted by insects and diseases such as Swiss needle cast and when reforestation plans are developed for planting and other young stand management treatments. Site specific prescriptions consider target species, aspect, elevation, soil types, Swiss needle cast risk where applicable, *Phellinus weirii* (laminated root rot) presence, required stocking guidelines, natural advanced regeneration, and the desired future condition of the stand. This will provide for a diverse, healthy, productive, and sustainable forest ecosystem over time that will be more resilient to change.

As part of the process to develop the Western Oregon State Forests Management Plan, performance measures and their targets for carbon sequestration will be developed with direct input from the Board of Forestry. Performance measures are monitored and enable the BOF and others to track progress toward Forest Management Plan goals and to maintain accountability for management commitments.

These performance measures are a work in progress. Once adopted, the agreed upon metrics for carbon sequestration may be included within Annual Operation Plans.

TIMBER HARVEST COMMENTS

Comments related to the state forests timber harvest program include:

- Recommendation that forests should remain unmanaged, or managed as minimally as possible.
- Recommendation to only harvest areas where Douglas-fir are planted too close together and replant with a mix of species.
- Management should ensure that there are clear streams, wildlife, and native plants and timber sales should be phased out.
- *Recommendation that forests plans should only include recreation on a limited basis and de-emphasize timber harvesting.*
- Support for State Forests Management, replanting, and road maintenance.
- Comment that State forests are set aside for recreation, water supplies, and wildlife.
- Recommendation to preserve the Santiam State Forest as a hiking area, as managers did in the Columbia River Gorge.
- Efforts should include plans to allow mature forests to grow.
- Recommendation to not clearcut in Habitat Conservation Areas on the Santiam State Forests that benefit of rare and endangered species.
- Several recommendations to prioritize keeping older stands rather than cutting them.
- Commentor noted that hardwoods are regularly removed, that the Annual Operation Plan prioritizes long term conifer production, and that hardwoods provide essential habitat and create diverse forest characteristics.
- On commentor asked for ODFs analysis that show how clearcuts or partial cuts are “necessary and prudent to improve habitat quantity and quality” and impacts of logging units located in draft Habitat Conservation Areas.
- Consider establishing a realistic yet ambitious timeline to achieve greater complexity in state managed forestlands.
- Increase the number of stands with complex desired future conditions to meet the key performance measure of at least 30% of each landscape being complex layered condition.
- Commentor noted that ODF is failing to meet Performance Measures for complex stands. Recommendation that existing clearcut prescriptions in older forests should be changed to partial cuts until Performance Measures can be met.
- Concern about discrepancies between the Forest Management Plan leave tree requirements and the draft Habitat Conservation Plans leave tree requirements and implementation of both simultaneously.
- Several commentors brought up concerns about and provided recommendations for changes to specific sales or projects ranging from dropping operations from this plan, making boundary modifications, or providing additional information for consideration.
- ODF should track progress on achieving landscape goals identified in Key Performance Measures.

- Question on planned strategies and tactics that ODF is deploying to meet the boards Performance Measure complexity targets in a timely manner.
- Concern over shorter (55-year) rotation ages not being consistent with management for the “Greatest permanent value.”

Timber Harvest Response:

Greatest Permanent Value: The operations and projects planned for this Annual Operations Plan seek to balance the agency’s legal obligation to manage state forests for social, economic and environmental outcomes, a concept commonly referred to as Greatest Permanent Value. State forests provide outdoor recreation, education and interpretation opportunities, essential wildlife habitat, clean water, and sustainable harvest volume that produces jobs and revenue that funds vital services in rural counties, local districts, and schools throughout the state.

Complex/Mature Forest Management: Implementation of these plans will result in a variety of forest stand conditions across the landscape that maintain healthy, multi-species, vigorously growing forests, which will contribute to resilient healthy forests into the future. This will be achieved by both active and passive management of the forests. New for the FY24 Annual Operations Plan, the draft Habitat Conservation Plan will be implemented for all FY24 sales for all districts except Klamath-Lake, identifies approximately 43% of western State Forests as draft Habitat Conservation Areas. In addition to the draft Habitat Conservation Areas, the current Forest Management Plans also identify areas across the landscape with a Desired Future Condition of complex forests. In many areas these desired future condition stands overlap with the draft Habitat Conservation Areas; however, there are a number of instances where they do not. Approximately 12% of state forests are designated as desired future condition complex stands outside of the draft Habitat Conservation Areas. Both the draft Habitat Conservation Areas and the desired future condition complex stands have been identified geographically on the landscape. Many stands with current complex structure or older age classes are within these identified areas.

Other areas outside of draft Habitat Conservation Areas and Desired Future Condition complex designations are managed for economic as well as other resource values. Interspersed throughout these portions of the landscape are no harvest riparian areas, no harvest wildlife areas, forested areas that are inoperable, scattered remnant old growth trees, recreation and scenic areas, etc. Rotation ages outside of the draft Habitat Conservation Areas are not set at a specific age but rather are a product of stand condition, stand health, and annual harvest objectives. These harvest objectives are set during the Implementation Plan development with the understanding that portions of any specific district have been set aside for habitat development and/or recreation.

As described in the Implementation Plans, ODF does harvest layered stands outside of the mapped landscape design for the Desired Future Condition and the draft Habitat Conservation areas. The Key Performance Measure report, that has a target to reach 30% complex structure over time on the Astoria, Forest Grove and Tillamook districts, is utilized to show the trends of ODF’s policy implementation over time to help inform decision making. The timeline to meet this target is outlined in the Implementation Plans and reflects the areas that are designated through the current plans and policies where these stand structures will be achieved over time. The 2022 Key Performance Measure Report shows that levels of complex stands are increasing across the landscape adding approximately

5,300 acres over the last three years (increasing complex structure from 10.17% to 11.23%, using Stand Level Inventory for the combined Astoria, Tillamook, and Forest Grove Districts). While putting together the FY24 Annual Operations Plans from the surveyed candidate pool, agency staff looked for stands that were both outside of the mapped Desired Future Condition and outside draft Habitat Conservation Areas for harvest. Some of these stands are currently layered stand structure or older stands. The harvesting of these type of stands is a tradeoff decision that was made in order to implement the current Forest Management Plans and honor the process of developing and implementing the draft Habitat Conservation Plan, while still meeting the harvest objectives within the Implementations Plans. The areas designated as desired future condition complex and the additional areas that have been designated as draft Habitat Conservation Areas have been identified as the highest priority for wildlife habitat and connectivity and are the location where older trees and complex stands will be grown over time. Focusing harvest in mature stands outside of these constrained areas ensures that other aspects of GPV and Implementation Plan objectives are being met while allowing younger stands to grow older and more complex in a sustainable matter.

Harvesting within draft Habitat Conservation Areas: The overarching management objective for draft Habitat Conservation Areas is to increase the quality and quantity of habitat for terrestrial covered species through both passive and active management. Therefore, the only management actions that will occur in draft Habitat Conservation Areas are those that will contribute toward achieving that objective, or at least will not preclude that the objective will be achieved. There are many pathways for achieving habitat conditions over the long-term. Stand management activities in portions of the draft Habitat Conservation Areas will be implemented in order to improve habitat for covered species. Typically, this will include a variety of density management prescriptions in healthy conifer forests to ensure that late-seral structure develops more quickly. In some cases, such as stands that are dominated by hardwoods or infected with Swiss needle cast, it will be more efficient to conduct regeneration harvests and replant a species mix that will develop into covered species habitat in a shorter time frame, however, many hardwood-dominated stands (70%) and Swiss needle cast stands (67%) within the draft Habitat Conservation Areas will remain unmanaged at least for the first 30 years.

The pace and scale of these activities is described within the draft Habitat Conservation Plan along with a description of the types of stand management that will occur in draft Habitat Conservation Areas. As the intention for management activities in these areas is to improve covered species habitat, stands that are already high-quality habitat will require little to no management. Stands that provide lower quality habitat or no habitat will be managed more frequently in order to increase the quality and quantity of habitat over time. The majority of stand management that will occur in draft Habitat Conservation Areas will target locations the model identified as low-quality habitat for covered species. Working with agency biologists, these areas will be field evaluated for suitability to develop potential candidates and generate appropriate prescriptions to ensure compliance with the commitments set forth in the plan.

Diverse Tree Species: Planting is comprised of matching the appropriate species and stock type to the planting site. Forest health strategies are addressed on a site-specific basis when the planting plan is developed. Site specific prescriptions consider target species, aspect, elevation, soil types, Swiss needle cast risk where applicable, *Phellinus weirii* (laminated root rot) presence, required stocking guidelines, natural advanced regeneration, and the desired future condition of the stand. To accomplish this, a mixture of species such as Douglas-fir, Sitka spruce, western hemlock, red cedar, noble fir, grand fir,

ponderosa pine, incense cedar and others are planted to provide for a healthy, productive, and sustainable forest ecosystem over time and to be more resilient to climate change.

Hardwood species have value for wildlife habitat; however, large expanses of red alder dominant stands with little conifer component are unlikely to develop into suitable or highly suitable habitat for some wildlife species. A portion of hardwood stands will be managed. Within these managed stands, existing conifers may be retained where operationally feasible, and some hardwoods may also be retained during harvest. Red alder seeds into recently cleared areas from nearby seed sources and big leaf maple will resprout from a cut stump continuing the presence of hardwoods in the forest. Many hardwood-dominated stands within state forests will remain unmanaged including within Riparian Conservation Areas, portions of draft Habitat Conservation Areas, and across the landscape within inoperable areas.

