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September 8, 2021

Via Email: ODF.SFCComments@oregon.gov

Oregon Department of Forestry Public Affairs
2600 State Street
Salem, OR 97310

RE: Fiscal Year 2022 Annual Operations Plan

Dear District Forester Steve Wilson:

Thank you for the opportunity to provide comments on the Oregon Department of Forestry’s (ODF) draft Fiscal Year 2022 (FY22) Annual Operations Plan (AOP) for the North Cascade District. We recognize the challenges this district has faced since the 2020 Labor Day wildfires and appreciate the dedication of staff and resources to restore the Santiam State Forest as quickly as possible.

It is disappointing that the total volume for this AOP is only 6.5 MMBF and 399 acres of partial and modified clearcuts. That is well below the previous annual harvest objective of 19 MMBF. It is also under the estimated volume in the revised implementation plan (IP) as seen below:

Table 12. Annual Regeneration Harvest and Partial Cut Acreage Ranges

	Regeneration Harvest Acres	Partial Cut Harvest Acres	Volume (MMBF)
FY 2021	1,000 – 3,000 ¹	500 - 1,200	35-60
FY 2022	0 – 1,500 ²	0 – 1,500	8-25
FY 2023	0 – 750 ²	0 - 800	8-15

¹Most of the post-fire harvesting will be prepared and sold in FY21. For FY21, the harvest acres will be near the top of the range.

²The harvest operations for FY22 and FY23 will include post-fire harvests where available and include other unburned harvests (partial cut and/or modified clearcut).

The FY21 total post-fire sale volume was 46.6 MMBF. This is on the lower end of the IP estimate as shown above and less than the estimated 56.2 MMBF in the revised FY21 AOP. Advertised volume in salvage sales were higher than what was actually sold, the difference being as much as 25-30% lower than advertised. The crown retention and leave tree requirements left out volume in some sales, in both harvest units and along roadsides.

As we have repeatedly expressed, it is frustrating to see that ODF is choosing to implement elements of a management plan that has not been approved by the Board of Forestry (BOF), therefore managing the North Cascade District under two different plans, which legally and practically does not make sense. Elements of the draft habitat conservation plan (HCP) that ODF

is choosing to implement is not scheduled to be approved until 2023 at the earliest, and it may not be approved by the BOF at all. Why is ODF applying draft HCP rules for riparian and habitat conservation areas in the post-fire sales in this AOP? The current forest management plan rules are what ODF should adhere to on all sales in all districts until the time an HCP is approved by the Board of Forestry and an incidental take permit is issued.

Please see comments and questions below on the timber sales listed in the AOP.

Elk Foot – 2.5 MMBF

We appreciate ODF continuing to offer post-fire harvest sales, but this sale raises several concerns and questions:

- 2.5 MMBF seems like a high estimate. The tree diameters in most the units are very small. The delay in harvest will result in the smaller trees to becoming checked and deteriorating more quickly, losing their value as the time since the fire extends. The cost of felling unmerchantable trees due to small diameters should be considered as well.
- We suggest increasing the removal requirement for white wood to at least 8 inches. These species are deteriorating quicker than the fir in the same stands. The Gawley Panther sale, which went for a reduced stumpage rate, is a good example of this issue, and it required an 8 inch and above removal.
- The green tree and snag retention requirements are high for this sale (7 per acre, 1,085 total), which makes operations more challenging and costlier. This issue is also present in the West 7 Mile sale.
- Why is the large buffer in Unit 1 needed? The creek bed was dry when visiting the stand in August, 2021. The trees along the creek are small and most are dead. What stream protections are they providing that would require such a large buffer? Since there is a road that passes over it, will an in-water culvert be needed?
- There is a stand between units 5 and 6 that is also dead. Why wasn't this stand included in one of the units? The small volume, cable logging costs for units 4 and 5, road costs (no rock pit available), and diminished contractor availability will make this sale less attractive to purchasers. If the volume is increased, the sale will be more economical to the purchaser and generate more revenue for ODF and Marion County.
- We suggest combining small units that are next to each other. For example, units 2 and 3, could be one unit or combined into one large unit by adding units 4 and 5. This will make operations more efficient for contractors. This issue and the opportunity to improve operational efficiencies and sale revenue is also present in the West 7 Mile sale.

