

Public Comment Summary

2021 Implementation Plan Continuations (Astoria, Forest Grove, Tillamook, West Oregon, and Southwest Oregon)

A 21-day comment period was held starting March 24 and concluding April 14, 2021 and a public hearing was held April 1, 2021.

The public was notified via statewide news releases as well as emails to citizens and stakeholders on ODF's mailing lists, the ODF website, and posts on ODF's Facebook and Twitter platforms. Public comment was accepted through the ODF website, email, letter, and testimony was taken at the public hearing.

In all, ODF received 4 written comments and 3 people provided testimony during the public hearing.

- Public Testimony
 - **Amanda Astor (Association of Oregon Loggers)** - Offered AOL's support for the method of IP continuation, recognizing it is a time of flux and the agency must operate under the current plan passed by the Board of Forestry.
 - **Seth Barnes (Oregon Forest Industries Council)** - Indicated OFIC supports robust harvest on state forest to support community needs as well as industry infrastructure for social benefits. Would like to see more aggressive harvest, including in areas of "zombie alder" and Swiss needle cast-infected areas with a path toward restoration. Supports continuation of the IPs while the HCP planning effort is underway.
 - **Laura Wilkeson (Hampton)** - Supported extension of implementation plans in light of resources committed to HCP/FMP and Santiam State Forest restoration processes. Supports restoration of unproductive areas to support continuous harvest volume in Forest Trust Land counties. Stated that annual growth rate in state forests far exceeds harvests, and that continuations represent a modest approach.
- Written Comments
 - **Bob VanDyk (Wild Salmon Center)** – Concerned current IP's include harvest levels that were calculated more than a decade ago. Recommend using best available science and re-run the harvest models using the updated inventory and updated information learned from the Technical Expert Review Group (TERG).
 - **Grace Brahler (Beyond Toxics)** – Concerned that current IP's don't mention climate change and that carbon storage, climate change, water quality/quantity protections, and biodiversity must be key factors in forest management. Recommendation to update the implementation plans to include a climate change section to address carbon storage, wildfire, water quality, and equity considerations and to update state forest management techniques to achieve the directives described in the Governor's EO 20-04 on climate and equity.
 - **Laura Wilkeson (Hampton)** Supported extension of implementation plans without changes in light of resources committed to HCP/FMP and Santiam State Forest restoration processes. Supports restoration of unproductive areas to support continuous harvest volume in Forest Trust Land counties. Stated that annual growth

rate in state forests far exceeds harvests, and that continuations represent a modest approach.

- **Sue Craig (no affiliation)** Concerned about forest management plan, spraying, and beaver management.

Public Hearing Summary

Topic: Continuation of State Forest Implementation Plans for Astoria, Tillamook, Forest Grove, West Oregon, and Southwest Oregon Districts.

Date/time: April 1, 2021 at 5:30 p.m.

Non-staff present: Amanda Astor, Association of Oregon Loggers; Doug Cooper, Hampton Lumber; Greg Jacob, State Forests Advisory Committee; Laura Wilkeson, Hampton; Mike Totey, Oregon Hunters Association; Roger Rocka; Scott Gray, Stimson; Seth Barnes, Oregon Forest Industries Council.

Meeting began at 5:31 p.m. with presentation on Implementation Plan continuations from State Forests Operations Deputy Ron Zilli and Policy Analyst Justin Butteris, who also served as hearings officer.

Hearing began at 5:42 p.m. and the following comments were received:

Amanda Astor, AOL: Offered AOL's support for the method of IP continuation, recognizing it is a time of flux and the agency must operate under the current plan passed by the Board of Forestry.

Seth Barnes, OFIC: Indicated OFIC supports robust harvest on state forest to support community needs as well as industry infrastructure for social benefits. Would like to see more aggressive harvest, including in areas of "zombie alder" and Swiss needle cast-infected areas with a path toward restoration. Supports continuation of the IPs while the HCP planning effort is underway.

Laura Wilkeson, Hampton: Supported extension of implementation plans in light of resources committed to HCP/FMP and Santiam State Forest restoration processes. Supports restoration of unproductive areas to support continuous harvest volume in Forest Trust Land counties. Stated that annual growth rate in state forests far exceeds harvests, and that continuations represent a modest approach.

With no one indicating they'd like to provide further comment or ask questions, the hearing closed at 5:52 p.m.

From: [COX Jason R * ODF](#)
To: [SFCOMMENTS ODF * ODF](#)
Subject: FW: Comment on Extension of Implementation Plans
Date: Wednesday, April 14, 2021 4:08:18 PM

From: Bob Van Dyk <bvandyk@wildsalmoncenter.org>
Sent: Wednesday, April 14, 2021 4:06 PM
To: COX Jason R * ODF <Jason.R.COX@oregon.gov>
Cc: BUTTERIS Justin * ODF <Justin.BUTTERIS@oregon.gov>
Subject: Comment on Extension of Implementation Plans

Dear Mr. Cox,

I am writing to provide public comment on behalf of Wild Salmon Center regarding the extension of various Implementation Plans (IPs) for state forests beyond their initial expiration date.

Our concern is primarily that the IPs will lock in harvest levels that were calculated more than a decade ago.

We request that ODF re-run the harvest models using the updated inventory and updated information learned from the TERG process. We do not believe that simply extending the current plans without revisiting harvest levels comports with the best available science. Some private companies re-calculate harvests every other year. More than a decade without revisiting harvest projections is inadequate.

Sincerely,

Bob Van Dyk

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Bob Van Dyk
Oregon Policy Director
Wild Salmon Center
721 NW 9th Ave, Suite 300
Portland, OR 97209
Mobile Phone: 503-504-8471

"I am not aware of a constitutional principle that allows either private or public enterprises to despoil any part of the domain that belongs to all of the people. Our guiding principle should be Mr. Justice Holmes' dictum that our waterways, great and small, are treasures, not garbage dumps or cesspools."

-- Justice Douglas, dissenting in [Reserve Mining](#)



TO: State Lands Division, Oregon Department of Forestry
FROM: Grace Brahler, Oregon Climate Action Plan & Policy Manager, Beyond Toxics
DATE: April 14, 2021
RE: State Forest Implementation Plan Continuation

To whom it may concern:

Thank you for the opportunity to offer these comments in regard to the proposed Implementation Plan continuations for the Astoria, Forest Grove, Southwest Oregon, Tillamook, and West Oregon Districts. My name is Grace Brahler and I serve as the Oregon Climate Action Plan and Policy Manager for Beyond Toxics, a statewide environmental justice organization advancing policies that ensure meaningful participation and cultivating grassroots leadership from Oregon's frontline and impacted communities. My role involves co-leading the Natural and Working Lands Policy Tables concerning forests, agriculture, and water for the Oregon Climate Action Plan coalition (OCAP), which engages at every step of the EO 20-04 implementation process, working to ensure the strongest possible outcomes for our climate, our communities and our economy.

Equitable and ecologically-appropriate stewardship of Oregon state forests is critical for Oregonians, especially for historically disadvantaged populations. State forests offer free (or less costly) spaces in which Black, Indigenous, and People of Color (BIPOC) communities and low-income communities can recreate with their families. Further, the impacts of unsustainable natural resource management decisions disproportionately burden disadvantaged communities. The impacts of forest management decisions unfold against a backdrop of enduring racial and socioeconomic inequities that have shaped how historically underserved and underrepresented communities can withstand those impacts. We cannot be blind to equity and justice issues when addressing environmental and climate concerns, unless we wish to repeat and reinforce the decisions that have created sacrifice zones in low-income and BIPOC communities and left rural communities behind. It is the responsibility of the Department to ensure that these communities may continue to reap the recreational, health, social, and cultural benefits of our state forests for generations to come and are not disproportionately burdened by unsustainable forest management practices as the climate crisis worsens.

The North Cascade District (Santiam State Forest) implementation plan is the only plan that includes a section on climate change, albeit incredibly brief and added in response to the comments received from the public and other agencies. The other six implementation plans fail to even mention climate change. This is an egregious and inexcusable oversight of the Department of Forestry. Carbon storage, climate change, water quality and quantity protections, and biodiversity must be key factors in forest management decisions. **Thus, I strongly urge the Department to update the implementation plans under consideration during this comment period (Astoria, Forest Grove, Southwest Oregon, Tillamook,**

and West Oregon) to include a climate change section to address carbon storage, wildfire, water quality, and equity considerations.

Climate Change

The climate considerations in the North Cascade District implementation plan can be strengthened and used as a model for the implementation plans currently under consideration. In the revised North Cascade plan, climate management strategies include planting native and climate-adapted tree species that are adequately spaced and resilient to pests. Other logistical considerations include prioritizing harvests in a way that utilizes existing roads, grouping operations together, aerial seeding in locations that are difficult to access. Finally, the revised plan mentions leaving larger snags, all live green trees, and greater quantities of down wood in post-fire regeneration harvest areas.

However, there is more to be done if ODF is going to fulfill its legal duty to responsibly manage Oregon's state forests in the midst of the climate crisis. There are numerous studies that express the urgent need to discontinue releasing greenhouse gas emissions from our forests and offer proven ways to increase carbon sequestration potential. Recommendations for climate-smart forestry management that should be incorporated into the implementation plans include:

- Lengthening logging rotations, as older trees have greater carbon storage potential. This would also increase timber yield and quality.¹
- Increasing green tree retention on the land during harvest and promoting diversity of species versus monoculture plantations. This will keep more carbon on site, lead to more resilient stands that can withstand extreme weather events, reduce the need for aerial and ground pesticide spraying, and provide necessary habitat for native species.
- Eliminating logging in biologically significant, carbon-rich mature and old growth forests and in forests with the highest carbon sequestration potential.
- Incorporating tribal climate mitigation and adaptation practices that can support increased carbon storage and sequestration in Oregon's forests. ODF should work to build bridges between Western (conventional) and Indigenous practices to improve its forest stewardship practices in the face of climate change.

Wildfire and Water

I also want to encourage the Department to consider the best available science on greenhouse gas emissions when implementing wildfire mitigation, adaptation, and restoration plans for our state forests.

¹ See Beverly E. Law, Tara W. Hudiburg, Logan T. Berner, Jeffrey J. Kent, Polly C. Buotte, Mark E. Harmon 2018. Land use strategies to mitigate climate change in carbon dense temperate forests. Proceedings of the National Academy of Sciences. <https://doi.org/10.1073/pnas.1720064115>;

Mark E. Harmon, 2019. Have product substitution carbon benefits been overestimated? A sensitivity analysis of key assumptions. Environmental Research Letters. <https://doi.org/10.1088/1748-9326/ab1e95>;

Stephen J. Fain, Brian Kittler, Amira Chowyuk, 2018. Managing Moist Forests of the Pacific Northwest United States for Climate Positive Outcomes. Multidisciplinary Digital Publishing Institute https://www.researchgate.net/publication/328229114_Managing_Moist_Forests_of_the_Pacific_Northwest_United_States_for_Climate_Positive_Outcomes

If state forests are managed in a climate-smart manner, they will be better able to withstand the impacts of wildfire. Studies show that thinning existing forests to reduce fire risk actually increases net carbon emissions to the atmosphere for many decades.² Carbon emissions from logging far exceed the carbon emissions from wildfire (50 percent emitted compared to 5-10 percent emitted respectively).³ Fire is a natural process and leaving partially burned trees on a landscape allows those trees to store carbon for decades, eventually decomposing naturally and transferring carbon into the soil. Natural recovery also allows for a complex forest structure with diverse vegetation and increased biodiversity. Little carbon is stored in wood products if partially burned trees are harvested for timber.⁴

In light of the limited resources available for state forest management, post-fire management efforts should focus predominantly on those areas that are immediately adjacent to communities and should be conducted in an ecologically-sound manner. Projects should be focused on readying the home ignition zone and immediate boundaries to communities for future wildfire events, both for the safety of our communities and our wildlands firefighters.

Post-fire logging also puts watershed health at risk. The large majority of Oregon's residents and communities draw their drinking water from rivers and streams that begin in a forest. Post-fire logging operations disturb soil and remove trees that are needed to anchor soil as vegetation regenerates. Increased sediment runoff clog waterways, degrade fish habitat, and negatively impact drinking water for local communities. Pesticide application puts these source waters at risk as well. Water infrastructure for water service providers is outdated and treatment needs are costly. Drinking water violations disproportionately occur in communities of color, especially in rural and tribal areas.⁵

State forest implementation plans must decrease clear cutting and increase riparian protections to reduce nutrient build-up in lakes and reservoirs, maintain cooler water temperatures, support aquatic organisms and fish, and help prevent algal bloom that create poisonous toxins, such as the situation that developed in Detroit Lake, a reservoir on the Santiam River that provides Salem with drinking water. The city's water supplies were shut down and subsequent health advisories related to drinking water plagued the city for weeks. Forest practices were identified as one of the factors contributing to algal blooms in Salem's drinking water.⁶ As reported in the 2020 Harmful Algal Blooms Work Group Final Report to the State Legislature:

“One way to mitigate and slow cyanobacteria in the short term is to mitigate the amount of nutrients discharged into a watershed. In the case of Lemolo Lake, switching from clear-cutting forests in the mid 1990's to timber thinning by 2005 provided the ecosystem with a greater capacity to absorb phosphorous, and decreased the rate of flow from the upland areas (Hall, 7).

² Law, B.E., Waring, R. 2015. Carbon implications of current and future effects of drought, fire and management on Pacific Northwest forests, *Forest Ecology and Management*. <https://doi.org/10.1016/j.foreco.2014.11.023>

³ Id.

⁴ Harmon, M.E. 2019. Have product substitution carbon benefits been overestimated? A sensitivity analysis of key assumptions. *Environ. Res. Lett.* 14 065008. <https://iopscience.iop.org/article/10.1088/1748-9326/ab1e95>

⁵ Samayoa, Monica. “Study: Safe Drinking Water Violations Are Higher For Communities Of Color.” September 25, 2019. <https://www.opb.org/news/article/safe-drinking-water-act-violations-communities-color-study/>

⁶ Ross, Erin. As Salem Frets About Toxic Algae, Should The Rest Of Oregon? <https://www.opb.org/news/article/toxic-algae-salem-oregon-water-contamination-facts/>

The lower rate of flow allows for greater deposit of sediments and phosphorous along with it. As for Tenmile Lake, increased logging and urbanization leading to the drainage of wetlands increased both the amount of nutrients and the flow of water within a watershed (Hall, 10).⁷

As the impacts of climate change worsen (including drought, heat waves, and more extreme precipitation events), Oregon's forests need to also be managed for clean water quality, water quantity, and flood prevention as an adaptation tool.

Conclusion

In sum, the implementation plans under consideration (Astoria, Forest Grove, Southwest Oregon, Tillamook, and West Oregon Districts) should be updated to include climate change considerations. Improving state forest management techniques can also help ODF achieve the directives laid out in the Governor's EO 20-04 on climate and equity. Thank you for considering these comments.

Sincerely,

Grace Brahler, Oregon Climate Action Plan & Policy Manager
gbrahler@beyondtoxics.org
Beyond Toxics
120 Shelton McMurphey Blvd., Suite 280
Eugene, OR 97401

⁷ Harmful Algal Blooms Workgroup Final Report. November 2020.
<https://olis.oregonlegislature.gov/liz/2021R1/Downloads/CommitteeMeetingDocument/230191>



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April 14, 2020

Via Email: odf.sfcomments@oregon.gov

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

RE: State Forest Implementation Plan Continuations

Dear State Forester Daugherty:

Thank you for the opportunity to provide comments on the proposed continuation of the Astoria, Forest Grove, Tillamook, West Oregon, and Western Lane implementation plans (IP) until June 30, 2023.

The Oregon Department of Forestry (ODF) state forest division is undertaking several substantial and contentious projects. Staff time and resources should be devoted to the bigger issues at hand, including the proposed habitat conservation plan, companion forest management plan, and most importantly, restoring the Santiam State Forest that was severely burned during the devastating Labor Day fires in 2020.

For years, Hampton has engaged with stakeholders and ODF staff in advocating for active management of state forests. This includes support for restoration of unproductive lands, achieving financial viability, and harvest volumes that support forest trust land counties and rural communities. Each state forest district's annual growth far exceeds harvest level goals and outputs. This means that ODF could be doing more to actively manage state forests and provide greater economic, environmental, and social benefits for all Oregonians.

It is worth noting that this isn't the first time IPs have been extended. Due to the constraints on ODF staff and resources, we are supportive of extending the IPs without changes at this time.

Sincerely,

Laura Wilkeson
State Forest Policy Director
Hampton Lumber

From: oregon-gov-web-services@egov.com
To: [SFCOMMENTS ODF * ODF](#)
Subject: State forests public comment
Date: Saturday, April 03, 2021 11:38:24 AM
Attachments: [forms submission.csv](#)

Name	Sue Craig
Email	sueacraig@gmail.com
Phone	
Subject	Implementation Plan Continuations
Comments	<p>Concerning you forest Management plan.... 1) We need your Dept. to function without cutting our trees down. New sources of funding. 2) There are very few forests...real forests, not plantations left in our world. We are in trouble, and you need to look at this big picture. 3) STOP using spraying. It is not good for our soil, our animals, our insets, our birds, or our water and therefore, not good for us. 4) The Timber industry...the one that is usually traded on Wall St. has had way too much influence on OSU's Dept. of Forestry. You can see it in the foresters that it turns out, and their process of management, and also in the suppression of studies done to provide information on subjects like carbon sequestration. 5) And where are the beavers? Beavers can do so much for fire suppression, and especially for ground water retention/aquifers. We need to learn to live with other beings in this world, not to kill everything, because it causes a bit of a problem. And...we need lots of beavers, not just a select few. 6) Forest management needs to be a big picture. Not plantations, but FORESTS, complete with all flora and fauna. Thank you...Sue Craig</p>

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