Green Tree Retention Targets: As stated in the summary documents there are two different leave tree requirements that are being followed for the FY24 Annual Operations Plan. For the most part these requirements overlap but there are some differences. The Forest Management Plans require that an average of 5 trees per acre be retained across an individual district Annual Operations Plan. These leave tree requirements included trees within Type N riparian areas, with availability fluctuating between sales and units. (e.g., one sale within a district Annual Operations Plan could have 10 green trees per acre, while another sale in the same district Annual Operations Plan could have 3 green trees per acre). The draft Habitat Conservation Plan has a leave tree requirement of 2 trees outside of the Riparian Conservation Areas per individual sale unit. Due to the preponderance of streams on the landscape it is relatively rare that meeting the draft Habitat Conservation Plan leave tree requirements will not exceed those of the Forest Management Plans. Green trees strategies will be evaluated during sale layout to ensure the requirements of all plans are met.

Specific Sale Response: All of the sale specific comments have been reviewed and considered by ODF staff. Some comments resulted in no changes while others prompted adjustments. Changes that have been made since the public comment period have been documented in the last section of this document and in Appendix “D” of each district Summary Document. Several comments that were received identified resource concerns (older stands, T&E habitat, slopes, draft Habitat Conservation Area management, streams, recreation, etc.) for specific sales. As sales are identified during the selection process they are screened for potential resource concerns and through our existing policies and plans with our staff specialists, district staff, and Oregon Department of Fish and Wildlife (ODFW). These resource concerns are taken into account when developing boundaries for the timber sales. This does not preclude management on these stands but instead adds potential boundary modifications, leave tree patches, seasonal restrictions, or adjusted contract language to ensure that the resource concerns identified can be adequately mitigated prior to harvest to ensure that the resources are protected, and management of these areas can proceed for the benefit of Oregonians.

FISH, WILDLIFE, AND STREAM ENHANCEMENT COMMENTS

- Concern that stream surveys for fish habitat locations are not specified. Recommend providing more information to allow the public to engage in identifying potential habitat to prioritize.
- Recommendation to improve habitat protection around nesting sites for Marbled Murrelets and Northern Spotted Owls.

- Several commentors recommended that stream locations and fish presence be confirmed prior to Annual Operation Plan approval.
- Several recommendations to provide specific project details, include goals for habitat enhancement and restoration, discuss prioritization methods, and provide firmer commitments for enhancement projects.
- Question about why Aquatic Anchor buffer management strategies are not included in the annual operations plans for clarity.
- Recommendation to prioritize stream enhancement projects within or adjacent to proposed Habitat Conservation Areas and provide information for public review.
- Recommendation to limit harvest within the Aquatic Anchors to mitigate cumulative effects.

Fish and Wildlife Response:

Stream Buffers: ODF implements riparian management strategies to ensure important riparian functions are maintained and where state forests are covered under the draft Habitat Conservation Plan, suitable habitat and protection is provided for the covered fish species and torrent salamanders as agreed upon by the National Oceanic and Atmospheric Administration (NOAA) and United States Fish and Wildlife Service (USFWS). This includes measures to protect non-fish-bearing and seasonal streams that serve important functions supporting aquatic habitat quality both within these waterways and affecting downstream waters. No harvest activities will occur in the stream buffers.

Streams will be protected by applying no harvest Riparian Conservation Areas from the draft Habitat Conservation Plan. The only exceptions to this is within the designated Aquatic Anchors where no harvest zones will be extended out to 50 feet when regeneration harvesting near small perennial, debris flow-prone, and high-energy non-fish streams as outlined in the State Forest Division Species of Concern Policy; or when a small, non-fish stream is designated as Type D or is within the confluence of a fish stream, then the buffers for those reaches detailed within Oregon Forest Practices Act may be applied.

Stream Surveys: Fish presence and stream seasonality are determined on all streams prior to a sale being sold. Where possible this work is completed prior to the Annual Operations Plan being written. In some cases, seasonality or fish presence surveys are not completed prior to the public comment period. When this occurs, those streams are identified as unknown and called out within the sale specific Pre-Operations Report. An assumption is made based on LIDAR data to determine where a stream is likely to be protected with a riparian conservation area buffer. The intent of estimating stream buffers is to more accurately portray net acres for a timber sale from which harvest volume and value is calculated. When stream surveys are completed, stream locations, buffers and net acres on maps for the sale are modified to match what is present in the field. In addition, the FY24 sales and projects were set up and the Annual Operations Plan documents were prepared amidst ongoing policy and settlement agreement work and may not reflect the most current requirements. Sales and projects will be evaluated, and boundaries adjusted as needed prior to auction in order to be consistent with the most current rule sets.

Aquatic Anchors: Aquatic Anchor Sites are geographically identified watersheds where salmon and aquatic conservation is of particular concern. In these areas, additional riparian management strategies are implemented when conducting harvest operations. These strategies do not preclude or limit harvest or road building activities, but rather supplement existing riparian buffer protections to further bolster the conservation goals in these areas. The draft Habitat Conservation Plan conservation actions were

developed collaboratively with USFWS, NOAA, Department of Environmental Quality (DEQ), ODFW, etc. to provide for properly functioning aquatic systems. While working in these Aquatic Anchors, operations are set up under the current plans and policies and include the draft Habitat Conservation Plan requirements during this transitional stage.

Stream Enhancement: State Forests has been committed to implementing stream enhancement work on ODF-managed lands for more than two decades as a partner in the Oregon Plan for Salmon and Watersheds and in partnership with ODFW, local partners, and adjacent land managers. Stream enhancement, fish passage, and current riparian management area standards are designed to collectively improve processes and function of aquatic ecosystems over time, and ultimately benefit resident and anadromous aquatic-dependent species. Over the last 25 years, ODF has implemented many types of projects including over 200 in-stream projects across State Forests (an average of 8 projects per year) and provided over 7,618 trees (an average of over 300 trees per year) resulting in over 47 million dollars of in-kind contributions. Stream Enhancement Projects are tracked and reported yearly to the Oregon Watershed Restoration Inventory (OWRI), which is maintained by the Oregon Watershed Enhancement Board.

In order to focus stream enhancement efforts where they will have the most benefit, our staff aquatic and riparian specialist and fish biologist (specialist) utilize field review to develop stream enhancement projects, often in collaboration with ODF districts, ODFW, and local groups. Additionally, and when available, specialists access other local prioritization information such as Coho Strategic Action Plans, Rapid Bio-assessments, Watershed Assessments, etc. to inform where to focus efforts.

Where feasible, ODF aims to couple large wood placements and other stream enhancement projects in high priority stream reaches with the timing of an adjacent or nearby timber sale in order to maximize the benefits of onsite equipment, operators, and available trees. Models are a good first screening and initial prioritization tool; however, there are still several remaining factors to consider, including but not limited to: stream access, species and size of trees within harvest units, harvest mechanisms (i.e., ground or cable), and stream specific characteristics such as current wood loading amounts, valley configuration, gradient, stream size and power, nearby infrastructure, land ownership upstream/downstream, domestic water sources, etc.

Stream surveys occur as the timber sale is developed. At that time, foresters are prepared to discuss harvest methods, unit boundaries, and access, and the specialist (often accompanied by ODFW fish biologists) are able to assess stream conditions and make a determination as to whether stream enhancement is needed. Each year specialists review multiple potential stream enhancement opportunities – those that have a nearby timbers sale, as well as those proposed by local partners. Thus, it is important to manage capacity efficiently and focus on sales that aren't in preliminary stages, or that may be dropped from the Annual Operations Plan due to a number of potential factors.

If stream enhancement is recommended, the specialist will then identify the goals of the work and determine if the harvest methods, access, and stream conditions will allow for those goals to be achieved if the stream enhancement is coupled with the timber sale. If a stream enhancement project is recommended, the specialist will design the project (often in collaboration with ODFW biologists) for the district for inclusion as project work in the timber sale contract, or another implementation mechanism (e.g., partnership with ODFW and local groups).

Some stream enhancement projects fall out of the scope of what's reasonable to include as project work in a timber sale contract. Other high priority project locations are in areas where timber sales aren't planned. These projects are worked on collaboratively with local partners as capacity and funding allows.

ODF is working towards improving the timing of the stream enhancement planning process to provide more details in the Annual Operations Plan for the public to review in the future. As the transition into the requirements outlined in the draft Habitat Conservation Plan occurs, processes and reporting will change. In addition, ODF will begin working on new Implementation Plans for the Western Oregon State Forests Management Plan once it has been finalized. During the Implementation planning process, priority areas for stream enhancement will be evaluated and identified. There will be opportunities for the public to provide input regarding priorities during that process.

Wildlife: ODF currently has operational policies in place to protect both marbled murrelet and northern spotted owl nesting habitat. All operations are currently reviewed for potential habitat and surveyed as required until such time as Incidental Take Permits are issued and implemented by ODF. Forest managers will evaluate and determine the transition plan for the Threatened and Endangered survey program based on anticipated timing of the Incidental Take Permits issuance and contract commitments.

During the Habitat Conservation Plan process, ODF engaged a team of policy and technical experts and included public engagement in the development of the draft Habitat Conservation Plan terrestrial conservation strategy. Working collaboratively with the USFWS, ODF continues to ensure covered management activities are implemented in a manner that complies with ESA requirements. Management actions proposed in the draft Habitat Conservation Areas are intended to increase the quality and quantity of habitat for covered species including marbled murrelets and northern spotted owls. As such, stands already providing high quality habitat will require little to no management while stands with lower quality habitat will be managed more frequently to meet the intent of habitat enhancement within these areas.

ROADS, SLOPES, AND WATER QUALITY COMMENTS

- Concern on closing access to public lands on the Clatsop State Forests.
- Encourage ODF to prioritize hydrologic disconnection of forest roads on state forests and to include assessment efforts to disconnect roads from streams in future Annual Operation Plans.
- ODF should review district roads to develop plans to vacate or abandon certain roads to address water quality, habitat concerns, or hydrologic disconnection targets.
- Recommendation to utilize TerrainWorks or DOGAMI models to identify high hazard upland slopes in order to adequately buffer them to protect Coho Salmon Habitat and water quality.
- Encourage foresters to physically review Geotech recommendations to determine slope, inner gorge, and "unknown" stream restrictions prior to approving timber sales on all FY24 Sales.
- Commentor noted that some sales fail to buffer high hazard upland slopes with the potential to deliver to spawning and rearing streams for coho.
- Commentor noted that ODF is failing to meet the Coho settlement agreement to buffer all high hazard upland slopes.

- Question about seasonal timing of road construction and maintenance to mitigate sediment runoff.

Roads, Slopes, Water Quality Response:

Slopes: The Forest Management Plans and associated policies are designed to ensure forest resources are protected and that natural processes fundamental to healthy forests continue. Landslides are important natural geological processes, which introduce large wood and gravel into the stream network. Large wood and gravel inputs are critical to fish habitat, spawning and rearing. The Department evaluates every sale for landslide potential and buffers trees to provide for wood delivery to the stream network should a landslide occur. For FY 24, operations have been or will be reviewed under the existing Forest Management Plans, the draft Habitat Conservation Plan, the Forest Practices Act, and Coho Settlement Agreement requirements. These requirements provide robust aquatic and riparian buffer rules and include additional protection measures and tree retention for areas of potential unstable slopes such as inner gorges, initiation sites and their associated potential debris flow track reaches and high energy seasonal streams. In order to ensure that these requirements are met a combination of tactics may be used to evaluate operations including using landscape-wide slope stability models and site-by-site reviews in the field by a licensed geologist. ODF strives to complete geotechnical reviews prior to finalizing district Annual Operations Plans, however, some field consultations can't be completed prior to finalizing the Annual Operations Plans or are more effectively done during sale layout. Further unstable slopes noted by foresters are addressed prior to finalizing leave tree strategies and all geotechnical concerns are addressed prior to a timber sale being sold.

The FY24 sales and projects were set up and the Annual Operations Plan documents were prepared amidst ongoing policy and settlement agreement work and may not reflect the most current requirements. Sales and projects will be evaluated and boundaries adjusted as needed prior to auction in order to be consistent with the most current rule sets.

Roads: A well-maintained road system is necessary for a working forest and to provide the recreational access Oregonians increasingly demand. Road systems also provide access for fire response. ODF evaluates each timber sale and strives to build the minimum amount of roads required to provide access, except where ODF has identified road systems that can be moved away from existing streams to mitigate hydrological issues. This may result in more road miles, but relocating roads away from the stream network is beneficial for watershed processes. All planned road construction is reviewed by the geotechnical specialist to ensure that new roads are located in stable locations to provide the best protection to natural resources while meeting the operational objectives. Discussions are held regarding the long-term use of the road by ODF staff for reforestation and future management, and whether a road needs to be surfaced or if it can be left unsurfaced. Financial costs of the construction and long-term maintenance are considered as well as potential impact to sale operations, anticipated closures related to weather, and long-term impact to wildlife and recreation.

Hydrological connectivity surveys are performed on haul routes during sale layout. ODF prioritizes road improvement projects that address hydrologic connectivity and culvert replacements that are barriers to fish migration on active or planned haul routes and sites of opportunity near active or planned haul routes. As part of ongoing inventory work, ODF is continuing to document and resolve hydro-connectivity issues on the road network in order to meet the requirements in the draft Habitat

Conservation Plan, Coho Settlement Agreement, existing policies, and the Forests Practices Act. As we transition to include these additional requirements, processes and reporting will change and additional information will be included as required in future Annual Operations Plans.

Development of new roads, and improvements to existing roads will be accomplished in accordance with the goals and strategies in the Forest Management Plans and draft Habitat Conservation Plan, requirements in the Coho Settlement agreement, and the standards laid out in the Forest Roads Manual and NOAA Fisheries Fish Passage Design. In-water construction for roads and trails (e.g., stream crossings) will follow the established Oregon Guidelines for Timing of In-Water Work to Protect Fish and Wildlife to minimize impacts on aquatic species and their habitat. In the rare instance work needs to occur outside of the established work window, field staff will work with the aquatic specialist to obtain appropriate approvals. Road improvement and construction activities will be conducted during the dry season (April 1 through October 31). Outside of this period, ODF may allow construction through a written waiver during prolonged periods of dry weather. If heavy rain conditions occur, construction will be suspended. Soils that are saturated with water, that would become muddy when disturbed, and that have the potential to reach waters of the State, will be allowed to drain before construction resumes. If heavy rain conditions occur, erosion and sediment control measures will be implemented and reinforced to ensure no sediment has potential to reach streams.

Road maintenance investments are made to support forest operations, protect existing road infrastructure and water quality, and provide for safety improvements. ODF also closely monitors road conditions on active haul routes and performs additional patrols and assessments during and after inclement weather events. Additionally, ODF cooperates and coordinates with local watershed councils, as well as private and federal neighboring landowners, to improve road systems.

The purpose of vacating roads is to disconnect the road system hydrologically from the stream channels. Vacated forest roads will be left in a condition where road-related damage to the waters of the State is unlikely. When a road is to be vacated and taken off the active road network, erosion prevention work will be performed so that continued maintenance is not necessary. Vacated roads will have sidecast material, stream crossings, culverts, cross drains and fills removed; unstable road and landing fills excavated; ditch and road surfaces treated to disperse runoff and prevent surface erosion; and exposed soils revegetated. Segments of a road that have near-natural levels of risk for sediment delivery can be left intact and receive minimal road drainage improvements. Over the last 20+ years ODF has vacated or closed over 140 miles of road primarily to reduce sediment transport to the aquatic system. Where feasible, alternate routes were established in ridgetop locations, and some roads were no longer needed for forest-management activities. ODF will continue to review roads within and in proximity to sales within this Annual Operations Plan to identify sections that can be improved or vacated as the needs dictate.

Gate Installation/Public Land Access: Over the last several years ODF has seen a substantial increase in illegal dumping, abandoned vehicles and long-term camping. These behaviors create public safety problems, threaten environmental quality and are costly to mitigate, with high clean-up costs. As a last resort, ODF has the option to close roads to vehicular access if vandalism, neighbor concerns, or excessive road damage becomes a pervasive problem in particular areas. Road closures will at times limit vehicular access to targeted areas that have persistently presented problems and public education efforts have not curtailed these behaviors. While past Annual Operations Plans proposed several gates

in the Astoria and Tillamook Districts, this year there are no additional gates planned for within this Annual Operations Plan.

SANTIAM STATE FOREST COMMENTS

- Recommend excluding timber sales that would log complex, older forests on the Santiam State Forest that burned in the 2020 wildfires.
- Concern that logging after wildfire impacts wildlife and their habitats, sends dirt into streams, and sets back forest recovery into a healthy ecosystem, sometimes by decades.
- Several comments that natural areas will soon recover from fire, burned forests can act as carbon sinks, and if left unmanaged will develop into mature and old-growth forest twice faster and provide for carbon storage and habitat.
- Recommendation to follow the Governor's Climate Executive Order and preserve these older, burned forests for their role in carbon storage.
- Several comments that noted logging older burned forests will release much of their stored carbon, an unwise action at this juncture of the climate crisis.
- Concern that Northern spotted owl habitat on the forest may be destroyed by extensive post-fire logging.
- Recommendation to evaluate how the Santiam State Forest could contribute to healthy habitat and climate goals before moving forward with this plan.
- Several recommendations to protect wildlife and preserve all live trees, trees far from roads, and trees in well-loved recreation areas and along key tributaries to the Santiam River.
- One commentor noted that trees that are not hazardous are being cut and removed adjacent to roads that are along segments of the Santiam River that are designated Wild & Scenic Rivers and proposed Wild & Scenic River which is inconsistent with the protection requirements.
- Comment that as communities rebuild after this season's wildfires, there is a need to protect by leaving live trees standing, retaining fire killed trees for habitat and preserve the Santiam State Forest.
- Several commentors concerned that extensive cutting after the wildfires and increasing risk of landslides will damage drinking water supplies and public safety.
- Ensure that stand characteristics are confirmed with on the ground surveys especially in fire impacted areas where ODF reduced complexity estimates.
- It was noted that regeneration harvest post-fire results in a multi-decade "snag gap" and recommends that the agency should make snag habitat conservation and recruitment a priority.

Santiam State Forest Response:

The 2020 fires burned with variable intensity on the Santiam State Forest, creating a mosaic of forest conditions across the landscape including areas within the fire perimeter that didn't burn at all. Approximately 12,900 acres within the burn perimeter are considered moderate to severely burned. Approximately 16% of the moderate to severely burned acres were salvage harvested between fiscal years 2021 – 2023. These salvage areas were distributed across the district and all are less than 120 acres in size. All green trees and some snags were retained within those salvage areas. There are still large areas of snags with patches of green trees amongst them within the unmanaged moderate to severely burned stands. These areas will contribute to long-term snag recruitment. No salvage

harvesting of moderate to severely burned stands within the fire perimeters has been proposed within the North Cascade fiscal year 2024 Annual Operations Plan, however, there are a couple of salvage sales from previous Annual Operations Plans that are still active or about to be completed within the district.

A variety of management strategies and silvicultural treatments have been applied within the burn. Several monitoring studies are underway to evaluate these management choices. The monitoring will assess post-forest management activity responses of resources including but not limited to pollinators, soils, aquatic and riparian areas and wildlife habitat. Information from monitoring may be used to help inform future restoration strategies and response to catastrophic forest fires. Monitoring projects are being coordinated by ODF and several other cooperators such as ODFW, USGS, Oregon State University, and the NCASI to name a few.

For additional information about harvesting forests, recreation, and climate change refer to the corresponding sections in this document.

Stream protection: Streams were protected during salvage operations with current buffer requirements and additional no harvest areas based on site specific conditions. Strategies for stream protection during salvage on the Santiam State Forest were developed in collaboration with ODFW and DEQ. Work began in FY21 and continues into FY24 to underplant portions of the burned riparian areas with western red cedar, Douglas-fir, western hemlock and red alder trees. In addition, approximately 4,200 acres including riparian areas were aerially seeded to aid reforestation within moderate and severely burned portions of the forest.

Scenic waterway: All sales are screened during the planning process to determine if they are within a quarter mile of scenic waterways. If a harvest operation falls within this area, collaboration is done with Oregon Parks and Recreation to ensure the proposed management activity is developed to meet the requirements for these areas. There are no sales in the North Cascade District FY24 Annual Operations Plan that are within a quarter mile of a current scenic waterways or any proposed scenic waterways under the River Democracy Act.

Inventory: ODF has partnered with the United States Forest Service (USFS) and Bureau of Land Management (BLM) to develop Enhanced Forest Inventory for the fire affected areas in Fiscal Year 2024. When completed, this inventory will replace the estimated Stand Level Inventory currently being used in the fire impacted areas and the measured Stand Level Inventory in the non-fire impacted areas. In the meantime, all stands are reviewed on the ground during the planning process. This review includes confirming the current stand condition of the proposed harvest area.

PROCESS AND DOCUMENT IMPROVEMENT COMMENTS

- Within the Annual Operation Plan Summary document provide historical context for individual sales in the summary of timber sales by Basin Section.
- Note impassable roads on maps and in pre-operations reports.
- Recommendation that ODF should provide road density and maintenance needs per basin.
- Include directions within Pre-operation Reports to each proposed sale area.

- Recommendations to include timing information for road construction and maintenance, number of road miles that cross streams, and miles of road planned to be vacated prior to Annual Operation Plan approval in order to assess impacts to riparian habitat.
- Public Involvement should be simplified to encourage public comment especially to underserved and underrepresented groups. Consider creating a single webpage to direct people to that shows how all of the plans connect, what they generally accomplish and where people can engage in public comment and includes all the necessary materials to provide input.
- Recommendation to provide clarity about Aquatic Anchor buffers strategies in Annual Operation Plan.
- The pre-operation reports (pre-op) and the WebApp feature are very helpful for field review of draft Annual Operation Plans.
- Recommend adding a section in the Annual Operation Plans to address carbon storage plans. The tables in the Annual Operation Plan for proposed harvest in draft Habitat Conservation Areas only reflect primary sales and should also list alternate sales.
- Another commentor recommended to disclose the long-term loss of snag recruitment following a stand-replacing fire as well as commercial logging on the Santiam State Forest.
- Recommendation to provide information for sales in the draft Habitat Conservation Areas on how specific sales were selected including the current condition of the stands, why the prescribed logging is necessary to improve habitat, and intended prescriptions.
- A public tour should be implemented once marking is complete on draft Habitat Conservation Area stands.

Process and Document Response:

ODF strives to provide useful and detailed information during the Annual Operations Plan process for the public to review and provide feedback. This information is also intended to provide links to higher level Plans and processes. ODF constantly strives to improve the Annual Operations Plan documents and make them more useful and accessible by considering comments received and incorporating them where appropriate. For instance, following comments received during the FY23 Annual Operations Plan process, ODF removed almost all acronyms from the Annual Operations Plan summary documents to aid in comprehension of the plans. All the comments that target process and document improvements will be evaluated and considered for improvements during the FY25 Annual Operations Plan process.

OUT OF SCOPE COMMENTS

Comments that were out of scope that related to the draft Habitat Conservation Plan, new Forest Management Plan, grants, legislation, and other topics:

- Concern over lack of housing in Chemult.
- Support needed for implementation of Sunriver CWPP 2015.
- Fuel mitigation concerns on adjacent landowners.
- Comments on Oregon Wildfire Risk Maps.
- Request that the Cook Creek Watershed be designated as a Habitat Conservation Areas.
- Support for the proposed Habitat Conservation Plan.

- Disappointment in implementation of the draft Habitat Conservation Plan prior to completion of federal review and/or adoption by the Board of Forestry.
- Restricting thinning operations into draft Habitat Conservation Plan stream buffers will do a disservice to habitat. It limits growth of softwoods in buffers and hardwood establishment, resulting in less species diversity.
- ODF should provide analysis that demonstrates the riparian buffers are sufficient to protect and restore the covered salmonid species.
- The increase in thinning operations due to oversized Habitat Conservation Areas (HCA) will be limited to contractor availability. Contractors can't use the same equipment to thin as they do for clearcut harvesting (yarding or ground based) and very few operators specifically specialize in thinning. Project work for thinning sales will also drive prices down. ODF and taxing districts can expect to get less revenue overall due to increased thinning sales if the draft Habitat Conservation Plan is approved as is.
- Annual Operation Plans appear to be inconsistent with draft Forest Management Plan goals and strategies.
- Recommendation that the Habitat Conservation plan to include all areas identified by a scientifically supported process for identifying and buffering high hazard upland slopes.
- Recommendation for BOF and ODF to make changes to the draft HCP to increase harvest levels before final adoption instead of adding alternate sales to the FY24 primaries.

DISTRICT SPECIFIC CHANGES

The following is a summary of changes that have been made to FY24 Annual Operations Plan documents based on the feedback that was received and new information that we have learned:

Astoria District

Annual Operation Reports:

- Geotechnical information was updated on the following sales:
 - Hawkins and Middle Cole
- Boundary Modifications on the following sales:
 - Middle Cole
- Species, Volume, Value, or logging percentage adjustments on the following sales:
 - Hawkins; Kingsmen; and Middle Cole
- Project cost adjustments (Primarily updating haul costs) on the following sales:
 - D.R. Chopper; Ebsen Jarvie Thin; Humpty's Wall; Lusignan; Middle Cole; Mill Shack; ODR; Shingle Knob; East Micro; and Wild Gander.
- Updated fish survey information and seasonal vs perennial language in all reports and maps
- Other Resource Considerations edits
 - Ebsen Jarvie Thin

Summary Tables:

- Table A1: Updated project costs, volume, value, and acreage numbers.
- Table A2: Updated Kingsmen Landscape Design to show sale has a Desired Future Condition of non-complex. Updated Geotech review for Middle Cole.
- Table A3: Updated project costs

Summary Document:

- The Summary Document has been updated to reflect the changes listed above.
- Added Pre-Commercial Thinning operations to Young Stand Management
- Updated Recreation Project list to include Nicolai OHV bridge replacements

Misc:

- Minor grammatical edits to Pre-Operations Reports, maps, Summary Tables, and Summary Document

Forest Grove District

Primary/Alternate Changes:

- Nine Iron moved from Primary to Alternate.
- CE Junction moved from Alternate to Primary.

Annual Operation Reports:

- Stream buffers were updated for the following sales:
 - Cry Wolf; Nine Iron; Rock Music; Run Duo; Sunday Best; Saddle Time; Trifecta; and Triple Crown. These changes were also reflected in the maps.
- Geotechnical information was updated on the following sales:
 - Cry Wolf, NW Slope; Sunday Best; Trifecta; Rock Music; Rodger Dodger; Saddle Time; and Sunday Prime. Where appropriate these changes were reflected in the maps.
- Road Construction was adjusted on the following sales:
 - NW Slope and Nine Iron
- Clear Connection: Map updated to show accurate Status of existing roads.
- Triple Crown: Map updated to remove vacated roads in the vicinity of the sale units.
- Bible Creek: Map updated to show acres designated as Green Tree Retention from a previous adjacent sale.

Summary Tables:

- Table A1: Updated project costs, volume, value, and acreage numbers due to changes listed above.
- Table A2: Updated Nine Iron Landscape Design to show sale has a Desired Future Condition of non-complex.
- Table A3: Updated project miles and costs

Summary Document

- The Summary Document has been updated to reflect the changes listed above.

Misc:

- Minor grammatical edits to Pre-Operations Reports, maps, Summary Tables, and Summary Document

Klamath Lake District:

- Minor grammatical edits to Pre-Operations Reports, maps, Summary Tables, and Summary Document

North Cascade District:

Summary Tables:

- Table A1: Updated project costs, and value numbers.
- Table A3: Updated Work Order Contracts to include a hold over project from FY23.

Misc:

- Minor grammatical edits to Pre-Operations Reports, maps, Summary Tables, and Summary Document

Tillamook District:

Primary/Alternate Changes

- Clear Creek was moved from Alternate to Primary

Annual Operation Reports:

- Stream Buffers were updated on the following sales:
 - Elk Bugle, King of Diamonds, and Simmon’s Spur
- Haul Route Condition Updated on the following sales
 - Tin Pants
- Geotechnical information was updated on all sales that have not had a geotechnical review completed yet detailing that they will be reviewed prior to sale layout.
- Wildlife and Species Considerations updated on the following Sales
 - Elk Bugle

Summary Tables:

- Table A1: Updated volume, value, and acreage numbers due to changes listed above.

Summary Document:

- The Summary Document has been updated to reflect the changes listed above.

Misc:

- Minor grammatical edits to Pre-Operations Reports, maps, Summary Tables, and Summary Document

West Oregon District:

Annual Operation Reports:

- Geotechnical information was updated on the following sales
 - Bon Voyage; Old Highway; and Double Exposure

- Haul Route Condition Updated on the following sales
 - Millers Woods Thin
- Boundary Modifications on the following Sales
 - Double Exposure

Summary Tables:

- Table A1: Updated project costs, value, and acreage numbers.
- Table A3: Updated project miles and costs

Summary Document:

- The Summary Document has been updated to reflect the changes listed above.

Misc:

- Minor grammatical edits to Pre-Operations Reports, maps, Summary Tables, and Summary Document

Western Lane District:

Annual Operation Reports:

- Added a 4 acre green tree retention area and updated stream buffers to the Son-In-Law sale. These adjustments did not result in a change in gross or net acres for the sale.

Summary Document:

- Updated Land Surveying Needs section, removed language regarding land surveying needs for Son-In-Law to be determined. Further field review has shown that no land surveys are needed.

Misc:

- Minor grammatical edits to Pre-Operations Reports, maps, Summary Tables, and Summary Document