West 7 Mile – 1.1 MMBF

This sale has similar concerns as Elk Foot. More specifically:

- There is a lot of white wood in this sale. As mentioned, this species appears to have been more susceptible to the fire than the fir in the same units. This will likely affect bid prices.
- The high number of green trees and snag retention for a salvage sale (469 total, 7 per acre) will cause operations to be more challenging and costlier.
- We suggest combining units 1 and 2. Unit 3 could be extended to the north along Green Mountain 400 Road where trees are also dead from the fire. The entire sale could be one unit if that stand is included.
- The north patch of unit 1 and east patch of unit 3 are very small trees in diameter. This will likely adversely affect the price of bids.

Silver Dollar – 2.4 MMBF

We appreciate ODF including green sales in this AOP of units ready for harvest. This is a well laid out sale, however the sale boundary could be extended to the northeast to include the entire parcel and increase the harvest volume of the overall sale and AOP.

Good Aim Thin – 0.5 MMBF

Again, we appreciate the inclusion of green sales in this AOP. Commercial thinning is an important part of forest management and silviculture practices. However, this sale is 100% cable logging, which contributes to higher production costs for a low volume sale. The north corner of unit 1 is particularly small in diameter. Winterizing thinning sales would help avoid bark slippage and generate a better stumpage price while providing more flexibility in operational timing.

The requirement to vacate part of a road will also add to the costs of this sale, likely reducing the bid amount from purchasers. We would suggest including ground based or modified clear cut units in thinning sales like this to make the sale more economical. Additionally, it would be economical for larger sales to provide stockpiled rock for road use on first entry commercial thinning like this sale.

Last West – 3.8 MMBF

This is a tradition sale for the district. It would be beneficial to offer it as a primary sale to increase the overall volume of the AOP, especially if the primary sales don't generate the revenue desired by ODF.

Again, we recognize the management challenges created by previous and current wildfires, but active state forest management must continue to be a priority for the state. ODF has the ability to maximize the harvest volume in the FY22 AOP and reduce operational costs to provide the revenue needed to restore the forest and generate revenue for the local communities that were severally impacted by the 2020 Labor Day wildfires.

Thank you for your consideration.

Sincerely,

A handwritten signature in cursive script, appearing to read "Laura Wilkeson", followed by a long horizontal flourish.

Laura Wilkeson
State Forest Policy Director
Hampton Lumber



September 8, 2021

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

**Re: FY 2022 Draft Annual Operations Plan
North Cascade District/Santiam State Forest**

Dear Board Members and Acting State Forester:

Thank you for accepting these comments on the draft Fiscal Year 2022 Annual Operations Plan (AOP) for the North Cascade District, comprising the Santiam State Forest. As the Board and staff are aware, approximately one-third of the Santiam State Forest was impacted to greater or lesser degrees by wildfires in 2020 resulting in mosaic burn patterns across the forest. Of this, the Department deemed approximately 3,500 acres available for post-fire logging, and the Department proposed in its 2021 IP Revision and accompanying 2021 AOP to log all 3,500 acres, subject to revision.

Some portion of this logging has occurred under a series of salvage sales contracted pursuant to the 2021 AOP. The current draft 2022 AOP proposes to log much of the remainder. It is unclear from the draft what board-feet and revenue would be attributable to post-fire sales versus green-tree sales. However, the plan indicates that 6.5 million board-feet (mmbf) would be logged under this AOP for 2021-22, with an additional 1.5 mmbf to be proposed under a separate, forthcoming plan.

Our organizations have invested heavily in the Santiam fire recovery process since late 2020, and while we are encouraged to see that some operational changes have made their way into this draft AOP, overarching concerns remain. As such, many of the points we have submitted to the Board and the Department in prior comment letters and testimony throughout the post-fire planning process represent ongoing problems, and we incorporate by reference those previous communications here.

As an initial matter, we have repeatedly raised the following point regarding ODF's short-term planning on the Forest while also moving forward in a long-term planning process: a wide range of stakeholders has participated extensively in the development and vetting of the Western Oregon State Forests Habitat Conservation Plan (HCP) and the new Forest Management Plan (FMP). Broad conservation commitments, along with specific mapped conservation units, while not finalized, are the working assumptions for the approval of those plans. Yet this draft implies ODF is doing operational planning as if in a vacuum. We do appreciate that in places, ODF has agreed to implement in its salvage logging plans the more-protective riparian standards outlined

in the draft HCP. However, we don't see in this draft AOP any indication that ODF has analyzed the impact its plans would have on mapped Habitat Conservation Areas (HCA) and Riparian Conservation Areas (RCA) under the draft HCP.

