

Public Comment Summary

FY 2022 Annual Operations Plans for Astoria, Forest Grove, Klamath-Lake, Tillamook, West Oregon and Western Lane districts

In order to engage with Oregonians, Oregon Department of Forestry's (ODF) Annual Operations Plans (AOPs) for an upcoming fiscal year had a 45-day public comment period, which began May 7, 2021. The public was notified via a statewide news release and subsequent media coverage, as well as emails to citizens and stakeholders on ODF's mailing lists, the ODF website, and posts on ODF's Facebook and Twitter platforms. Public comment was accepted through the ODF website, email, or letter, as well as a survey that will help the department gather some aggregate data on public opinion regarding state forest matters and forestry generally, as well as ways to improve our public outreach strategies.

In all, ODF received 138 written comments related to the fiscal year AOPs for the Astoria, Forest Grove, Klamath-Lake, Tillamook, West Oregon and Western Lane districts. This summary does not include comments regarding ongoing or planned post-fire operations on the North Cascade District. The North Cascade District FY22 AOP will be part of a separate public comment process. Comments wholly unrelated to ODF or outside ODF's regulatory authority, such as tree removal by other agencies, was considered out of scope and not included in this roundup.

The following is a summary of comments and responses submitted by the public related to the draft FY 2022 Annual Operations Plans for Astoria, Forest Grove, Klamath-Lake, Tillamook, West Oregon and Western Lane districts.

Recreation Comments

Comments related to the state forests recreation, education and interpretation program include:

- Encourage alternative revenue streams through more robust tourism and recreation features.
- A number of commenters indicated support for the proposed electrical power installation project at Reehers Camp in the Forest Grove District.
- Multiple comments were received regarding the Round Bell and Unparalleled timber sales on the Forest Grove District voicing concerns about visual impacts to trails. This was, by a large margin, the most common message received during this comment period.
 - o Many were users of the recreational trails in the area and were concerned about the loss of aesthetic appeal resulting from impact to the recreation system
 - o Related, some said the recreation impacts could reduce visitation, harming tourism-dependent businesses
 - o Fish habitat impact from clearcutting in the Gales Creek area were cited by some

Reehers Camp Response: This project will move forward as proposed and the ODF Recreation Education and Interpretation (REI) team will work on implementation over the coming year(s).

Unparalleled and Round Bell Response: ODF received many comments concerning timber harvest activity overlapping recreational trails. This is a longstanding issue for both non-motorized and

motorized trails in a State Forest busy with public use. The agency works in an integrated manner across the REI, young stand management, roads and forest management teams to address this situation. The Department of Forestry recognizes that timber harvests can and often do change the trail setting on the landscape and the use experience for trail enthusiasts.

ODF has employed many different methods to minimize disruption to trail access as well as impacts to both trail setting and visitor experience. These strategies have included implementing trail buffers, strategic location of legacy structures (green trees and snags) along trail corridors, managing timber sale timing to reduce trail closure periods, restricting the number of trail crossings made by operators during harvest, and writing trail protection and restoration language into the timber sale contracts.

Managing Oregon's state forests for multiple uses is oftentimes a balancing act, appreciating that a portion of the associated timber harvest revenues support recreation trails, facilities, and infrastructure across state forests. In the case of the Unparalleled and Round Bell (alternate) timber sales, the Forest Grove District fully recognizes the importance of the trails adjacent to and within the sale areas. For each sale, site specific mitigation measures will be implemented as foresters work in conjunction with the afore mentioned management teams to achieve a mix of social, economic, and environmental benefits during sale layout.

Climate Change and Carbon Comments

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

- Taking steps to integrate climate change impacts and greenhouse gas emissions per Governor Kate Brown's Executive Order 20-04
- Requiring more environmental review through the climate change lens
- Importance of standing trees in carbon storage
- The role of wood products in storing carbon
- Focus on unmet need for carbon storage
- Effects of fires have reduced future snag availability for decades
- Expand carbon storage through longer rotations
- Prioritize stands with older forest characteristics for carbon storage
- Support for replanting diverse species for more resilient stands

Response: Climate change and carbon sequestration are generally topics related to higher level strategies in the Forest Management Plans (FMPs) or Implementation Plans (IPs). Current implementation of these plans result in a variety of forest stand conditions that maintain healthy, multi-species, vigorously growing forests, which will contribute to resilient healthy forests into the future. Legacy structures retained within harvest areas will continue to store carbon while the new seedlings regenerating around these structures will accumulate carbon at a fast rate. Areas of the forest that have a desired future condition of Layered or Older Forest Structure, riparian areas, no harvest wildlife areas, forested areas that are inoperable, etc. provide carbon storage throughout large portions of the landscape.

Forest health strategies are addressed on a site-specific basis when the reforestation plan is developed for planting and other young stand management treatments. Site specific prescriptions consider target

species, aspect, elevation, soil types, Swiss Needle Cast risk where applicable, *Phellinus weirii* (laminated root rot) presence, required stocking guidelines, natural advanced regeneration, and the desired future condition of the stand. This will provide for a diverse, healthy, productive, and sustainable forest ecosystem over time that will be more resilient to change.

Topics such as carbon sequestration and climate change are part of the ongoing work by the Board of Forestry and ODF staff to define authorities and develop policies to mitigate climate change concerns. ODF is starting to develop a Climate Change and Carbon Plan for the agency. [View the draft Climate Change and Carbon Plan](https://www.oregon.gov/odf/forestbenefits/Documents/odf-climate-change-and-carbon-plan-draft.pdf) (https://www.oregon.gov/odf/forestbenefits/Documents/odf-climate-change-and-carbon-plan-draft.pdf). ODF invites you to remain engaged with us during this process. Comments can be submitted to the agency by, [filling out this comment form](https://www.oregon.gov/odf/forestbenefits/pages/comment.aspx) (https://www.oregon.gov/odf/forestbenefits/pages/comment.aspx).

Work has begun on the Draft Western Oregon Forest Management Plan which will replace current forest management plans for state forests in western Oregon and incorporate strategies outlined in the draft Western Oregon State Habitat Conservation Plan if approved by the Board of Forestry. Participation in future Board of Forestry meetings and Public Engagement meetings for the Draft Western Oregon Forest Management Plan is encouraged to learn more about the plan and to provide input and feedback for topics such as forest health, timber production, water quality, climate change, carbon sequestration and other topics of concern. Information on the Draft Western Oregon Forest Management Plan process including public engagement can be found here: <https://www.oregon.gov/odf/aboutodf/Pages/fmp-companion.aspx>

Fish and Wildlife and Stream Enhancement Comments

- Encouraging establishment of beaver colonies and other keystone species to create stream complexity in wetlands
- Greatest permanent value can be better met by providing public services such as improved habitat for fish and other wildlife
- Stream enhancement planning should be integrated into the planning phase

Response: In 2018 and 2019 ODF partnered with the Upper Nehalem Watershed Council on a beaver analogue study designed to encourage beaver occupation and improve the abundance of over wintering habitats (channel complexity, low velocity micro habitats, floodplain connectivity, etc.) for parr and smolt stage salmon. This last year the study area was reviewed by Department Staff along with staff from NOAA fisheries. A number of critical discoveries were made during this study that will help projects such as this continue into the future. ODF will continue to support these activities where able to do so.

ODF is committed to continuing to support and improve riparian habitats. The overarching principles for fish habitat restoration are described in the Forest Management Plans. A number of timber sales that have potential stream enhancement opportunities were identified in the FY22 AOPs. The staff Aquatic and Riparian Specialist will perform field evaluations to ensure that fish species within the streams identified will benefit from the proposed project and may consult with ODFW fish biologists as needed. When field evaluations have been completed, the Aquatic and Riparian Specialist will determine which

of the proposed projects should move forward based on the potential benefits to fish while taking into account the limited amount of staff time available to administer the projects.

ODF has historically utilized the opportunity presented by its timber sale program to perform stream enhancement in the form of large wood placement in high priority streams within or nearby timber sales. This has allowed ODF to add instream wood to high priority reaches for the benefit of aquatic species while maintaining efficient use of the timber sale's move-in of equipment and other planning processes to minimize overall costs. During the planning phase work is done with our internal resource specialists and external partners to identify and prioritize potential projects. Completing the instream design work during sale layout enables the field foresters to work closely with the Aquatic and Riparian Specialist to design and implement an effective and efficient project that's compatible with the logging plan. To inform stream restoration actions, ODF utilizes Watershed Assessments, Strategic Action Plans from external agencies, Rapid Bio-assessments, and expert knowledge to prioritize aquatic restoration actions across Districts. These restoration priorities can then be implemented in conjunction with a timber sale, where compatible, or as a stand-alone project.

Timber Harvest Comments

Comments related to the state forests timber harvest program include:

- Increase harvest. Replacing dead and dying trees will make the forest more vibrant
- Reduce harvest, increase forest diversity and avoid mono-species tree farms
- Some Oregonians are "shortchanged" by the clearcutting and replanting cycle on state forests
- Leave forest management to foresters and not environmentalists
- Put a halt to the logging of old growth, or stands 80 years and older
- Concern ODF is managing the areas available for clearcut on an approximately 55-year rotation
- No clearcutting, focus on thinning dense younger stands
- Shift emphasis – make wood production a by-product of ecological restoration
- Adverse environmental impacts tend to disproportionately burden Black, Indigenous, and People of Color (BiPOC) and low-income communities
- Habitat Conservation Plan development process justifies conservative (reduced harvest) approach; Clearcuts in proposed Habitat Conservation Areas undermine HCP goals
- With timber prices dropping, ODF should re-evaluate trade-offs from harvest
- Recommend that riparian thinning in draft HCAs be planned jointly with federal and state agencies
- Combined proposed harvest levels at 190 mmbf is lower than IP target; encourages agency to raise harvest to meet this target
- Harvest levels are based on projections that are 10 years old and should be re-calculated
- Complex forest stands should not be clearcut in light of Forest Management Plan goals to achieve 17-20% of land base in complex stands.
- Require replanting on all clearcuts.

Response: The Annual Operations Plans seeks to balance the agency's legal obligation to manage state forests for social, environmental and economic outcomes, a concept commonly referred to as Greatest Permanent Value. State forests provide outdoor recreation, education and interpretation opportunities,

essential wildlife habitat, clean water, and sustainable timber sales that produce jobs and revenue that funds vital services in rural counties, local districts, and schools throughout the state.

On state-managed forests, modified clearcut operations exceed the minimum requirements of the Oregon Forest Practices Act. The agency's practices maintain key structural components such as individual and groups of live green trees, snags and down wood, adding forest complexity that will be carried over into the next newly developing stand. Each individual timber sale is evaluated for considerations regarding slope stability, water quality; and is surveyed for threatened or endangered species in compliance with the federal and state Endangered Species Acts.

The Oregon Forest Practices Act requires clearcuts to be reforested following harvest. More information on reforestation can be found under the ***Climate Change and Carbon Comments*** section above.

Existing scattered old growth remnant trees and old growth stands are reserved from harvest. The Northwest and Southwest Forest Management Plans guiding activities on western Oregon state forests define characteristics of old growth stands which begin to appear in unmanaged forests at 175 to 250 years of age..

Harvest Levels: Sustainable harvest levels were determined using modeling when district Implementation Plans (IPs) were developed. This modeling estimated both harvest depletions and growth for multiple decades beyond the IP term and is based on a non-declining flow constraint, meaning harvest levels had to increase or remain constant period to period. This included harvesting inside and outside of the mapped landscape design to achieve stand structure goals over multiple decades.

In the first decade of implementation of the current FMPs, significant amounts of thinning were completed. The ratio of modified clearcut to thinning harvest types was expected to fluctuate over the decades. When considering the rotation age for the current FMPs, consideration of the whole land base and fluctuations in harvest types and locations over time needs to be made.

IPs for several districts were recently continued for a short period while the Division focuses efforts on policy work pursuing a Habitat Conservation Plan (HCP) for western Oregon state forests. An analysis was done to determine the difference in the available land base between 2011 (when the IP modeling was run) and 2021. The analysis showed that constraints increased by less than 1% for Astoria, decreased by less than 1% for Forest Grove, increased by 1% for Tillamook, and increased by 18% for West Oregon due to increased protection of habitat occupied by threatened or endangered species. Western Lane District was not included in the analysis as their IP modeling was done more recently in 2017. Because this IP continuation period was short, and the Department has limited staff resources, it was decided the best use of staff resources is supporting the high priority policy work on the HCP, Draft Western Oregon FMP and supporting IPs, rather than revising the current IPs.

The FY22 AOPs were prepared to meet the harvest objectives in these IPs. The goal is to achieve the average of the Annual Harvest Objective (AHO) over the expected duration for the IP. Under normal circumstances, the volume proposed in an AOP will be near the AHO target. However, some events may result in an AOP volume that is farther from the AHO target. These events may consist of, but are not limited to, storm damage, insect and/or disease outbreaks, timber market conditions, and higher or lower than expected volume accomplishment in a previous fiscal years AOP during the IP period. If

events such as these cause a district to be above or below the IP AHO target, the volume in subsequent AOPs will be adjusted to balance out the average AHO over the entire IP period. For example, the Astoria District has a volume of 67.5 MMBF for FY22, which is below their IP target of 73 MMBF. This was done to adjust for previous years where the sold volume for an AOP was higher than the estimated planned volume. You can see how this is tracked and adjusted in Table 2 of the Astoria FY22 AOP Summary Document.

Harvest in draft HCAs: As mentioned above, the FY22 AOPs were developed under the current Forest Management Plans and Implementation Plans. FMPs are adopted as Oregon Administrative Rule (OAR), and the Administrative Procedures Act establishes procedures an agency must follow to adopt, amend, or suspend administrative rules. The FMPs have not been amended or suspended; therefore, the Division shall continue implementing them as adopted.

The FY22 AOPs were prepared to implement the current FMPs while giving consideration to the draft HCP strategies and objectives. Although AOPs are for a specific year, selection of a candidate pool of harvest operations for the AOPs begins two to three years in advance. This is done in order to work through the necessary Threatened and Endangered (T&E) species take avoidance surveys and to conduct reviews of the candidates with department resource specialists and ODFW fish and wildlife biologists. The FY 22 candidate pool was selected prior to the draft HCP Habitat Conservation Areas (HCAs) being delineated. When the HCAs were being drafted, they were located with the awareness and acceptance that ongoing planned harvest, including modified clearcut harvest, would occur in draft HCAs as ODF continues to implement the existing FMPs and IPs until such time as an HCP is adopted. ODF biologists included these areas within HCAs because of their contribution to interior habitat and landscape connectivity as they grown into mature stands over the draft HCP permit term.

Although harvesting in the draft HCAs is occurring, a collaborative approach with biologists, technical resources specialists, planning staff, and district staff was used to find a balance between working with the available candidate pool to meet IP objectives and giving due consideration to the draft HCP strategies and objectives. This included reducing planned modified clearcuts inside draft HCAs. Where it was not possible to meet IP harvest objectives outside of draft HCAs alone, candidates located within the draft HCAs were reviewed with the biologists, and the candidates that had simpler stand structure, lower quality habitat, or forest health concerns were prioritized for either modified clearcut or partial cut harvest. In addition, ODF strived to maintain connectivity, configuration, and other patch dynamics that maintained or promoted the landscape function of these stands. Green tree, snag and down wood retention in modified clearcuts within draft HCAs will be guided by the legacy retention strategies in the draft HCP. Partial cuts (including thinning that extends into riparian areas) will be designed to develop forest structure to meet FMP goals and provide habitat.

Consideration was given to public comments received regarding harvesting within the draft HCAs and currently layered stands. In response the alternate sale named Keesler in the Astoria District, has been dropped from the AOP.

The table below shows the number of acres within the original candidate pool of harvests for both FY22 & FY23 inside the draft HCAs and how the acres were reduced as much as possible.

	FY22 Modified Clearcut	FY22 Partial Cut	FY23 Modified Clearcut	FY23 Partial Cut
Original Candidate Pool (Primaries & Alternates)	2,868	1,284	1,228	1,800
Approved (Primaries & Alternates)	987	1,074	0	1,800
Approved Primaries Only	577	717	0	1,475

Historically, alternate sales in an AOP would typically become primary sales in the next AOP. ODF's intention is that alternate modified clearcut sales within the draft HCAs in the FY22 AOP will not roll into the FY23 AOP. They will be dropped from the candidate pool of future clearcut harvests if not needed as a replacement for a primary in FY22. As the table above shows, the goal is to minimize acres of modified clearcut within draft HCAs in FY23. Partial cutting within the draft HCAs will continue with the goal to move the stands towards a more complex stand structure.

Harvesting in complex stands/Performance Measures: ODF does harvest some layered stands outside of the mapped landscape design for the Desired Future Condition (DFC) in the District Implementation Plans. Having an active management framework for state forests with Forest Management Plans that intend to maintain a large component of older forests means harvesting older trees throughout the life of the FMPs and is in alignment with agency policies and plans. Our inventory shows that levels of complex stands are increasing across the landscape adding approximately 5,000 acres over the last two years (increasing complex structure from 10.2% to 11.2%, using Stand Level Inventory (SLI) 2017 to SLI 2019) for the combined Astoria, Tillamook, and Forest Grove Districts. While putting together the FY22 AOPs from the surveyed candidate pool, agency staff looked for stands that were both outside of the mapped DFC and outside draft HCAs for harvest. Some of those stands happened to be currently layered stand structure. The harvesting of these stands was a tradeoff decision in order to minimize the amount of modified clearcut harvest within the draft HCAs while still meeting the IP objectives.

Thinning Stands: The implementation of Forest Management Plans is meant to be looked at in a multi-decadal view. Stands are evaluated on a yearly basis at the district level to determine if they are in need of thinning. The quantity of the thinning acres rises and falls as stand conditions change. The FY22 plan is a good example of this as the level of thinning acres is higher than previous years. For the Northwest Districts primarily young stand thinning will occur to improve growing conditions within the stands. In some areas older stand thinning will occur with the goal to accelerate stand structure development and improve wildlife habitat. Significant levels of thinning were done during the first decade of FMP implementation – and now less is needed in the second decade. In the Eastern Oregon Region, thinning is focused on fuel mitigation and a continuation of uneven aged stand management.

Additional information about thinning in draft HCAs is discussed above in the **Harvest in draft HCA's** section.

Roads, Slopes, and Water Quality Comments

- Concern that logging in steep slopes increases landslide and sediment runoff risk
- Recommendation to increase no-cut buffers on non-fish and headwater streams
- Perception that clearcutting increases mudslide and sediment runoff risk, impacting watersheds and water quality.
- