

FISCAL YEAR 2027 ANNUAL OPERATIONS PLAN

Public Comment Summary

Public Involvement and Summary of Changes:

Fiscal year 2027 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 3, 2026, for the upcoming fiscal year's Annual Operations Plans. The public was notified via a statewide news release and subsequent media coverage, as well as through emails to citizens and stakeholders on ODF's mailing lists and notification on the ODF website. Public comment was accepted through the ODF website, email, or written correspondence.

In all, ODF received 1,515 letters related to the fiscal year 2027 Annual Operations Plans for the Astoria, Forest Grove, Klamath-Lake, North Cascade, Tillamook, West Oregon, and Western Lane districts. Each comment received was reviewed and the feedback considered through the lens of aligning with state forests current plans and policies. Comments received that resulted in edits to specific timber sales are detailed in Appendix D of the district Summary Documents and detailed at the end of this document.

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

RECREATION COMMENTS

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

- Supports expanding mountain bike trail network in Tillamook State Forest. (multiple commenters)
- Supports the construction of Electric Snake Trail in FY27 (multiple commenters)
- Recommends construction of mountain bike climbing trails in the Larch Mountain area. (multiple commenters)
- Recommends construction of a diverse range of downhill mountain bike trails to accommodate different skill levels in the Larch Mountain area. (multiple commenters)
- Recommends construction of single-track OHV trails in the Nicolai OHV Area (multiple commenters)
- Opposition of expansion of ATV trails in the Nicolai OHV Area due to negative impact on wildlife (multiple commenters)
- Recommends development of a target shooting area closer to Tillamook (multiple commenters)

- Recognizes volunteer engagement and commitment to the Larch Mountain MTB trail development (multiple commenters)
- Recognizes volunteer engagement and commitment to the Nicolai OHV Area
- Recommends avoiding or restricting logging activities that negatively impact recreation areas (multiple commenters)

RECREATION COMMENT RESPONSE:

Mountain Bike Trail Planning:

Between fiscal year 2020 and fiscal year 2025, ODF, in close partnership with community and volunteer organizations, permitted and supported the construction of three downhill mountain bike trails in the Larch Mountain area of the Tillamook State Forest. Building on that foundation, the program has now permitted an additional trail (approved FY27), Electric Snake, following biological review and approval.

Over the next several years, the Recreation, Education, and Interpretation program will continue advancing a comprehensive planning effort to align recreation management with the draft Habitat Conservation Plan and Forest Management Plan. This planning work will be encapsulated within the larger 10-year Implementation Plan that will help guide long-term management of all recreation infrastructure on state forests. Within this broader work, a primary focus area is the mountain bike trail network centered on the Drift Creek and Fear and Loaming Trailheads in the Larch Mountain area. Improving existing trails, enhancing user experience, and ensuring safe, sustainable access amid changing recreation trends will guide much of the program's planning and implementation work.

To meet these objectives, ODF will continue working with long-standing partners who have been essential to planning, building, and maintaining the existing trails. Future trail-related planning in the Larch Mountain area will emphasize accommodating a range of rider skill levels, exploring options for all-abilities access where feasible, and ensuring trail designs integrate effectively with current and future infrastructure. Maintenance agreements will continue to be central to supporting ODF staffing capacity and long-term sustainability of the trail system.

Additionally, transportation planning led by the Forest Grove District will play a substantial role in shaping access to both trailheads. This includes evaluating opportunities for improved ingress and egress, exploring potential road-to-trail conversions, and future climbing routes may be incorporated to support the full trail network. This work will help guide the next decade of improvements and ensure the Larch Mountain trail system remains sustainable, well-managed, and responsive to evolving recreational demand.

Interactions Between Recreation and Harvest Activity:

As state forests are actively managed working forests, interactions between forest operations and recreation infrastructure are expected. Across all districts, ODF uses practical strategies to minimize impacts on trail settings and visitor experience while maintaining safe and efficient forest

management activities. When planning timber sales, road construction, or stream enhancement projects, efforts are made to reduce the extent and duration of trail or facility closures. Where feasible, trail protection measures are incorporated into timber sale contracts, outlining requirements for closure signage, protection of trail structures, and restoration of any impacted trail segments following operations.

Throughout the sale layout, contract development, and administration process, foresters work in close coordination with recreation staff and other specialists to ensure that trail safety, resource protection, and user experience are consistently considered. Temporary closures may be required to ensure public safety in areas near active operations. When closures occur, ODF provides timely notifications through the agency website, trailhead kiosks, and on-site signage so the public remains well informed.

Nicolai Mountain OHV Trails

Within the Nicolai Mountain OHV Area, ODF continues to balance recreational access with resource protection and the long-term commitments outlined in the draft Habitat Conservation Plan. For the coming planning period, the Recreation, Education, and Interpretation program's primary focus remains on maintaining and improving the existing OHV trail system. This includes addressing deferred maintenance, reinforcing trail structures, improving drainage and tread durability, and ensuring that all routes meet safety and sustainability standards consistent with draft Habitat Conservation Plan direction.

A significant component of this work is protecting riparian and other sensitive aquatic and upland habitat components. As maintenance and improvement projects are prioritized, ODF will continue to evaluate trails in relation to streams, wet areas, and riparian conservation areas to ensure ongoing compliance with draft Habitat Conservation Plan conservation strategies. Where needed, trail alignments, drainage features, or protective measures may be adjusted to reduce fine sediment delivery to streams, reduce hydrologic connectivity, or enhance habitat resilience.

Partnerships with local OHV clubs remain central to the stewardship of the Nicolai Mountain system. ODF is actively working to strengthen and formalize maintenance and operations agreements with these groups to support long-term trail care and operational efficiency. Once the current trail network is in good condition and durable agreements are in place, the program will begin evaluating opportunities for additional trail development. Any future expansion will be guided by ecological considerations, draft Habitat Conservation Plan requirements, operational capacity, and identified recreation needs, with particular attention to riparian resources and species-protected areas.

TIMBER HARVEST COMMENTS

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

- Acknowledges ODF's obligations to pay for operations through timber harvest and meet GPV for all Oregonians.

- Calls for balanced, science-based forest management that upholds GPV by integrating fire protection, habitat conservation, sustainable harvest, clean water, and public use. (multiple commenters)
- Several commenters argue that current plans overemphasize revenue and clearcutting at the expense of ecological obligations, wildlife, clean rivers, recreation, scenic vistas, ecological resilience, public health, and long-term environmental protection. (multiple commenters)
- Argues plans are imbalanced by emphasizing preservation over economics; requests restoring GPV balance (multiple commenters)
- Urges ODF to prioritize ecological resilience, public benefit, and stewardship for current and future generations, emphasizing the importance of clean air and water, intact watersheds, wildlife habitat, climate regulation and cultural values, including protections for Tribal communities. (multiple commenters)
- Expresses concern that the FY27 AOP and current practices regress from past protections, elevate timber production over public interests, and risk long-term ecosystem health. Requests revising plans to increase environmental protections, reduce destructive practices, and ensure state forests are managed for the broad interests of Oregonians. (multiple commenters)
- Supports sustainable forestry and continued implementation of the HCP, 2010 FMP, and structure-based management as a foundation for long-term, ecologically sound forest management; highlights that deforestation historically precedes societal decline and underscores the responsibility to preserve forest ecosystems. (multiple commenters)
- Opposes commercial logging in critical, sensitive, and legacy forest habitats including stands over 100 years old arguing such harvests are unnecessary and conflict with state law and the Forest Management Plan. (multiple commenters)
- Opposes logging and proposals due to loss of natural spaces, impacts on wildlife habitat and public use areas, impacts to long-term health of forests, deforestation impacts, and recommends protection of natural resources and preserving forests (multiple commenters)
- States concern about declining revenue leading to taxpayer-funded shortfalls; requests maintaining economic leg of GPV.
- Highlights economic impacts on rural communities and essential public services from reduced timber revenue. (multiple commenters)
- Supports adopting the AOPs as written, maintaining current acreage levels for forest operations, and avoiding reductions in planned harvest areas. (multiple commenters)
- Opposes expanding restricted designations that would limit active management or reduce the acres available for operations. (multiple commenters)
- Opposes clearcutting across state forests including large-scale and expanded clearcuts, clearcuts exceeding size limits, and the 7,000 acres of proposed clearcuts citing impacts to public health, forest health, mature forests, water quality, watershed function, soil stability, carbon storage, riparian-dependent species, and overall ecosystem resilience. Commenters stress that clearcutting harms sensitive ecosystems, increases erosion and sedimentation, reduces water retention, raises soil temperatures, disrupts forest complexity, and causes irreversible damage to wildlife and habitat. (multiple commenters)
- Urges adoption of sustainable forestry practices and protections of critical forest habitat. (multiple commenters)

- Raises strong concern that clearcutting in older stands, mature forests, and habitat for listed species (such as salmon, marbled murrelets, and spotted owls) undermines conservation goals and contributes to long-term population declines. Opposes associated road construction due to ecological impacts and degradation of critical habitat. (multiple commenters)
- Opposes clearcutting that the Coos, Western Lane, West Oregon, Tillamook, and Astoria clearcut units contain habitat for threatened species such as salmon, marbled murrelets, and spotted owls. Opposes clearcutting due to harmful impacts on wildlife, especially listed species such as the Spotted Owl and Marbled Murrelet.
- Supports alternative practices to clearcutting such as thinning to improve forest structure, reduce stand density, and enhance wildlife movement. Some commenters suggest prioritizing harvest only in areas without recent Northern Spotted Owl detections and caution that limiting harvest too broadly may affect species dependent on early-seral conditions. (multiple commenters)
- Opposes removal of fire-resistant hardwoods (such as alder and maple) and favors retaining hardwood components to support forest resilience and ecological function. (multiple commenters)
- States concern that limiting harvest harms species like songbirds and pollinators that are dependent on early-seral conditions. (multiple commenters)
- Supports alternatives to clearcutting such as selective harvesting, variable retention, patch harvesting, thinning, and variable-density retention in overstocked or diseased stands to improve forest health, reduce fragmentation, maintain existing habitat, comply with the carbon plans, restore legacy forest structure, and favor fire-resilient species like oak. (multiple commenters)
- Supports increased active management and selective logging to improve forest health and benefit the economy.
- Supports harvesting smaller trees that are easier to mill.
- Requests maintenance/improvement of the forest for wildlife habitat, harvest, fire protection and multi-purpose public use (e.g. hunters, anglers, hikers).
- Supports increasing or maintaining timber harvest levels to sustain timber-industry viability, generate revenue for the Common School Fund, support rural communities, and ensure funding for counties, schools, and public safety. (multiple commenters)
- Expresses concern that reduced harvests shift financial burdens to taxpayers and cause financial distress for counties. (multiple commenters)
- Encourages increased active, sustainable forest management, including thinning, post-fire salvage within two years, and practices that prevent overgrown forests and improve vigor and resilience, arguing that reduced management undermines forest health and contributes to wildfire risks. (multiple commenters)
- Supports the FY27 AOPs and ODF's recent active-management approach, while expressing concern about harvest reductions under the HCP and restrictions in HCAs. (multiple commenters)
- Conveys concern that harvest modeling has changed and is not sustainable and questions whether it incorporates watershed health, wildfire resilience, carbon storage, and ecosystem impacts.

- Supports protecting old-growth and mature forests, emphasizing their irreplaceable ecological, cultural, and climate benefits including wildlife habitat, carbon storage, recreation, tourism, watershed function, and fire resilience. Commenters stress that logging old growth increases wildfire vulnerability and deprives future generations of these unique ecosystems. (multiple commenters)
- Raises concern about historically low remaining levels of complex and old-growth forests, noting past liquidation and outdated assumptions that mature forests were undesirable. Expresses worry that ODF practices have eliminated old growth and reduced complex forest structures below targets. (multiple commenters)
- Opposes harvesting or clearcutting older and legacy forest stands (ranging from 70–115+ years old), including calls to remove these stands from logging proposals and halt harvests due to declining levels of complex structure and their value for water cycling, biodiversity, critical fish and wildlife habitat, carbon storage, and clean air. (multiple commenters)
- Opposes harvesting mature or legacy forests, including objections to cutting older trees and stands identified in the FY27 AOP. (multiple commenters)
- Recommends protecting mature and complex forests, including prohibiting cutting old trees and conserving these stands for values such as biodiversity, watershed protection, climate resilience, carbon storage, and habitat. (multiple commenters)
- Supports harvesting older stands and harvesting across all age classes in alignment with HCP and FMP commitments.
- Opposes harvesting complex-structured forests and recommends revising AOPs harvest operations to retain all complex forests until the minimum of 30% of the forests are in this condition, as required by the 2010 Forest Management Plan and Key Performance Measure 10. (multiple commenters)
- Recommends preserving mature forest stands adjacent to proposed HCAs.
- Voices concern that mismanagement and reduction of complex forest structure have contributed to ESA listings as threatened for salmon, owls, murrelets, coastal marten and several other species. (multiple commenters)
- States concern about ODF's interpretations of KPM 10 requirements around pace and location, due to undermining structure-based management and delaying progress toward developing older complex forests with the HCP. (multiple commenters)
- States that acreage in complex structure has declined as compared to levels in 2013 to 11.75%.
- Notes concern that mismanagement have reduced complex older forest structure to 12-13% and 1% old growth. (multiple commenters)
- States continued clearcutting of complex structure violates the 2010 FMP requirement to conserve 30-50% complex structure and public trust. Urges ODF to comply with these requirements. (multiple commenters)
- Urges ODF to protect legacy forest stands as it transitions from the 2010 FMP to a new plan. (multiple commenters)
- Criticizes ODF for lack of compliance with existing policies including requiring protection of older mature forests and urges ODF to align draft plans with laws and policies, 2010 Forest Management Plan and Key Performance Measure 10, regulating timber harvest and protecting