In good faith, stakeholders are working toward management for the Santiam that relies for its conservation values, in large part, on the habitat value of these two land-use allocations. Yet, if the habitat values of these areas are degraded by ODF operations prior to implementation of the HCP/FMP, then these assumptions may need to be revised. In that case, ODF may not be able to rely on those HCAs/RCAs to contribute toward the conservation requirements of the plan.

Please include identification and analysis of impacts to proposed HCAs and RCAs in the final draft of this AOP. Please include analysis that considers the contribution of unlogged, early-seral habitat created by fire to habitat values, and also takes into consideration that habitat values to listed species such as the Northern spotted owl are impacted to a much greater extent by post-fire logging than by fire itself. (Hanson et al. 2021; Lee 2018, 2020.) As we explained in extensive early comments on the Santiam Revised IP, ODF's apparent assumption that post-fire landscapes, even severely burned ones, are unusable as habitat for a wide variety of species (and is therefore suited only for logging and replanting) is clearly contrary to the established body of research. (e.g., DellaSala and Hanson 2015.)

Additionally, ODF's contention (p. 15) that young plantations provide high-quality early-seral habitat is not credible. Beyond the fact that the habitat quality of plantations is inferior to that of unlogged post-fire landscapes for early-seral obligates and associates, plantations also increase fire risk and in many cases, are unnecessary to meet reforestation objectives. (Zald and Dunn 2018.) Recent research, which our organizations shared with ODF several months ago, shows that post-fire forests can regenerate farther from a standing seed source than previously assumed. (Hanson and Chi 2021.) As it is planning reforestation efforts with limited resources, ODF should plan for a wider range of natural regeneration acreage than it is likely considering currently. Again, within current conservation overlays or those proposed by the draft HCP, ODF should be applying management consistent with best-available science, which is clear that unlogged, early-seral or mixed post-fire landscapes are widely valuable for habitat, while logged and replanted stands are inferior.

It would be contrary to the spirit of the HCP planning process to log and replant in proposed HCAs or RCAs, and we ask that ODF be extremely clear in the final draft of this AOP whether it is proposing to do so—whether in post-fire or green-tree timber sales.

The draft AOP prompts a list of other questions or comments, summarized below. Please feel free to reach out to us for clarification.

- Please disclose what sideboards will guarantee that live green trees and old-growth trees will be left in harvest units “wherever possible,” as stated at pages 5 and 8 of the draft. Please describe who makes that determination and upon what criteria.
- At page 9, the draft states that the entire Rhody Lake Terrestrial Anchor Site, which comprises desired future condition Complex stands, lies within the fire footprint, with 83% moderate/high burn severity. Is it correct that no post-fire operations are planned within this TAS?

- Also at page 9, the draft states that riparian management strategies “beyond those required by the FMP will be applied” within aquatic anchors. Please specifically state what those strategies will comprise.
- Thank you for indicating the desired future condition designations for the proposed sale areas. However, for conservation purposes, it is important to know what the pre-fire stand condition was. For the West 7 Mile and the Elk Foot post-fire sales, what was the **pre-fire** condition of the stand? If they were designated as current-condition complex stands prior to the fire, much of that structure and value remains, even in the severely burned patches, and should be disclosed.
- Please release the Biological Assessment for the Evans Creek NSO circle that is within the Elk Foot hazard tree removal unit.
- For the Last West green-tree sale, we strongly encourage the agency not to build the proposed new road, and to modify the sale layout if needed to avoid doing so. This is a heavily road-impacted landscape. Road and culvert rehabilitation and efforts to restore fish access to blocked stream reaches are vital efforts that we are pleased to see included as part of the package of work for the Forest; please don’t negate some of that good work by punching new road into this already fragmented and impacted watershed.
- Relating to the earlier point about planned HCA overlays, we have concerns with management for a conifer-dominant goal in areas that may become HCAs very soon. Planners should not “release,” manually or chemically, conifers from hardwoods in proposed HCAs or RCAs. Conifer-dominant management is relevant to lands in timber production, but not necessarily to those set aside for habitat conditions, for which a variety of hardwoods are extremely valuable but increasingly rare. Please disclose where conifer release would be planned in future HCAs, if any. Even better, refrain from conifer release in proposed conservation areas.
- We are aware that burned stands with a DFC Complex designation were logged in 2021, representing a practical net loss of lands under that designation, because their development into complex condition has now been delayed by decades. Consider permanently classifying Elk Foot units 3 and 5, and other units with scattered green trees, as Complex.
- Please prioritize finalizing the research proposals described at page 25, and ensure those results are made available and accessible to the public. This is a wonderful opportunity for the department to focus on lessons that can be learned after fires that can be applied in future fire recovery scenarios, and we strongly encourage that the findings be widely shared.

We request the Department hold off on any further auction and sale of these timber sales until it withdraws any logging units in proposed HCAs or RCAs. We understand that the department needs to finance the necessary Santiam restoration. However, the Department must also honor its prior commitments through this process.

Sincerely,

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Associated Oregon Loggers, Inc.

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September 8, 2021

Steve Wilson
North Cascades District Forester
2600 State Street
Salem, OR 97310

In Response to Action Item: Draft North Cascade District FY 2022 Annual Operations Plan

Dear Mr. Wilson,

Introduction

Associated Oregon Loggers (AOL) is a local trade association which represents nearly 1,000, family-owned forest contractors. Our members have been involved in the management of the Santiam State Forest for decades. Our members are essential to conduct any activity in the woods, be that road work for access, timber falling for management and restoration, reforestation for sustainability, trucking for product transportation, and many other services. AOL's members provide a diverse array of services that are necessary for Oregon Department of Forestry (ODF) to conduct successful post-fire restoration in the proposed Draft North Cascade District FY 2022 Annual Operations Plan (AOP). The best way to ensure economic viability and operational feasibility of salvage and restoration operations is to work with AOL, your partner in the forest contracting sector.

Our Perspective

First, AOL wants to thank ODF for considering additional hazard tree reduction and salvage operations in the Santiam State Forest. We recognize the difficult task ahead and applaud the state employees working tirelessly to ensure Oregon's state lands remain forested through their post-fire restoration efforts. Without the work proposed in this AOP, it is likely the Santiam State Forest would take decades if not longer to regenerate, leaving animals without habitat, timber dependent communities without jobs and Oregon with a large carbon source rather than a carbon sink.

The inability to remove standing dead and decaying timber will not only contribute to high fuel loads and greater [carbon sources](#) in the future but may also complicate both agencies' ability to reforest these areas safely and effectively.

Furthermore, research by the Forest Service's Northern Research Station shows that young trees pull carbon out of the atmosphere at an exponential rate which [enhances carbon sequestration](#) and restores the forests' role as carbon sinks.

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AOL does however have the responsibility to advocate for our members and ensure the work that ODF is proposing is the best option forward. ODF claims that their forests are managed to support rural schools and communities, timber related economies, high quality habitat for fish and wildlife, recreational experiences, and clean air and water. In other words, ODF is supposed to manage its lands for the greatest permanent value.

AOL recognizes the capacity issues that ODF faces in treating the burned areas in the Santiam State Forest. We would like ODF to focus first on those areas that will return value for additional post-fire restoration. Focusing on areas with merchantable timber salvage will allow maximized returns and greater value back to all Oregonians. Because this is Phase 1 of the FY 2022 AOP, we will keep our comments and concerns more specifically focused on that which is proposed in this phase and not on the overall process by which ODF has segmented sales due to perceived controversy.

Predictable Forest Product Expectations Not Met

According to the North Cascade District Revised Implementation Plan, the Department committed to removing an estimated 8-25 MMBF (19 MMBF pre-fire) in FY 22. The AOP authorizes a mere 6.5 MMBF in timber removal and 399 acres of treatment through post-fire restoration and sustainable forest management practices. This lack of treatment goes against the requirement to achieve greatest permanent value and the intention of providing “sustainable and predictable forest products that generate jobs and revenues for the benefit of the state, counties, and local taxing districts” according to the current Forest Management Plan.

AOL’s members require sustainability and predictability because these small forest businesses are extremely sensitive to shortfalls. They rely on trust and follow through in order to plan for future operations.

These are also the heavy equipment bosses and operators that the Department relies on during fire season. Shortfalls like this will not result in the needed capacity for forest contractors in this state.

However, we do support good treatments and simply wish to relay our frustration in the lack of follow through to achieve the estimated levels of harvest in the Revised IP.

Treatments Not Fully Achieving Goals

AOL is perplexed at the crown retention and leave tree requirements that seems to be leaving unsafe yet, viable commercial material on the landscape in harvest units and along roadsides.

The AOP states that where at least 80 BA of green trees exists in salvage units, all green trees will remain where operationally feasible. Regrettably, there is no clear language in the AOL as to how soundness, probability of mortality, root scorch or any other metric will play into labeling trees as “green” or not. If any number of green leaves identifies a tree as green, then ODF will be leaving

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many trees to dye, emit carbon and add fuel to the forest floor. AOL suggests removing any tree that has the possibility of dying within the next 5-10 years. This will ensure fiscal responsibility by the Department because one treatment to take out more now costs less than two treatments to take out the same volume.

Roadside hazard mitigation in partial cuts that prescribes to simply remove hazard trees or snags that are 1.5 tree lengths on either side of the road may not achieve the safety goals in all places. For instance, on steep uphill slopes, there is a danger for trees further than 1.5 tree lengths away from the road to fall, slide and roll to the road or fall into other trees that can create a cascade effect until there is finally debris that hits the road. Safety is not something AOL takes lightly and it is paramount that ODF take safety just as seriously when identifying risks and hazard reduction needs.

AOL is hearing from our members that treatments in the burned landscape continue to be very hazardous. The quality of trees is drastically declining, conditions are dry and dangers abound.

Green tree and snag retention as structural components also pose a risk to our members. To ensure safety of forest contractors, AOL believes when green trees are not available for retention on post-fire units, they should not be substituted at 2.5 snags per acre unless the forest contractor deems them too dangerous to fall and/or cull. The language could instead speak to “where operationally possible” or “where safe to do so”.

Habitat Conservation Plan

To add insult to injury, the Department has completely ignored AOL’s concerns with its use of Habitat Conservation Plan (HCP) treatment guidance. To reiterate, procedurally, it is inappropriate and illegal to include any language related to ODF’s potential HCP in the guiding documents for any of ODF managed lands until such a plan has been finalized. Upon finalization and approval by the Board of Forestry (BOF), plans can then be amended to include the approved plan guidance and requirements. Including language from an unapproved and draft HCP is illegal according to the National Environmental Policy Act (NEPA) because a “hard look” has not been conducted by the National Oceanic and Atmospheric Administration through ODF as the applicant.

Therefore, AOL believes no inclusion or mention of the potential HCP should be included in this AOL prior to finalization of the NEPA process and approval of the HCP by the BOF.

Conclusion

Overall, AOL is happy to see ODF continue to restore the Santiam State Forest as well as provide some valuable green timber to market. Regrettably, AOL’s members need ODF to follow through on its charge to provide sustainable levels of timber harvest that are predictable. We believe the Department could achieve more than just 8.5 MMBF in an entire Fiscal Year from the North

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Cascades District and hope to engage the District in adequate planning and implementation collaboration moving forward.

Sincerely,

A handwritten signature in black ink, appearing to be 'A. Astor', written over a horizontal line.

Amanda Astor
Associated Oregon Loggers
Forest Policy Manager
aastor@oregonloggers.org

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FY2022 State Forest Annual Operations Plans - Public Comment Opportunity

Starting Friday, May 7 through Monday, June 21, Oregonians can weigh in on draft Annual Operations Plans (AOPs) for state forests in the Astoria, Forest Grove, Klamath-Lake, Tillamook, West Oregon, and Western Lane Districts, which includes the Tillamook, Clatsop, Sun Pass and Gilchrist state forests. These plans lay out on-the-ground activities expected to take place in the coming fiscal year.

State forests by law must provide economic, environmental and social benefits to Oregonians. To achieve the legal mandate, these lands are managed to create healthy productive forests, high-quality habitat for native fish and wildlife, clean water, benefits and revenues to rural communities and timber-related economies, as well as recreation and educational opportunities. Overall management policies and management goals are established in long-range Forest Management Plans and Implementation Plans. Annual Operations Plans describe activities to achieve the policies and goals laid out in the longer-range plans. ODF is seeking input on the draft AOP summary documents, which can be viewed at <https://www.oregon.gov/ODF/Working/Pages/StateForests.aspx>. Forest Management Plans and Implementation Plans can also be found at this address.

Note that public comment for the North Cascade District (Santiam State Forest) FY2022 Annual Operations Plan will take place as part of a separate process.

If you would like to view the operations on a map and access reports on individual operations, please visit the ODF Annual Operations WebApp by visiting <https://geo.maps.arcgis.com/apps/webappviewer/index.html?id=ae569c1ff445457eb8fe1b556699bce8>. Reports can then be accessed by clicking on an operation, then clicking "More Info."

Common topics covered in an AOP include:

- Timber harvest operations
- Forest road construction, maintenance, and improvements
- Reforestation/replanting and young stand management activities
- Habitat improvement for native species
- Invasive species management
- Recreation improvement and maintenance projects

What kinds of comments are most helpful during the Annual Operations Plan public process?

The most useful input speaks to specific activities and how they relate to FMP and IP goals and strategies:

- Ensuring the annual plan is consistent with the implementation plan and/or forest management plan
- Suggestions to improve efficiency or effectiveness
- Clarifying how planned operations are described
- Providing additional information or correcting an error
- Are solutions-oriented, with the understanding that state forests must meet a suite of social, environmental and economic goals and offering how the department can meet those goals

How are comments used?

ODF staffers review all comments. Comments related to a district's operations receive district attention; comments that extend beyond single-district issues are considered by regional area staff and statewide program staff.

Option 1

My comments pertain to the following Annual Operations Plan: *

West Oregon District ▼

Are you familiar with state law and administrative rules requiring ODF to manage Board of Forestry lands for economic, environmental and social values? (Oregon Revised Statutes 530.050, Oregon Administrative Rule 629.035.0020) *

Yes

No

Are you familiar with the Forest Management Plans and Implementation Plans that govern activities described in Annual Operations Plans? *

Yes

No

When it comes to managing state forests, what issues are MOST important to you? (Check all that apply.) *

Harvest levels are too high

Harvest levels are too low

Wildlife

Fish

Water quality

Revenue to rural communities

Recreation

Reforestation

Timber-related jobs

Other:

Are activities in the AOP described clearly? *

Yes

No

If not, please explain.

.....

Do you have any additional information specific to a planned operation or forest project in the fiscal year 2022 AOPs that the agency should be aware of? *

Yes

No

If you answered yes to the previous question, please explain.

.....

Are there changes you want to see in planned activities to address issues that are most important to you? If so, please describe below.

Harvest more than the planned 3,000 acres of burned forest. Don't leave it like you did in the Santiam Pass area. Don't waste the wood in the forest, use it to build needed housing, and thus locking up carbon dioxide emissions. And especially, don't let the radical left lock up our forest, they are not the only ones that have a voice in this matter.

.....

What's your name? *

Warren Bednarz

.....

Preferred email address *

Warrenbednarz@gmail.com

.....

Zip code of residence *

97302

.....

Would you like to be notified of state forest planning processes and updates? *

- Yes
- No

In what format are you MOST likely to learn about upcoming state forest activities and operations?

- ODF website
- Newspapers or newspaper websites
- TV or radio
- ODF's social media accounts (Facebook, Twitter, etc.)
- Other websites
- Word of mouth
- Email or written notification from ODF
- Other:

The Oregon Department of Forestry is seeking to increase and improve engagement with Oregonians on state forest issues. Would you be likely or highly likely to...

- Attend an ODF-sponsored forum in my community
- Participate in an online chat or webinar
- Attend a community group presentation (watershed councils, civic groups, etc.)
- Provide written input during public comment opportunities
- Fill out an online survey
- Attend a field tour in a state forest
- Other:

What barriers have you encountered in trying to learn about state forest issues? (Check all that apply.)

- Didn't know about public participation opportunities
- Not enough information provided
- Information is too technical to understand
- Information not provided in my language
- Information hard to find on ODF website
- Other:
Information is being drowned out by mis information and controlled information from the liberals that out shout the rest of Oregon.
.....

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- Reforestation/replanting and young stand management activities
- Habitat improvement for native species
- Invasive species management
- Recreation improvement and maintenance projects

What kinds of comments are most helpful during the Annual Operations Plan public process?

The most useful input speaks to specific activities and how they relate to FMP and IP goals and strategies:

- Ensuring the annual plan is consistent with the implementation plan and/or forest management plan
- Suggestions to improve efficiency or effectiveness
- Clarifying how planned operations are described
- Providing additional information or correcting an error
- Are solutions-oriented, with the understanding that state forests must meet a suite of social,

environmental and economic goals and offering how the department can meet those goals

How are comments used?

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My comments pertain to the following Annual Operations Plan: *

Statewide/regional

Are you familiar with state law and administrative rules requiring ODF to manage Board of Forestry lands for economic, environmental and social values? (Oregon Revised Statutes 530.050, Oregon Administrative Rule 629.035.0020) *

Yes

No

Are you familiar with the Forest Management Plans and Implementation Plans that govern activities described in Annual Operations Plans? *

Yes

No

When it comes to managing state forests, what issues are MOST important to you? (Check all that apply.) *

Harvest levels are too high

Harvest levels are too low

Wildlife

Fish

Water quality

Revenue to rural communities

Recreation

Reforestation

Timber-related jobs

Other:

Are activities in the AOP described clearly? *

Yes

No

If not, please explain.

.....

Do you have any additional information specific to a planned operation or forest project in the fiscal year 2022 AOPs that the agency should be aware of? *

Yes

No

If you answered yes to the previous question, please explain.

Please clean up the Santiam forest after the fire. Log the dead trees and plant a new beautiful forest for the next generation to enjoy.

Are there changes you want to see in planned activities to address issues that are most important to you? If so, please describe below.

Salvage log the trees after wildfires and plant new trees to clean the air and restore the forest floor. Thin the forest that aren't burnt yet to make them more fire resistant.

What's your name? *

Eric Bufka

Preferred email address *

Ebufka@aol.com

Zip code of residence *

97338

Would you like to be notified of state forest planning processes and updates? *

Yes

No

In what format are you MOST likely to learn about upcoming state forest activities and operations?

ODF website

Newspapers or newspaper websites

TV or radio

ODF's social media accounts (Facebook, Twitter, etc.)

Other websites

Word of mouth

Email or written notification from ODF

Other:

The Oregon Department of Forestry is seeking to increase and improve engagement with Oregonians on state forest issues. Would you be likely or highly likely to...

- Attend an ODF-sponsored forum in my community
- Participate in an online chat or webinar
- Attend a community group presentation (watershed councils, civic groups, etc.)
- Provide written input during public comment opportunities
- Fill out an online survey
- Attend a field tour in a state forest
- Other:

What barriers have you encountered in trying to learn about state forest issues? (Check all that apply.)

- Didn't know about public participation opportunities
- Not enough information provided
- Information is too technical to understand
- Information not provided in my language
- Information hard to find on ODF website
- Other:
I think odf needs to do a better job of educating the public on the positive things forest management does
.....

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FY2022 State Forest Annual Operations Plans - Public Comment Opportunity

Starting Friday, May 7 through Monday, June 21, Oregonians can weigh in on draft Annual Operations Plans (AOPs) for state forests in the Astoria, Forest Grove, Klamath-Lake, Tillamook, West Oregon, and Western Lane Districts, which includes the Tillamook, Clatsop, Sun Pass and Gilchrist state forests. These plans lay out on-the-ground activities expected to take place in the coming fiscal year.

State forests by law must provide economic, environmental and social benefits to Oregonians. To achieve the legal mandate, these lands are managed to create healthy productive forests, high-quality habitat for native fish and wildlife, clean water, benefits and revenues to rural communities and timber-related economies, as well as recreation and educational opportunities. Overall management policies and management goals are established in long-range Forest Management Plans and Implementation Plans. Annual Operations Plans describe activities to achieve the policies and goals laid out in the longer-range plans. ODF is seeking input on the draft AOP summary documents, which can be viewed at <https://www.oregon.gov/ODF/Working/Pages/StateForests.aspx>. Forest Management Plans and Implementation Plans can also be found at this address.

Note that public comment for the North Cascade District (Santiam State Forest) FY2022 Annual Operations Plan will take place as part of a separate process.

If you would like to view the operations on a map and access reports on individual operations, please visit the ODF Annual Operations WebApp by visiting <https://geo.maps.arcgis.com/apps/webappviewer/index.html?id=ae569c1ff445457eb8fe1b556699bce8>. Reports can then be accessed by clicking on an operation, then clicking "More Info."

Common topics covered in an AOP include:

- Timber harvest operations
- Forest road construction, maintenance, and improvements
- Reforestation/replanting and young stand management activities
- Habitat improvement for native species
- Invasive species management
- Recreation improvement and maintenance projects

What kinds of comments are most helpful during the Annual Operations Plan public process?

The most useful input speaks to specific activities and how they relate to FMP and IP goals and strategies:

- Ensuring the annual plan is consistent with the implementation plan and/or forest management plan
- Suggestions to improve efficiency or effectiveness
- Clarifying how planned operations are described
- Providing additional information or correcting an error
- Are solutions-oriented, with the understanding that state forests must meet a suite of social, environmental and economic goals and offering how the department can meet those goals

How are comments used?

ODF staffers review all comments. Comments related to a district's operations receive district attention; comments that extend beyond single-district issues are considered by regional area staff and statewide program staff.

Option 1

My comments pertain to the following Annual Operations Plan: *

Western Lane District ▼

Are you familiar with state law and administrative rules requiring ODF to manage Board of Forestry lands for economic, environmental and social values? (Oregon Revised Statutes 530.050, Oregon Administrative Rule 629.035.0020) *

Yes

No

Are you familiar with the Forest Management Plans and Implementation Plans that govern activities described in Annual Operations Plans? *

Yes

No

When it comes to managing state forests, what issues are MOST important to you? (Check all that apply.) *

Harvest levels are too high

Harvest levels are too low

Wildlife

Fish

Water quality

Revenue to rural communities

Recreation

Reforestation

Timber-related jobs

Other:

Are activities in the AOP described clearly? *

Yes

No

If not, please explain.

.....

Do you have any additional information specific to a planned operation or forest project in the fiscal year 2022 AOPs that the agency should be aware of? *

Yes

No

If you answered yes to the previous question, please explain.

.....

Are there changes you want to see in planned activities to address issues that are most important to you? If so, please describe below.

I would like to see all the burned trees harvested quickly. not wait the 2 year cycle. The barren and burnt landscape looks so hostile. It needs to be logged, replanted for all the wildlife to have a place to return to live.

.....

What's your name? *

Leslie Shaw

.....

Preferred email address *

BUCKFALLS13@YAHOO.COM

.....

Zip code of residence *

97007

.....

Would you like to be notified of state forest planning processes and updates? *

- Yes
- No

In what format are you MOST likely to learn about upcoming state forest activities and operations?

- ODF website
- Newspapers or newspaper websites
- TV or radio
- ODF's social media accounts (Facebook, Twitter, etc.)
- Other websites
- Word of mouth
- Email or written notification from ODF
- Other:

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- Attend an ODF-sponsored forum in my community
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- Other:

What barriers have you encountered in trying to learn about state forest issues? (Check all that apply.)

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Yes

No

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Yes

No

When it comes to managing state forests, what issues are MOST important to you? (Check all that apply.) *

- Harvest levels are too high
- Harvest levels are too low
- Wildlife
- Fish
- Water quality
- Revenue to rural communities
- Recreation
- Reforestation
- Timber-related jobs
- Other:

Are activities in the AOP described clearly? *

- Yes
- No

If not, please explain.

.....

Do you have any additional information specific to a planned operation or forest project in the fiscal year 2022 AOPs that the agency should be aware of? *

Yes

No

If you answered yes to the previous question, please explain.

All the harvesting of burned timber and replanting of young trees is a great project and I encourage continuation of this policy, If not harvested, disease sets in to the burned trees , they fall down causing more fuel for future fires.

Are there changes you want to see in planned activities to address issues that are most important to you? If so, please describe below.

What's your name? *

Larry Wautlet

Preferred email address *

wautlet@comcast.net

Zip code of residence *

97304

Would you like to be notified of state forest planning processes and updates? *

- Yes
- No

In what format are you MOST likely to learn about upcoming state forest activities and operations?

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