

ODF State Forests

2025 Implementation Plan Revisions

Public Comment Summary

Public Involvement and Summary of Changes:

In order to engage with Oregonians, the Oregon Department of Forestry's (ODF) Implementation Plan revisions for the Astoria, Forest Grove, North Cascade, Tillamook, West Oregon and Western Lane districts had a 30-day public comment period, which began February 20, 2025. 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 & X platforms.

The purpose of the Public Comment Period was to provide an opportunity for the public to review the revised Implementation Plan, ask questions, make recommendations, and offer comments. As a public agency, ODF strives to operate in the best interest of Oregonians. We provide opportunities for public participation to assist us in securing the greatest permanent value from State Forests for all Oregonians.

In all, ODF received 28 individual written letters related to the Implementation Plan revisions for the Astoria, Forest Grove, North Cascade, Tillamook, West Oregon and Western Lane districts. Each comment received was reviewed and the feedback considered through the lens of aligning with State Forests current plans and policies. Changes to the Implementation Plans that were a result from comments received are detailed in the Implementation Plans and at the end of this document.

IMPLEMENTATION PLAN COMMENTS

Comments related to the Implementation Plan revisions include:

- *Support the inclusion of the requirements of the draft Habitat Conservation Plan in the proposed Implementation Plans. (multiple)*
- *Commend the realignment of Terrestrial Anchors with Habitat Conservation Areas, which allows for more efficient use of available acreage.*
- *It is premature to Implement draft Habitat Conservation Plan measures before the issuance of the Incidental Take Permits and final approval of the plan creates significant uncertainty and operational limitations.*
- *Evaluate the inclusion of additional landscape design targets and expansion of complex stand structures and consider a more balanced approach to forest structure development that allows for both ecological diversity and sustainable timber production. (multiple)*
- *The alignment of Terrestrial Anchors with Habitat Conservation Areas reflects a better balance between conservation goals and timber production.*
- *Supports the changes intended to alleviate unnecessary constraints. (multiple)*
- *Support the revisions to the Terrestrial Anchors and certain desired future condition stands as this will help better achieve Greatest Permanent Value at this time.*

- *Appreciates the need to align the draft Habitat Conservation Plan and the constraints of the current Forest Management Plan, in light of the extended timelines for the Habitat Conservation Plan, as a necessary step in order to avoid needless redundancies and burdensome process.*
- *Opposed to decision to implement the Habitat Conservation Plan prior to having Incidental Take Permits from the federal services.*
- *Supports these modest revisions intended to alleviate unnecessary constraints.*
- *Supportive of the revisions to Terrestrial Anchors and certain desired future condition stands.*
- *Appreciate the time and considerations made by ODF staff while drafting these Implementation Plans, and generally support the revisions that have been made.*
- *Concern that short-term Implementation Plans are needed again because the timelines keep getting extended to finalize the draft Habitat Conservation Plan and companion Forest Management Plan.*
- *These Implementation Plans should maximize the economic and ecological potential of Oregon's State Forest.*
- *Further adjustments are needed to the Implementation Plan to ensure that timber harvest levels align with operational needs and environmental goals.*
- *Aligning the Terrestrial Anchors and desired future condition with the Habitat Conservation Areas should have been done at the outset of designing the Habitat Conservation Areas within the draft Habitat Conservation Plan.*
- *Supports the alignment of the desired future condition and the Habitat Conservation Areas in order to meet harvest goals in the short term.*
- *Recommend that final plans support long-term health of Oregon's forests, the economic viability of rural communities, and the well-being of all Oregonians.*
- *Support these Implementation Plans as they are a first step in balancing management and durable conservation measures to achieve Greatest Permanent Value.*
- *Support efforts to protect Species of Concern, but are concerned with the operational impact of these extended protections.*
- *Concern that additional buffer zones and seasonal restrictions used to protect Species of Concern exceed federal requirements.*

IMPLEMENTATION PLAN RESPONSE:

At the direction of the Board of Forestry, ODF is continuing the development of a draft Western Oregon State Forests Habitat Conservation Plan and new Forest Management Plan for Western Oregon State Forests. At the time of developing the revised Implementation Plans, the Habitat Conservation Plan is a formal public draft document with an accompanying draft Environmental Impact Statement in the federal National Environmental Policy Act process. Finalization of the Environmental Impact Statement and Biological Opinions, and issuance of Incidental Take Permits is expected to occur within 2026. In order to continue this process the Implementation Plans must include all of the components of the draft Habitat Conservation Plan in order to cover the expected Habitat Conservation Plan approval timeline. Some adjustments were made to align the goals and strategies of the current Forest Management Plans where possible with the Habitat Conservation Plan goals and objectives, which helps forest management be more focused, efficient, and effective. The alignment of the desired future condition locations and the Terrestrial Anchor sites with the Habitat Conservation Areas is the next step in this transition

process. The Habitat Conservation Areas were designed by ODF biologists using species occurrence data, and contain the majority of complex, older, and high-quality habitat on each district. As this process evolves ODF will evaluate new information or changes in direction after they occur to determine if adjustments need to be made.

FOREST MANAGEMENT COMMENTS

Comments related to Forest Management on State Forests include:

- *Appreciate ODF's thoughtful approach to managing these public lands and encourage continued efforts to balance recreation, conservation, and economic sustainability.*
- *Ban clearcutting on State Forest and transition to selective cut harvesting using non-invasive methods such as helicopters and horses to protect the ecosystem, eliminate road building, and leave the most mature trees intact.*
- *People depend not only on predictable timber supply, but also on a steady flow of diverse contracts for reforestation, thinning, fuels mitigation, roadwork, planting, and prescribed fire.*
- *Understand that a Habitat Conservation Plan is, by very definition, a document centered on habitat conservation, it is imperative that staff work to compensate for this imbalance.*
- *The three pillars of Greatest Permanent Value must be rebalanced to the extent possible given these new, extremely robust and impactful constraints.*
- *Concerned regarding the lack of balance afforded in the current Forest Management Plan and the draft Habitat Conservation Plan.*
- *Appreciate the department's commitment to managing our State Forests for recreation, conservation, and economic sustainability.*
- *Concern that Greatest Permanent Value is unbalanced with focus on environmental interests at the expense of economic and social considerations.*
- *Livelihoods depend on stable and predictable flow of diverse forestry work across these public forests.*
- *The Department and the Board have been hyper focused on creating environmental protections these past several years, while far less attention and energy have been afforded to economic and social outcomes.*
- *Trees right to the edge of someone's residential property should not be cut.*
- *Appreciate the complexity of managing public forests, balancing diverse uses, and addressing the competing demands on these valuable landscapes.*
- *Opposed to clearcutting and spraying.*
- *Implement additional measures to restore complex layered forest stands into the landscape.*
- *Protect mature stands.*
- *Recommendation to implement additional measures to restore complex layered forest stands into the landscape, protect mature stands of forest, and implement the Climate Plan.*
- *Concern that ODF is not meeting the goal of 30% of forests in complex structure as there is currently only 13% in Layered structure on the North Coast Districts and 2% of that is Older Forest Structure.*
- *Recommend no harvest of mature healthy stands over 90 years old.*

- *Supports the move to fixed harvest targets at the higher end of the previous volume range. (multiple)*
- *Recommend reducing harvest targets in order to meet Forest Management Plan structure targets for Layered and Older Forest Structures across the landscape and to make up for overharvesting and to address the anticipated reduction in growth and yield resulting from climate change.*
- *Implementing the Habitat Conservation Plan before having Incidental Take Permits while also implementing the current Forest Management Plan has needlessly resulted in lower acres available for harvest.*
- *Recommendation to increase harvest levels. (multiple)*
- *Recommendation to reduce harvest of complex stands to address past overharvesting.*
- *Concern that State Forests have been and continue to be overharvested at the expense of age distribution and structural and species diversity due to overly optimistic modeling and effects of climate change.*
- *The unburned portion of the Santiam State Forest should be intensively managed to produce an annual harvest volume of 17.5 million board feet to protect the remaining infrastructure to manage land going forward.*
- *Recommendation to include additional volume to ease the transition of the draft Habitat Conservation Plan as per the 2023 State Forester letter.*
- *Recognize these Implementation Plans attempt to restore balanced management but don't address past imbalance that prioritized timber harvest.*
- *Harvest to the maximum amount allowed within the Habitat Conservation Areas. (multiple)*
- *Support for the move to fixed harvest targets. (multiple)*
- *Harvest levels should be reduced in order to achieve the desired future condition targets and make up for overharvesting in the past.*
- *Concerned about the low level of harvest inside of the Habitat Conservation Areas.*
- *Concerned that moving the desired future condition into the Habitat Conservation Areas may reduce the harvest in these areas in the short term.*

FOREST MANAGEMENT RESPONSE:

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

Greatest Permanent Value provides the foundation on which forest management plans are developed and provides the framework for how State Forests are managed. Forest management plans identify the resource goals and strategies intended to achieve an appropriate blend of resources using the best available science. The Board of Forestry is responsible for reviewing and approving forest management plans to ensure the plan will secure the Greatest Permanent Value for Oregonians. The Northwest and Southwest State Forests Management Plans provide direction for these Implementation Plans. While the Forest Management Plans set certain management standards, primarily associated with resource

protection, there are many instances where different management options may achieve Forest Management Plan goals and Implementation Plan objectives.

Operational policies guide decisions within this range of options by defining specific procedures and best management practices that allow for management flexibility, while ensuring sound management, resource protection, and compliance with required laws.

These Implementation Plans describe the management approaches and activities designed to achieve the Forest Management Plan goals and the draft Habitat Conservation Plan goals and objectives. 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 using a variety of silvicultural prescriptions and tools.

Complex/Mature Forest Management: As described in the Implementation Plans, ODF does harvest complex older mature stands not included in the mapped landscape design for desired future condition complex stands or the Habitat Conservation Areas and will plan harvests in areas where the desired future condition has been changed. This decision was made in order to balance continued implementation of the current Forest Management Plans and honor the process of developing and implementing the draft Habitat Conservation Plan, while still meeting the harvest objectives within the Implementations Plans. The Implementation plans identify the targets for areas designated for complex structures that will be developed over the long term. The timeline to meet these targets is also outlined in each district's Implementation Plan. Areas designated as desired future condition complex and areas that have been designated as Habitat Conservation Areas have been identified as the highest priority locations where older trees and complex stands will be grown over time. Harvest of mature stands outside of these prioritized areas ensures that other aspects of Greatest Permanent Value and Implementation Plan objectives are being met while allowing younger stands to grow older and more complex in a sustainable matter.

Harvest Levels: Harvest levels were determined when the district Implementation Plans were revised in 2023 by modeling the requirements in the Forest Management Plans, draft Habitat Conservation Plan, operational policies, and current conditions. This modeling removed the rules for Terrestrial Anchor sites and the areas of desired future condition complex after the first period (5 years) with the assumption that the draft Habitat Conservation Plan and the draft Western Oregon Forest Management plan would be approved. As Terrestrial Anchors, desired future condition complex areas and Habitat Conservation Areas have similar objectives and allowed management activities, alignment of these areas are reflected in the harvest targets identified in each Implementation Plan. In addition, the model included current forest conditions and stand ages which reflect past management decisions, natural disturbances and forest growth to calculate sustainable harvest levels. At times direction can be given to harvest at higher or lower levels to provide flexibility for a variety of scenarios such as market conditions or natural disturbances. Harvest modeling is conducted as needed to support policy and implementation decisions, analyze forest management approaches, update current forest conditions and recalibrate sustainable harvest outputs.

The majority of the harvested volume will come from lands outside of designated Habitat Conservation Areas, Riparian Conservation Areas, no harvest wildlife areas, forested areas that are inoperable, scattered remnant old growth trees, recreation and scenic areas. These lands are primarily managed for

economic benefits but will contribute to other resource values. Some volume will result from habitat restoration or improvement projects within Habitat Conservation Areas.

Timing of harvest in the current Forest Management Plans or the Draft Habitat Conservation Plan is not set at a specific age, but rather is a product of stand condition, stand health, and annual harvest objectives. Areas designated as desired future condition complex and areas that have been designated as Habitat Conservation Areas have been identified as the highest priority for wildlife habitat across the landscape 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 Greatest Permanent Value and Implementation Plan objectives are being met while allowing younger stands to grow older and more complex in a sustainable matter.

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

FOREST HEALTH COMMENTS

Comment received related to insect and disease management:

- *Restore areas impacted by insect pests and diseases to productive forests through removal of susceptible species and use of site appropriate species.*
- *Prioritize converting unproductive stands into healthy conifer stands like some hardwood stands, stands affected by Swiss needle cast and *Phellinus weirii* to increase carbon sequestration, improve forest health and wildlife habitat, and increase timber volume.*
- *Support prioritizing treatment of unproductive stands such as those affected by Swiss needle cast and laminated root rot to ensure long-term sustainability of State Forests.*
- *ODF should work with federal partners in the Wildland Urban Interface to create fire resilient landscapes.*
- *Please continue to rehabilitate and replant the Santiam State Forest for future generations' benefit.*
- *Pockets of old growth ponderosa pine in the Shady Cove area are being encroached upon due to the disrupted natural fire cycle.*

- *The forest structure of the Shady Cove parcels is declining from beetle, drought, and overstocking of trees and brush components.*
- *Active forest management of the Shady Cove parcels is needed for fire mitigation.*
- *The Shady Cove parcels need fuel reduction work planned out and started immediately to protect forests and infrastructure such as cell towers on adjacent lands.*
- *Insect mortality is in an advanced stage and these forests in the Shady Cove parcels are converting to hardwood stands with a very limited merchantable component.*
- *The Shady Cove parcels are within a 3-mile radius ember fallout zone from our communities.*
- *Concern that the State of Oregon is directing liability and responsibility for wildfires on homeowners by not managing and increasing restrictions.*

FOREST HEALTH RESPONSE:

Managing for diverse, healthy, sustainable and resilient forests is utilized as the primary approach to prevent and mitigate insect, disease, and abiotic forest threats such as wildfire. Active management to improve forest health in conjunction with conservation will not only promote biodiversity and address issues such as insects and disease, it will also help mitigate future fire risk. Current forest health strategies are addressed through site specific mitigation to restore areas impacted by insects, diseases such as Swiss needle cast and laminated root rot. Site specific harvest and young stand management prescriptions consider target species mix, aspect, elevation, soil types, Swiss needle cast risk where applicable, *Phellinus weirii* (laminated root rot) presence, wildfire risk, required stocking guidelines, natural advanced regeneration, and the desired future condition of the stand.

Forest health surveys and monitoring help to identify areas to evaluate for insect, disease and other forest health issues. Areas identified for treatment or rehabilitation are gradually incorporated into the Annual Operations Plan due to the high cost of the rehabilitation of these areas. ODF is looking into partnerships and alternate funding such as grants to help defer some of the cost to rehabilitate these areas and work efficiently and effectively near ownership boundaries where applicable.

WILDLIFE COMMENTS

Comments received on wildlife include:

- *Species of Concern strategies should be based on sound science, ensuring that they align with both the biological needs of the species and the practical realities of forest management.*
- *Recommend that ODF consult with forest operators and wildlife experts to refine the species of concern strategies and minimize operational disruptions.*
- *All older stands in the Santiam, especially near areas impacted by the Beachie Creek fire, should be retained to ensure availability of suitable habitat for spotted owls and other species dependent on mature forests.*
- *Recommendation to protect fungi and wildlife as we all are all interconnected.*
- *Concerned that existing Terrestrial Anchors in the North Cascade District will be eliminated and exchanged for burned-over stands within Habitat Conservation Areas.*

- *Recommendation to retain existing Terrestrial Anchor locations pending further analysis of the impacts to listed species.*

WILDLIFE AND AQUATIC RESPONSE:

State Forests provide habitats for a wide variety of native wildlife, fish, amphibians, fungi, and plant species across the landscape. A combination of strategies are used to address habitat needs including: the use of silvicultural tools to attain an array of forest stand structures and habitat types across the landscape; development of key structural components such as snags, green trees, and down wood; riparian and aquatic management standards, stream restoration projects, and upslope components such as road and slope stability strategies; and site-specific plans such as modified harvest prescriptions or practices, seasonal restrictions, site specific actions such as leaving slash piles, buffers, and resource site protection.

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

The Terrestrial Anchor in the North Cascade District was not adjusted during the Implementation Plan revisions. This anchor was already located within a Habitat Conservation Area. The primary species of concern expected to benefit from the Terrestrial Anchor in the North Cascade District are species associated with high elevation ponds, lakes, wetlands, and talus slopes. Although the Terrestrial Anchor is located within a portion of the district that was burned, the habitat for the targeted species was not degraded to the point that it has become unusable. This burn area will continue to contribute to habitat complexity over time within the Terrestrial Anchor as new growth and key structural components, such as snags and downed wood, increase the availability of food and cover sources for the targeted species.

CARBON/CLIMATE COMMENTS

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

- *Prioritize climate-informed forest principles and practices such as longer rotations and passive management that align with the draft Habitat Conservation Plan.*
- *Consider the option of carbon credits for sensitive areas to help mitigate climate change and maintain revenue flow.*
- *Recommend setting an internal carbon pricing process to guide planning decisions.*

- *Cutting of mature trees 80-years and older is not in alignment with climate smart forestry as these trees are the best sequesters of carbon.*
- *Support emphasizing that active forest management – including thinning, regeneration, and reforestation – supports climate goals by increasing carbon sequestration and forest health.*
- *Appreciate the recognition of the contribution of forest products in climate change and carbon storage conversations.*
- *Focus on the role of forest products in addressing climate change is an important step in reinforcing the ecological value of sustainability manage forests.*
- *Appreciate the notion that ODF is already managing State Forests in a way that is climate-friendly.*
- *Appreciate the recognition of harvested wood products as a way to store carbon and that seedlings will accumulate carbon as they grow from regenerated stands.*
- *Recommend identification of areas to increase soil carbon and maintain forest carbon in stands post-harvest.*
- *The public needs to understand that a majority of state forestland has been set aside under the draft Habitat Conservation Plan and that they will be contributing to carbon sequestration and storage in perpetuity.*
- *Implement the Climate Plan.*
- *Because of these massive commitments of the Habitat Conservation Areas, there is no need for additional carbon storage "on the stump" in areas otherwise available for timber harvests.*
- *Recommend identification of areas that have high carbon storage potential and establish priorities for these areas that include long-term carbon storage.*
- *Support the recognition that harvested wood products contribute to carbon sequestration and that carbon storage is not limited to "on-the-stump" retention.*
- *No clearcutting and very limited thinning for the purposes of carbon sequestration.*
- *Recommend harvest rotations that increase carbon.*
- *Support the inclusion of the Climate Change and Carbon section in the interim Implementation Plans they need to include the Goals and Strategies of the Climate Change and Carbon Plan. (Multiple)*
- *Recommendation to follow Climate Change and Carbon Plan to incorporate specific management climate mitigation and adaption practices.*
- *Forest products serve a vital role locally and worldwide in alleviating carbon emissions both through long-term storage as well as reducing the impacts from less sustainable alternatives.*
- *Recommend identification and conservation of areas particularly susceptible to the deleterious effects of climate change.*
- *Implement all aspects of the Climate Change and Carbon Plan by establishing longer rotations on lands outside of the Habitat Conservation Areas and developing a carbon market system, to establish ODF as a national leader in climate-smart forest practices.*
- *Recommend that improvements to carbon storage should be above Endangered Species Act compliance levels to become a national leader.*

CARBON/CLIMATE RESPONSE:

State Forests are currently managed to provide for a diverse, healthy, productive, and sustainable forest ecosystem over time that will be more resilient to climate change. While many of the goals and practices

outlined in the Climate Change and Carbon Plan are currently being implemented, some higher level topics like harvest rotation age outside of Habitat Conservation Areas and carbon pricing/carbon credits are still being considered by the BOF. BOF direction will be incorporated into the draft Western Oregon Forest Management Plan and associated Implementation Plans. This process is currently underway but in the short-term has left a transition period until those plans are finalized and adopted. During this transition period the majority of the goals and supporting actions identified for State Forests in the ODF Climate Change and Carbon Plan are met through implementing the current Forest Management Plans and incorporating the draft Habitat Conservation Plan.

As outlined in these Implementation Plans, the goals and supporting actions of the Climate Change and Carbon Plan will be implemented in multiple ways including: landscape-level habitat protections and legacy structures (i.e., old growth, green trees, snags, down wood) within harvest units that store carbon in standing trees; carbon stored in harvested wood products; silvicultural systems and prescriptions such as planting multiple tree species, utilizing varied planting spacings and densities; and addressing forest health issues such as insects and disease to provide for a diverse, healthy, sustainable and resilient forest ecosystem over time.

RECREATION, EDUCATION AND INTERPRETATION COMMENTS

Comments received around public engagement in recreation development include:

- *Opposed to the use of any class of e-bike on non-motorized trails.*
- *E-bikes should only be allowed in motorized recreation areas.*
- *Recommend the REI program focus resources on the Master Planning process for the Tillamook and Forest Grove district instead of focusing on maintaining existing facilities.*
- *Recommend focusing on altering the recreation direction rather than continuing business as usual.*
- *The current draft Implementation Plans should be revised from focusing on maintaining existing recreation facilities to include supporting new opportunities like the Salmonberry Trail as this aligns with ODF's strategic goals and ensures that future recreation planning meets community needs.*
- *Recommendation to prioritize the Salmonberry Trail in future recreation planning. (multiple)*
- *ODF's long-term vision should support the Salmonberry Trail as well as adjacent new hiking trails that could use the Salmonberry Trail to provide trailhead access.*
- *Support a planning process that integrates the Salmonberry Trail with the current ODF Recreation program and Recreation Plan. (multiple)*
- *Concern that Western Oregon is lacking in dedicated bike/hiking trails.*
- *Thoughtful integration with the Salmonberry Trail will maximize the value of Tillamook State Forest's recreation assets and ODF's mission of enhancing social, economic, and community values.*
- *Recommend prioritizing the Salmonberry Trail planning and opening which will align with ODF's mission and will support future fundraising.*
- *A well-structured funding model that supports all recreation in Northwest Oregon can be best developed when recreation resources are integrated and cross-ownership and land managers work together.*
- *Participation in the Salmonberry Trail project will help ODF collaborate with regional partners on sustainable recreation funding and long-term planning. (multiple)*

- *The Salmonberry Trail will support economic development and tourism in Tillamook and Washington Counties and help restore natural habitat and appreciation of the environment. (multiple)*
- *Recommends taking advantage of opportunities to educate, help local economies, and work with other organizations in order to support future generations (multiple)*
- *The Salmonberry Trail project has gained the support of local governments including Tillamook and Washington Counties and cities, outdoor enthusiasts, and conservation groups.*
- *A funding model that supports all recreation in Northwest Oregon can be best developed when recreation resources are integrated and cross-ownership land managers work together.*
- *The Salmonberry Trail project link between all the recreation providers, and being well-integrated together can best position the NW to develop a model that supports everyone and show integration across land ownership and managers.*
- *The Salmonberry Trail proposal directly connects underserved communities in Tillamook, Cornelius, Forest Grove, and the greater Portland metro area, enhancing community equity and access. (multiple)*
- *The Salmonberry Trail is needed to provide an area to bike safely as roads have become more congested with vehicle traffic.*
- *Support sustainable recreation by creating the Salmonberry Trail into a world class trail that connects urban and rural Oregon, draws people from all over the world and provides education opportunities to Oregonians. (multiple)*
- *The Salmonberry Trail would be a long-term investment, but it will be an incredible asset on-par with the Columbia Gorge trails and lasting legacy for the State of Oregon. (multiple)*
- *The Salmonberry Trail would run through ODF-managed lands and presents a once-in-a-generation opportunity to expand access to public lands, connect communities, build a through route to the coast, and enhance conservation efforts. (multiple)*
- *The Salmonberry Trail aligns with ODF's mission to provide outdoor recreation and education opportunities in our State Forests. (multiple)*
- *The Salmonberry trail could be a piece of history which tells the story of Indigenous Peoples, settlement and expansion in the coastal mountains, and the history of historical fires.*
- *The Salmonberry Trail could educate future generations about recreational activities, such as fishing and hunting, plus how these are accomplished to benefit wildlife and fisheries.*
- *The Salmonberry Trail would enhance outdoor recreation and educational opportunities for Oregonians such as another model for Outdoor School or a Salmonberry History/Environmental Center. (multiple)*
- *The Salmonberry Trail could be a teaching environment for all things biological and a resource to teach students about careers in natural resources, forestry, agriculture and more.*
- *Imagine a learning center where students as well as adults come from all over the world to study the forests, streams and resources along the Salmonberry Trail.*
- *The Salmonberry Trail project would improve habitat restoration for fish, wildlife and forests by removing or mitigating railroad infrastructure in the Salmonberry River. (multiple)*
- *The Salmonberry Trail would lead to conservation of the local lands to maintain their natural habitats.*
- *The Salmonberry Trail project would enhance habitat restoration efforts for fish, beavers, and other wildlife along the Salmonberry and Nehalem Rivers.*

RECREATION, EDUCATION AND INTERPRETATION RESPONSE:

Recreation Planning: The ODF Recreation Program is undertaking a largescale planning process, that will be reflected in plans and policies governing the program's work. The program will focus on improving current facilities, trails, and operational procedures, while also addressing needs associated with emerging trends in recreational use and other recreational development in areas surrounding State Forest land. Among the many factors to be considered are projected staffing and funding levels, recent usage patterns of different groups, and the ability to provide uninterrupted recreational access during other forest management activities.

Funding: Similar to other public agencies managing recreation, it is extremely important to be cost-effective and develop a strong funding model with a diverse structure. Currently, ODF's Recreation Program has a funding structure built on timber sale revenue, ATV permit disbursements, and internal program revenue from campgrounds and other rentals. Moving forward, the program will continue to look for additional opportunities to expand the funding base through partnerships with other recreation providers, sponsorships with local companies, increasing internal revenue opportunities, and working with the program's supporting non-profit, the State Forests Trust of Oregon.

Salmonberry Trail: Since its creation, ODF has been a member of the Salmonberry Trail Intergovernmental Agency (STIA). As a STIA member, ODF is aware of the work taking place to advance planning for the trail's next phase of development and will continue to be at the table during all discussions regarding future work. Being the land manager with the largest ownership adjacent to the proposed trail, the agency has an interest in ensuring that trail development is congruous with other ODF management objectives, such as fire protection, natural resource protection, and ODF's own recreational plans and operations.

On the ground, ODF is focused on completing work on the Wilson River Trail, a nearly 40-mile-long trail that will connect ODF's westernmost campground (Keenig Creek Campground) and easternmost campground (Reehers Camp Campground) when complete. All told, the connection will allow hikers, bikers, and equestrian users to travel nearly the entire Tillamook State Forest, while passing through six of the program's campgrounds and many different forest habitats and management strategies.

E-Bikes: As with any new or developing technology, ODF's Recreation Program is working with our land managing partners to develop consistent policies to properly address the usage of e-bikes on State Forest land. Currently, Oregon Parks and Recreation Department, our closest partner for recreation management in Oregon, is reviewing comments from their re-examination of e-bike regulations and will be providing an agency recommendation in the coming months. ODF will review their recommendation and move forward with internal rulemaking for trails managed by the department across its State Forests.

ROADS COMMENTS

Comments around public access and new road construction include:

- *Access should be maintained for recreation and fire protection.*

- *Road-building and clearcut timber harvest on steep slopes above salmon-bearing streams must be avoided or risk violating the Endangered Species Act.*
- *Recommend no new road building within Riparian Conservation Areas and Habitat Conservation Areas.*
- *In 2024 new roads were proposed within Habitat Conservation Areas and Riparian Conservation Areas which is likely inconsistent with the Habitat Conservation Plan and long-term covered species protection.*
- *Recommendation to decommission roads in Habitat Conservation Areas rather than constructing new roads that don't add to conservation.*
- *Concern that too many roads are being built on State Forests and are causing landslides that adversely affect salmon habitat.*

ROADS RESPONSE:

Roads: A well-maintained road system is necessary to ensure resource protections, fire protection, and public access. The road system on State Forest lands is managed to keep as much forest land in a natural, productive condition as possible while limiting impacts to resources in accordance with the Oregon Forest Practices Act and other applicable laws, current Forest Management Plans, draft Habitat Conservation Plan (where applicable), ODF guidance, and best management practices. The draft Habitat Conservation Plan does not prohibit road building inside Habitat Conservation Areas. Road construction in Habitat Conservation Areas will occur where economically or operationally feasible options outside of Habitat Conservation Areas are not available, or to support management activities within them. Road construction within Riparian Conservation Areas is limited to where upland road placement options don't exist, are infeasible or cost prohibitive. Road design specifications and best management practices will be followed to minimize impacts from roads.

Slopes: The Forest Management Plans, draft Habitat Conservation Plan, and associated policies are designed to ensure forest resources are protected and that natural processes fundamental to healthy forest ecosystems continue. Best management practices are followed during forest operations, such as road building, to ensure that new roads are built in the best locations to meet forest management needs and minimize impacts to natural resources. All planned road construction is reviewed by a licensed geologist or engineer to ensure that the roads are located in stable locations and to provide the best protection for natural resources and public safety. Where older roads will be used, legacy features such as old fills or failing cut-slopes will be removed or repaired, and sections may be relocated away from sensitive areas.

DOCUMENT IMPROVEMENT COMMENTS

Comments include:

- *The Forest Grove District's desired future condition percentages are not aligned with the Forest Management Plan requirements.*
- *Include forest health priorities such as conversion of Swiss needle cast and root disease stands more explicitly in the final Implementation Plans.*

- *Provide more specifics on monitoring/detection for the Emerald Ash Borer in the Implementation Plans.*
- *Include information in the Implementation Plans on planned or potential use of seasonal road closures for wildlife management, protection from overuse of roads and security reasons.*
- *Recommendation to Include information from ODFW's State Wildlife Action Plan (formerly the Oregon Conservation Strategy currently cited in the Implementation Plans) which is currently being updated and includes updated species of greatest conservation and information need.*
- *Recommendations to consider fire mitigation on parcels near Shady Cove and begin a partnership with the Upper Rogue Forest Collaborative to work on plans for the Shady Cove area together.*
- *Encourage ODF to finalize and approve Implementation Plans quickly in order to not delay the Fiscal Year 26 cycle and get behind like the Fiscal Year 25 situation.*

DOCUMENT IMPROVEMENT RESPONSE:

ODF strives to provide useful and detailed information during for the public to review and provide feedback. All of the comments that target process and document improvements have been evaluated and considered for improvements during this Implementation Plan revision process. Several of the recommendations have been incorporated in these revised Implementation Plans. These changes are outlined in the Change Section at the end of this document and the Public Comment Summary of the individual Implementation Plans. The remaining recommendations will be considered during the implementation planning process that will be completed for the new Forest Management Plan.

OUT OF SCOPE COMMENTS

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

- *Forget the wildfire map.*
- *The acreage inside the proposed Habitat Conservation Plan should have Implementation Plans that are flexible to address environmental harm from natural causes such as wildfire, disease, insect infestation and floods.*
- *The Board of Forestry voted 4-3 to place 57+% of its lands off limits to harvesting timber for 70 years jeopardizing the ODF's budgets and increasing the certainty of future conflagration.*
- *The Board of Forestry has done a huge disservice to the citizens of Oregon by passing the Habitat Conservation Plan and discontinuing management on over one half of its lands under management.*
- *Since the Board of Forestry made its decision last year to keep the draft Habitat Conservation Plan as-is, we hoped the process would have moved more quickly.*
- *The Shady Cove parcels are not well marked with the proper boundary best management practices.*
- *The Shady Cove parcels are candidates for conversion to working community forests through real estate procedures.*

- *Recommends implementing the Oregon plan that the Government and Industry envisioned 100 years ago.*
- *Concerned that department is mismanaged.*
- *Recommendation to find other uses for the forest to replace jobs lost to mechanized logging equipment.*
- *Supports working together on the updated Forest Management Plan and associated Implementation Plans to include perspectives on conservation and dispersed recreational use.*
- *Oregon should find a different school funding model like Washington and the Elliott.*
- *Concerned that ODF focus is on Wildfire Map, mandates, controls, and restrictions instead of mitigating risk to adjacent landowners.*
- *Concerned that wildlife and environmental conservation measures applied in the last 10 years have made the forests more susceptible to catastrophic fires.*
- *Request that ODF review any wildlife or environmental protection changes made in the last 10 years to determine if they make forest fires more difficult to manage.*

CHANGES TO IMPLEMENTATION PLANS

The following is a summary of the changes that have been made to the Implementation Plans based on the feedback that was received and new information that we have learned:

Changes in the Implementation Plans included:

- “Forest Health”
 - Added information on surveys, monitoring and current conditions.
 - Added information regarding the emerald ash borer to Forest Grove and North Cascade districts.
- “Desired Future Condition”
 - The Forest Grove District’s desired future condition landscape design has been updated to be in alignment with the Forest Management Plan. There is now desired future condition of Layered stands at 15% and Older Forest Structure stands at 15%.
- “Planned Annual Harvest Objectives”
 - Updated wording to clarify language pertaining to Annual Harvest Objectives.
- “Forest Road Management”
 - Added information about road access management and travel management areas to all districts.
- “Appendix C - Changes to Terrestrial Anchors”
 - Added information into Astoria, Forest Grove, Tillamook and West Oregon district Implementation Plans for adjustments made for each Terrestrial Anchor where applicable.