and conserving forests for wildlife, fish, recreation, and climate resiliency. (multiple commenters)

- Opposes clearcutting in Habitat Conservation Areas (HCAs), including clearcutting for habitat restoration or in Swiss needle cast (SNC)-affected stands. Recommends using alternatives such as partial cuts, commercial thinning, retaining older SNC-resistant trees, maintaining diverse age classes, and replanting non-Douglas-fir species. Requests prohibiting clearcuts outright and favoring methods that conserve or enhance habitat quality. (multiple commenters)
- Raises concerns about planned HCA harvest levels being far below allowable volumes and urges expanding harvest within HCAs for habitat improvement, SNC treatment, and alignment with modeled outputs to maintain purchaser confidence. Opposes expanding additional restrictions, noting that the HCP already sets aside substantial acreage. (multiple commenters)
- States concerns about harvesting within HCAs and RCAs and endangered species protections outside HCAs.
- Emphasizes that HCA management should conserve and improve existing habitat, limit activities to those necessary for habitat enhancement, and adopt practices such as maintaining at least 70% canopy cover in Marbled Murrelet habitat and reserving trees 80+ years old adjacent to HCAs. (multiple commenters)
- Requests clearer justification for any timber sales in HCAs, recommending that ODF demonstrate necessity and prudence for habitat improvement.
- Encourages revising Desired Future Conditions in HCAs to better align with intended layered and complex forest structure outcomes.

TIMBER HARVEST RESPONSE:

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

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

State forest management plans establish management strategies and standards used to achieve Greatest Permanent Value. These management strategies designate different management emphasis areas across state forests. Some areas are focused on developing and maintaining mature forests, protecting and enhancing aquatic and/or terrestrial habitats, carbon sequestration and storage. Other areas are managed primarily with an economic focus, while still emphasizing resilient forest conditions and providing key resources such as clean water, biological legacies (old growth, leave trees, snags, downed wood), carbon sequestration and storage, and early seral

wildlife habitat. Recreation opportunities are provided across all emphasis areas offering a range of experiences reflecting on each area's management focus.

The management strategies set by forest management plans are primarily associated with resource protection and in many instances have a variety of management options that can 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, natural resource protection, and compliance with required laws.

Implementation plans describe the management approaches, harvest levels, and activities designed to achieve the forest management plan goals and describe the general locations where strategies will be implemented on the ground. Implementation plans provide the linkages among the forest management plan, draft Western Oregon Habitat Conservation Plan, Climate Change and Carbon Plan, operational policies, to the on-the-ground activities that are described in the Annual Operations Plans. Trade-offs for many of the topics for which public comments have been received were assessed and considered at the landscape level and are incorporated into the implementation plans. Implementation of these plans and policies will require the use of a variety of management tools such as clearcuts, thinnings, and passive management depending on the objectives of each area. This results in a variety of forest stand conditions across the landscape that maintain healthy, multi-species, vigorously growing forests, which will contribute to resilient healthy forests into the future. All of the forest operations in the Fiscal Year 2027 Annual Operations Plans have been developed and reviewed by field staff, technical specialists, and leadership to meet all requirements in the plans and policies discussed above, comply with state and federal law, and are required to meet the balance of Greatest Permanent Value as directed by the BOF.

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

Harvest Levels: Sustainable harvest levels for state forests in western Oregon were determined through the 2023 district harvest modeling analysis by modeling the requirements in the Forest Management Plans, draft Habitat Conservation Plan, operational policies, and current conditions.

This modeling estimated both harvest types and stand growth for multiple decades beyond the implementation plan term and was based on an even-flow goal, meaning harvest levels had to remain constant year to year. These harvest levels were reviewed for implementation by the districts before approval. The approved harvest levels are described in the Implementation Plans along with the different harvest types that will be used to meet these targets.

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

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

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

Inside the draft Habitat Conservation Areas, the overarching management objective is to increase the quality and quantity of habitat for terrestrial covered species through both passive and active management. Therefore, the only management actions that will occur in draft Habitat

Conservation Areas are those that will contribute toward achieving that objective. While portions of the Habitat Conservation Areas will be passively managed, stand management activities will be implemented in other areas to improve habitat over the long term for covered species. Typically, this will include a variety of density management prescriptions in healthy conifer forests to ensure that late-seral structure develops more quickly. In some cases, such as stands that are dominated by hardwoods or severely infected with Swiss needle cast, it will be more efficient to conduct regeneration harvests with higher levels of leave trees (larger or older trees, healthy conifer, etc.) and snags and replant a species mix that will develop into covered species habitat in a shorter time frame.

The draft Habitat Conservation Plan allows for an average of 1,500 acres of partial harvest and 1,000 acres of habitat restoration using 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 to increase the quality and quantity of habitat over time. Prior to receiving Incidental Take Permits, these areas will be evaluated by agency biologists for threatened and endangered species survey requirements and habitat suitability to develop potential candidates for inclusion in an Annual Operations Plan. Appropriate management prescriptions will be developed and reviewed by ODF Biologists to ensure compliance with the commitments set forth in the draft Habitat Conservation Plan. ODF's intent at the beginning of implementing these strategies is to ensure that the proper types of stands are being chosen to work in and appropriate prescriptions are applied for each stand while also considering survey costs for implementation prior to obtaining Incidental Take Permits. As more of this work is completed and once the Habitat Conservation Plan is approved, the pace and scale of the activities within the Habitat Conservation Areas will increase to meet the management objectives for increasing long-term habitat for the covered species.

Complex/Mature Forest Management:

As described in the Implementation Plans and consistent with the techniques described in the Forest Management Plan Landscape Management Strategy 1, ODF does harvest complex and/or older mature stands that are not included in the mapped landscape design for desired future condition complex stands or within Habitat Conservation Areas. This decision was made 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. Harvest of mature stands outside of these prioritized areas ensures that other aspects of Greatest Permanent Value and Implementation Plan objectives are being met while allowing younger stands to grow older in a sustainable matter.

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 as required by the Forest Management Plan. Areas designated as desired future condition complex and/or areas that have been designated as Habitat Conservation Areas have been identified as the highest priority locations where older trees and complex stands will be grown over time. Stands inside Habitat Conservation Areas, regardless of the desired future designation, will be managed according to the Habitat Conservation Area requirements.

In Oregon, one way agency performance is measured is through legislative key performance measures. Key Performance Measure #10 has a target to reach 30% complex structure over time on the Astoria, Forest Grove, and Tillamook districts. This key performance measure is utilized to show the trends of ODF's policy implementation over time to help inform decision making. As noted in KPM #10, complex forest structure develops very slowly, and it is anticipated to take decades to achieve the range of 30 to 50% complex structure that is described in the forest management plan. The timeline to meet this target is outlined in each District's Implementation Plan and reflects the areas that are designated through the current plans and policies where these stand structures will be achieved over time. According to the 2025 Annual Performance Progress Report, complex stand levels have continued to show an upward trend across the landscape since 2018, rising from 10.3 percent to 11.75 percent based on Stand Level Inventory data for the combined Astoria, Tillamook, and Forest Grove districts. In 2018, following an external expert review, ODF adopted a new growth model which improved estimates of stand growth but changed the way complex structure was calculated resulting in a decrease of acres. Due to these changes in calculation methods, current complex structure levels cannot be compared directly with values reported prior to 2018.

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

CLIMATE CHANGE AND FIRE MITIGATION COMMENTS

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

- Encourages adoption of climate-smart forestry and wildfire mitigation, including longer harvest rotations, reduced clearcutting, selective harvest approaches, and development of carbon markets and harvested-wood-product strategies to support long-term carbon storage and public benefit goals. (multiple commenters)
- States logging increases climate impacts and harms sensitive wildlife.
- Highlights rising sea level climate impacts on Tribal communities due to climate crisis and criticizes timber sector emissions.
- Concerned that ODF has expressed that the HCP is the main way the Climate Plan will be implemented but proposes 1,098 acres of thinning and 277 acres of clearcuts in HCAs.
- States AOPs do not align with ODF's Climate Change and Carbon Plan or Governor's climate Executive Order which directs ODF to lead by example and demonstrate climate-smart forest management to achieve GPV. (multiple commenters)

- Recommends that ODF should follow and align the AOP with the Carbon Plan in accordance with EO 20-04 and integrate the following into timber sale planning:
 - Extend harvest rotation ages to increase carbon storage.
 - Identify areas particularly susceptible to the deleterious effects of climate change and work to conserve them.
 - Restore insect and disease impacted areas to productive forests through careful removal of susceptible species and use of site appropriate species.
 - In stands with SNC, use selective logging to retain all healthy trees and species not susceptible to SNC, complex layered stands, and Aquatic Anchors.
 - Identify and establish priorities for areas that have high carbon storage potential.
 - Identify and operationalize carbon storage in harvest operations including developing a mechanism to maintain carbon forest on harvested site.
- Asserts that clearcutting increases wildfire risk, intensity, and hazardous fire behavior. (multiple commenters)
- Argues that reduced or insufficient active forest management heightens wildfire severity and risk and therefore urges continuation of active management practices to reduce fire hazards. (multiple commenters)
- Supports fuel-reduction strategies and health-focused forest management such as thinning, clearing, and ongoing maintenance, especially in young stands, to improve forest health, lower wildfire risk and reduce fire spread potential. (multiple commenters)
- Opposes withdrawing forests for management to enroll for carbon credit programs.
- Coastal state forests also have a tremendous capacity for storing carbon to fight climate change. (multiple commenters)
- Opposes clearcutting due to impacts on carbon storage, scenic values, and fish/wildlife habitat.
- Supports preserving mature forests and old growth trees in order to comply with ODF's Climate change and Carbon Plan and the Governor's Executive Order. (multiple commenters)
- Emphasizes the importance of mature forests as high-value carbon sinks. Highlights that older, complex forests store substantially more carbon, support biodiversity, and provide essential climate and ecological benefits. (multiple commenters)
- Raises concerns that current ODF management practices, including logging and clearcutting, reduce carbon-storage potential in coastal and high-carbon-value forests and release carbon, despite the climate and ecological value of these forests.
- Opposes logging and clearcutting due to carbon release, disruption of forest soils, and long-term climate impacts.
- Raises concerns that climate change will diminish quality of life for future generations if mature forests are not protected.

CLIMATE CHANGE AND FIRE MITIGATION RESPONSE:

State forests are managed for Greatest Permanent Value which includes providing for a diverse, healthy, productive, and sustainable forest ecosystem over time that reduce forest health issues, mitigate fire risk, and are more resilient to climate change. Greatest Permanent Value requires integrated resource management in order to continue to produce benefits under conditions driven

by climate change. These forests are actively managed to achieve objectives within stands and across the landscape to create a variety of forest conditions designed to meet Greatest Permanent Value while also improving resiliency and the capacity for adapting to climate change and mitigating fire risk.

As outlined in Implementation Plans and described in the Annual Operations Plan summary documents, the goals and supporting actions of the Climate Change and Carbon Plan (including climate-smart techniques) and the Governor's Executive Orders (EO 20-04, and 25-26) will be implemented in multiple ways including: landscape-level habitat protections which include large conservation areas (Habitat Conservation Areas, Riparian Conservation Areas) that have been expanded from the current FMP requirements, no-harvest wildlife areas, high value-conservation areas, other sensitive areas, forested areas that are inoperable. These areas combined across the landscape contain the majority of older mature forests on state forests and provide a tremendous contribution to carbon storage and will continue to do so long into the future. In addition to these large landscape contributions, existing old growth trees that are generally scattered trees or in small, isolated patches will be protected. Legacy structures (green trees, snags, down wood) retained within harvest areas will store carbon while seedlings regenerating around these structures will accumulate carbon. Carbon is also stored in harvested wood products such as wood for houses or other various lumber or paper products. Climate-informed silvicultural systems and prescriptions will be utilized where appropriate and include: planting multiple tree species, utilizing varied planting spacings and densities; utilizing clearcut, thinning, longer rotations, and passive management prescriptions in areas that align with the Forest Management Plan and draft Habitat Conservation Plan goals and objectives, and addressing forest health issues such as insects and disease to provide for a diverse, healthy, sustainable and resilient forest ecosystem over time.

While many of the goals and practices outlined in the Climate Change and Carbon Plan are currently being implemented, some higher level topics like harvest age outside of Habitat Conservation Areas and carbon pricing/carbon credits are still being considered by the Board of Forestry. Board of Forestry direction will be incorporated into the draft Western Oregon Forest Management Plan, performance measures, and associated Implementation Plans. This process is currently underway but has created a short-term transition period until those plans are finalized and adopted. During this transition period the majority of the goals and supporting actions identified for state forests in the ODF Climate Change and Carbon Plan are met through implementing the current Forest Management Plans and incorporating the draft Habitat Conservation Plan. Modeling presented to the Board of Forestry in June 2025 estimated increasing forest carbon storage under a variety of scenarios, including harvest levels greater than those being implemented currently.

YOUNG STAND MANAGEMENT:

Reforestation, species diversity and forest resilience are topics of concern. Comments include:

- Opposes monoculture replanting and expresses concern about biodiversity loss.
- Concern that ODF is not replanting at levels that exceed harvest levels to ensure sustainable yield and resilience.

- Opposes conversion of forests into monocultures.

YOUNG STAND MANAGEMENT RESPONSE:

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

Inside Habitat Conservation Areas, planting will occur at lower densities and incorporate greater species diversity in order to meet habitat objectives. Natural regeneration will be utilized in some small areas. If needed, alternative management plans will be filed where replanting densities may be less than those required by the Forest Practices Act standards to create habitat. Additional tree protection and vegetation management treatments will be based on site-specific conditions and management objectives. These treatments are intended to promote complex early seral stand conditions that have greater potential to develop into high quality habitat for the covered terrestrial species than more intensive approaches used for timber production. Herbicide comments are addressed in the Aquatic, Water Quality, and Wildlife response.

AQUATIC, WATER QUALITY, AND WILDLIFE COMMENTS

ODF received a number of comments regarding forest management activities and impacts to aquatic habitats, mature forests, wildlife, and drinking-water sources with recommendations for more protections and a shift to selective harvesting. Comments included:

- Recommends prohibiting clearcutting, converting proposed clearcuts to selective harvest while retaining healthy and SNC-resistant trees and avoiding clearcutting and roadbuilding on steep slopes inside Aquatic Anchors to minimize adverse aquatic impacts and maintain functional habitat. (multiple commenters)
- Raises concerns that the 20 proposed clearcuts in Aquatic Anchors, totaling roughly 2,484 acres, many in North Coast districts, could harm ESA-listed fish streams, water-quality-limited basins.
- Recommends monitoring water quality changes in Aquatic Anchors to minimize adverse aquatic impacts and create and maintain functional habitat.
- States concern that conversion of old growth forests to Douglas-fir plantations negatively affects stream flows and increases the effects of climate change.
- Emphasizes the need to protect mature forest habitats from degradation to support the survival of vulnerable species such as the Northern Spotted Owl, Marbled Murrelet, Steelhead, and Chinook Salmon. (multiple commenters)
- Raises concerns that 2 green tree per acre retention standard is insufficient for wildlife habitat, slope stability, and watershed resilience and requests interagency review.

- Highlights coastal rainforest provide habitat for wild salmon and wildlife species dependent on older mature forests. (multiple commenters)
- Opposes logging in areas with known habitat or areas reserved to protect imperiled salmon, wildlife like Marbled Murrelets and the Northern Spotted Owl, and fight climate change. (multiple commenters)
- Opposes herbicide and pesticide use on state forests, including within HCAs, Riparian Conservation Areas, community and domestic water sources, and the Astoria District; multiple commenters express broad opposition to aerial spraying and pesticide prescriptions. (multiple commenters)
- Raises environmental concerns about chemical applications, including impacts on forest health, soil fungi, understory vegetation, seed banks, native plant communities, rare species, insects, pollinators, amphibians, reptiles, mammals, songbirds, aquatic species (including juvenile salmon), air and water quality, watersheds, and long-term biodiversity. (multiple commenters)
- Highlights public health and water-quality risks from pesticide use, including drift from helicopter spraying and nearby clearcuts, contamination of drinking water supplies, harm to family and community health, and additional vulnerabilities during drought conditions and in already-impaired watersheds. (multiple commenters)
- Urges ODF to eliminate or greatly restrict herbicide use in the FY27 AOP, prioritize natural resource protection, and adopt stronger forest protections; commenters warn that herbicide treatments increase invasive species problems and note the ecological benefits of eliminating chemical use (reduced sedimentation, improved shade, intact fungal communities, and better forage and habitat). (multiple commenters)
- Recommends phasing out herbicides by identifying candidate stands and expanding the practice through successive AOPs.
- Raises concerns about risks and uncertainties around combining chemicals for vegetation control.
- Notes that herbicide use is often unnecessary for productive conifer growth, may not be economically beneficial, and resulting growth delays reaching free-to-grow stages are acceptable.
- Strongly opposes logging, pesticide, and herbicide applications in or near drinking water sources, including upslope areas, riparian zones, and community/domestic water systems; multiple commenters request defined protected areas, bans on clearcuts, and protections comparable to the Bull Run watershed. (multiple commenters)
- Raises extensive concerns that chemical use near drinking water sources in coastal communities such as Tillamook and Astoria and more broadly, poses unacceptable human and ecological health risks, including impacts to household water systems, air quality, hydrology, and downstream communities relying on state-forest watersheds. (multiple commenters)
- States that the plan does not adequately protect coastal or upstream drinking water sources and requests stronger safeguards, including limiting road building in riparian areas, prohibiting sales in protected drinking-water zones, and applying extreme caution with any pesticide use on public lands. (multiple commenters)

- Highlights that state forests provide important ecosystem services including clean and safe drinking water for more than 500,000 residents.

AQUATIC AND WILDLIFE, RESPONSE:

Aquatic Protections: ODF implements riparian conservation and management strategies, stream enhancement and aquatic organism passage projects and best management practices for roads and potential unstable slopes. These actions support the development of functional riparian forests with large healthy trees that provide shade, contribute to instream habitat complexity, and protect essential riparian functions, ecological processes and water quality. Riparian conservation and management strategies include riparian stream buffers, process protection zones, and equipment restriction zones which safeguard fish bearing, non-fish-bearing, perennial, seasonal, and drinking water sources for private and domestic use that play important roles in supporting aquatic habitat quality both within these waterways and downstream. Key to ODF's aquatic protections is additional leave areas established for unstable slopes which stabilize soils and add more wood to the aquatic system.

Riparian Conservation Areas are designed to conserve and maintain riparian habitats for the protection and persistence of aquatic covered species. The draft Habitat Conservation Plan conservation strategies were developed collaboratively by representatives from ODF, Oregon Department of Fish and Wildlife, Oregon Department of Environmental Quality, Oregon Department of State Lands, Oregon State University, U.S. Fish and Wildlife Service and NOAA Fisheries. Riparian Conservation Areas are implemented across all western Oregon state forests. All planned operations in the Annual Operations Plan will be implemented in alignment with the aquatic protection requirements in the Forest Management Plans, draft Western Oregon Habitat Conservation Plan, and other applicable laws.

Domestic Water: All harvest areas are screened for registered private and domestic water points of diversions within or up to 3,000 feet downstream of the harvest area as per the Oregon Forest Practices Act, using the most current mapped water rights data from the Oregon Water Resources Division. Streams on state forest lands are reviewed in the field. ODF also conducts outreach to adjacent landowners prior to timber sale layout, which can identify previously unknown domestic water points of diversion. Streams with identified private or domestic water points of diversions are protected in accordance with the Oregon Forest Practices Act, Oregon Department of Environmental Quality Clean Water Act, State Forests Management Plans and the draft Western Oregon Habitat Conservation Plan. These protections include aquatic and riparian buffer standards, additional protection measures, and tree retention for areas of potential unstable slopes such as inner gorges, landslide initiation sites and their associated potential debris flow tracks, and high energy seasonal streams. These policies are designed to ensure forest resources are protected and that natural processes fundamental to healthy forest ecosystems persist.

Water Quality/Herbicides: Timber harvest sites by law must be replanted, and ODF strives to use the minimum amount of herbicides necessary to ensure successful reforestation. Because ODF plants a diverse mix of tree species, herbicide strategies are tailored to site-specific conditions. After harvest, competing vegetation quickly re-establishes, and herbicides can serve as an

effective temporary tool to reduce this competition and allow seedlings to become established, helping ensure healthy future forests for Oregonians and the native species that depend on them.

ODF uses herbicides but does not use insecticides or rodenticides on state forests. Decisions about whether to use herbicides, and which products to apply, are made on a stand-by-stand basis after harvest, once vegetation conditions are known. Any application follows product labels and all applicable rules and laws to protect water quality, wildlife, and neighboring landowners. Licensed contractors apply herbicides and are closely monitored by ODF contract administrators, who are also licensed applicators. Ground-based applications are used where practical; however, relying exclusively on ground-based methods would significantly increase costs and create safety risks for crews working on steep slopes.

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

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

To prioritize enhancement efforts where they will provide the greatest ecological benefit, the Staff Aquatic Biologist utilizes desktop and field reviews to develop stream enhancement projects, in collaboration with ODF district staff, Oregon Department of Fish and Wildlife, and local watershed groups. Other local prioritization documents such as species-specific strategic action plans, rapid bio-assessments, and watershed assessments are utilized where available to help inform and focus enhancement efforts. Each year specialists review multiple potential stream enhancement opportunities – those that have a nearby timber sale, as well as those proposed by local partners.

ODF is working to improve the timing of stream enhancement planning so future AOPs can include more detailed project information. However, when working with external partners, timing may be subject to grant applications and the release of funds or other limitations. Changes in process and reporting will occur with approval and adoption of the draft Habitat Conservation Plan and the Western Oregon State Forests Management Plan and will be reflected in future Implementation Plans.

Aquatic Anchors: Aquatic Anchor sites are designated watersheds where salmon and aquatic conservation are a priority under the Species of Concern policy associated with the current Northwest State Forests Management Plan. This policy calls for additional aquatic and riparian standards than those in the current Northwest State Forests Management Plan when regeneration

harvesting near streams within Aquatic Anchors. All streams on ODF-managed forestlands in western Oregon including those within Aquatic Anchors are now protected by the draft Habitat Conservation Plan's aquatic and riparian strategies which meet the additional standards called for in the Species of Concern policy. These strategies do not preclude or limit harvest (clearcuts, thinning, etc.) or road building activities within Aquatic Anchors. While working in these Aquatic Anchors, operations follow the current forest management plans, implementation plans, and policies, which include the draft Habitat Conservation Plan requirements during this transitional stage.

Wildlife: State forests provide habitats for a wide variety of native wildlife, fish, fungi, and plant species across the landscape. ODF implements wildlife management and conservation strategies utilizing Habitat Conservation Areas, Terrestrial Anchor sites, and desired future condition locations that were delineated using current stands characteristics, connectivity principles, species of concern information, current and historic locations and habitat for marbled murrelets, northern spotted owls, and other covered species to protect and enhance existing habitat. A combination of approaches is used including:

- Using silvicultural tools to create an array of forest stand structures and habitat types (mature older forests, early seral, etc.) across the landscape;
- Expanded requirements for retention and recruitment of key structural components such as snags, green trees, and down wood;
- Protection of old growth trees;
- Expanded riparian and aquatic management standards, including stream restoration projects, and road/slope stability strategies;
- Site-specific plans such as customized harvest prescriptions, seasonal restrictions, logging slash management, buffers, and resource site protections.

The conservation strategies in the draft Habitat Conservation Plan were developed through collaboration among 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 Eastern Region Long-Range Forest Management Plan uses strategies such as Critical Wildlife Habitat Areas, Forest Connectivity Areas, road closures, key structural components and site-specific plans to address wildlife habitat protection. ODF biologists work with field staff during sale planning and layout to implement strategies where needed to meet habitat objectives.

In addition to the protections described above, during planning, ODF biologists consult several wildlife databases and the Oregon Biodiversity Information Center to identify potential interactions between harvest operations and species of concern. In addition to these screens, the biologists review all harvest operations for potential marbled murrelet and northern spotted owl habitat and conduct pre-project surveys to demonstrate compliance with the federal and state Endangered Species Acts until Incidental Take Permits are issued by the U.S Fish and Wildlife Service and implemented by ODF. For harvests that are located within known marbled murrelet management areas or northern spotted owl circles, Biological Assessments are developed by the biologists and consultations are conducted with the U.S Fish and Wildlife Service to ensure that harvest

prescriptions are in alignment with policies. These Biological Assessments are included in the Annual Operation Plan documents where applicable. All planned operations in the Annual Operations Plan will be implemented in alignment with the wildlife protection requirements in the Northwest, Southwest and Eastern Region Long-Range Forest Management Plans, draft Western Oregon Habitat Conservation Plan, policies, and other applicable laws.

ROADS AND SLOPES COMMENTS

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

- Opposes roadbuilding in Habitat Conservation Areas in the name of habitat restoration. (multiple commenters)
- Requests prohibition on roadbuilding in RCAs. (multiple commenters)
- Recommends limiting roadbuilding in HCAs to temporary roads and prohibiting roads built solely to reach harvest areas outside the HCAs.
- Recommends minimizing roadbuilding in HCAs.
- Raises concern about erosion, loss of soil viability, and road damage from clearcuts.
- Requests prohibiting road building and logging on steep, landslide-prone slopes that have the potential to degrade water quality, spawning habitat and impact watersheds and recreation areas. (multiple commenters)
- Requests protection of steep, forested slopes from roads, clearcuts, and pesticide use.

ROADS AND SLOPES RESPONSE:

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

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

Slopes: The proposed operations have been reviewed under the existing Forest Management Plans, the draft Habitat Conservation Plan, the Oregon Forest Practices Act, and Coho Settlement

Agreement requirements. These requirements provide riparian buffer rules and include additional protection measures and tree retention for areas of potential unstable slopes such as inner gorges, landslide initiation sites and their associated potential debris flow tracks, and high energy seasonal streams. These policies are designed to ensure forest resources are protected and that natural processes and functions fundamental to healthy forest ecosystems continue. These documents also specifically address landslides and describe a geologic evaluation process and unstable slope leave tree requirements. Landslides are important natural geological processes, which introduce critical habitat components that support spawning and rearing habitat, such as large wood and gravel, into the stream network. Every operation is evaluated for locations of elevated landslide potential. Trees are retained on identified locations to provide for continued canopy cover and root stabilization of soils. Some small seasonal streams receive additional buffering below unstable slopes. If these sites fail in the future, retained trees will provide wood delivery to the stream network. Best management practices are followed during forest operations such as road building, harvesting, trail construction, and site preparation to minimize soil compaction, protect soil structure and prevent erosion (surficial and mass wasting) and loss of organic materials.

In regard to public safety, as part of each operation's geologic review, homes and public roads that exist below proposed operations with steep slopes are evaluated for possible impacts by landslides. Leave trees are left on such slopes that could fail and impact public safety. All potentially unstable slopes and other geotechnical issues identified during Annual Operations Plan review or noted by foresters in the field are addressed prior to timber sales being sold.

PROCESS AND DOCUMENT IMPROVEMENT COMMENTS

A number of comments were received requesting additional information or processes to improve public understanding of the AOP documents. Comments include:

- Request formal written responses to the questions raised in the comments.
- Seeks transparent responses to key questions regarding forest health, funding, wildfire alignment and statutory obligations.
- Recommends adding explicit accountability for compliance with governing laws, policies, plans, performance measures and risks and tradeoffs. (multiple commenters)
- Requests AOP to include identification and removal of homeless camps due to fire and public safety concerns.
- Concern about 1-3 year delays in completing timber sale contracts, increasing fire risk and delaying revenue.
- Recommends continuation of annual purchaser meetings to discuss district issues, market trends, and operational considerations.
- Requests ODF evaluate cumulative landscape-scale impacts.
- Requests information on the effectiveness and future management options for stands infected with Swiss needle cast.
- Requests information on how the determination of habitat quality for which species is calculated is included in reports.
- Suggests adding Habitat Conservation Areas to timber sale maps.
- Requests information included in reports on how age of trees is determined.

- Request to provide more information in the AOPs describing how specific HCAs for logging were chosen, data about the current condition, how harvest improves habitat and meets biological goals of the HCP, and includes information on the tree selection process, types and sizes of residual trees, distribution, and more detailed prescription description for partial cuts. (multiple commenters).
- Requests public tours of proposed harvests within Habitat Conservation Areas to improve transparency and understanding of prescriptions.
- Requests adding identification of unregistered/unknown domestic water intake points and shallow wells into AOPs to protect from harvest impacts. (multiple commenters)
- Evaluate the climate impacts of proposed logging, road building and transportation and requests established measurable climate and carbon outcomes. (multiple commenters)
- Requests stronger watershed restoration planning, including stream enhancement commitments, clear priorities, budgets, and timelines, specific project information, and the Coast Coho Partnership Strategic Action Plan (SAP) priorities. (multiple commenters)
- Recommends that ODF should evaluate cumulative effects of clearcutting in Aquatic Anchors, cease clearcutting until analysis is complete or revise timber sales from clear cuts to partial cuts to protect water quality, stream temperatures, and better respond to climate change and maintain and enhance habitat. (multiple commenters)

PROCESS AND DOCUMENT RESPONSE:

ODF provides useful and detailed information during the Annual Operations Plan process for the public to review and provide feedback. This information also demonstrates how the Annual Operations Plans are aligned with higher level plans and processes. While the Annual Operations Plans and individual Pre-Operations Reports provide a wealth of information, ODF recognizes there is always room for improvement to ensure planned activities are communicated clearly and consistently, strengthen transparency, and increase accessibility. Comments that target process and document improvements will be evaluated and considered for improvements during the fiscal year 2028 Annual Operations Plan process.

SPECIFIC SALE COMMENTS

In addition to the comments that are summarized above, we received specific comments on individual sales on the Astoria, Forest Grove, Tillamook, North Cascade, West Oregon, and Western Lane Districts. These specific concerns and recommendations covered a wide range of topics including: avoiding clearcut harvests in older complex mature stands, HCAs, and/or Aquatic Anchors, increasing specific harvests, modifying harvest types and leave tree strategies, changes to desired future condition, recreation information and impacts, harvest challenges, modifying or eliminating herbicide/pesticide application plans, planting and young stand management recommendations, cumulative impact analysis, additional resource protections (wildlife, water, soils, unstable slopes, etc.), operational timing, constraints, and productivity concerns, road project modifications, pre-roading, and road rocking considerations, marketing strategies, considerations for adjacent landowners, or providing additional information for consideration.

SPECIFIC SALE RESPONSE:

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

OUT OF SCOPE COMMENTS

Comments that were out of scope:

- Requests protection of remaining iconic old-growth stands (Valley of the Giants).
- Recommends ending tax-exempt status for certain environmental organizations.
- Suggests higher taxes on large sports income and charging for arena use.
- Recommends alternative revenue sources such as the reinstatement of the severance tax, and a carbon credit program.
- Urges review of statewide government budgets and economic risk; implies need for fiscal strategies.
- Requests limiting timber imports.
- Argues decision-making should prioritize input from residents of forested areas; opposes outside influence.
- Notes importance of increased O&C revenue sharing.
- Notes reduced federal harvest increases fuel loads and severity.
- Notes untapped O&C revenue potential.
- Urges ODF to use conservative management because of changes on Federal forests.
- Supports expanding mill capacity and logging to generate revenue and employment.
- Calls for expanding or ensuring sufficient mill capacity near harvest areas to process logs efficiently.
- Raises concern about mill closures/economic impacts.
- Opposes past protections tied to the northern spotted owl.
- Highlights the ecological value of owls as natural pest control, especially in urban environments.
- Supports draft FMP shift toward ecological management focusing on improved water quality, and species recovery.
- Calls for the deletion or amendment of Principle 3 in the draft FMP requiring timber revenue to fund forest management.
- Concerned that recent clearcuts were included in HCAs while adjacent mature stands were excluded from future protections.
- HCP is necessary but insufficient; add strategies to recover 17 imperiled species.
- Supports finalizing HCP and adopting a new FMP based on ecological forest management principles. (multiple commenters)
- Supports the direction and finalization of the draft Habitat Conservation Plan (multiple commenters)

- Urges ODF to base forest management, harvesting decisions, and riparian protections on the best available science, including current research on water quality and quantity, climate impacts, herbicide use and impacts, and legacy forest functions. (multiple commenters)
- Highlights statutory obligations requiring ODF to manage state forests for multiple values (GPV), not solely harvest or revenue, and to apply best available science. (multiple commenters)
- Encourages ODF to adopt Washington county-developed climate informed forestry strategies.
- Stresses imbalance between wildfire acres burned and acres managed is unsustainable.
- Concern over rising wildfire suppression costs.

DISTRICT SPECIFIC CHANGES

The following is a summary of changes that have been made to fiscal year 2027 Annual Operations Plan documents based on the feedback that was received and new information that we have learned:

Astoria District

Primary/Alternate Changes

- None

Pre-Operation Reports

- Cultural Resource Review complete on all timber sales and REI Projects.
- Hunt Quarry
 - Acreage reduced from 120 to 113 acres after further field review.

Summary Tables

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

Summary Document

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

Misc

- None

Forest Grove District

Primary/Alternate Changes

- None

Pre-Operation Reports

- Cultural Resource Review complete on all timber sales, REI Projects and WOC Projects.
- Triple Play Unit 1
 - Geotech buffers updated after stream surveys completed.
- Mystree Solved
 - 0.35 miles of rocked new construction roads have been added, road improvement increased from 1.64 to 1.68 miles, and 0.08 miles of road vacating added after further sale review. Project work costs have been adjusted to reflect these changes.
- Swede Ridge
 - Volume per acre estimate increased from 52 to 53 MBF after further review.
- Thinnables Unit 1 and Triple Play Unit 3
 - Stream buffers updated.

Summary Tables

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

Summary Document

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

Misc

- None

Klamath Lake District

No changes made

North Cascade District

Primary/Alternate Changes

- None

Pre-Operation Reports

- Cultural Resource Review complete on all timber sales and REI Projects.
- Enterprise
 - Corrected the legal description (Township, Range, Section) and County shown on the Pre-Operations Report Map
- Left Shoo
 - Corrected the County shown on the Pre-Operations Report Map

Summary Tables

- None

Summary Document

- None

Misc

- None

Tillamook District

Primary/Alternate Changes

- Cultural Resource Review complete on all timber sales, REI Projects and WOC Projects.
- Quarrytown has been moved to primary sale status.
- Beyer Point and South Paw have been moved to alternate sale status.

Pre-Operation Reports

- Beyer Point (Alternate)
 - Exhibit A no longer includes the future spur road that goes further out on the ridge, and which is not part of the Beyer Point timber sale.
- Edward's Creek (Alternate)
 - Acres updated for Unit 348.
 - Table 4 updated to show that only Unit 182 has acres within an HCA.
- Flat Break
 - Additional acres coded as "No Harvest – Other" to account for bluff areas in Unit 918. AOP documents updated to reflect changes.
- South Paw (Alternate)
 - Leave Tree Considerations section updated to note that trees within the 8 acres in current condition layered (LYR) will be retained.

Summary Tables

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

Summary Document

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

Misc

- "Three Forks" has shifted to a 4th quarter sale.

West Oregon District

Primary/Alternate Changes

- None

Pre-Operation Reports

- Cultural Resource Review complete on all timber sales, REI Projects and WOC Projects.
- Grassy Yaq
 - Updated \$/Unit in Pre-Operations Report Table 1.
 - <1 acre change of boundary to accurately match the draft Habitat Conservation Area boundary.
 - Updated Pre-Operations Report map to reflect changes and show no-harvest areas.
- Bear Essentials Thin (Alternate)
 - Updated Pre-Operations Report map to show no-harvest areas.
- Burnt Street (Alternate)
 - Updated Pre-Operations Report map to show no-harvest areas.
- Lucki Lake (Alternate)
 - <1 acre change to match the timber harvest boundary to the boundary of the target stand.
 - Updated Pre-Operations Report map to reflect changes and show no-harvest areas.
- Pac Two (Alternate)
 - Corrected the County listed in the Summary Table to Polk.
 - Road Improve/Rock/Maintain in the Pre-Operations Report increased by 0.1 miles to match other Annual Operations Plan documents.

Summary Tables

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

Summary Document

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

Misc

- None

Western Lane District

Primary/Alternate Changes

- None

Pre-Operation Reports

- Culture resource review has been completed for all sales.
- Jack Hey
 - Volume per acre, project work and value have been updated after further field review of the sale.
- Sit Back

- Volume per acre, project work and value have been updated after further field review of the sale.

Summary Tables

- The Summary Tables have been updated to reflect the changes made to the timber harvest operations.

Summary Document

- The Summary Document has been updated to reflect the changes made to the timber harvest operations.

Misc

- None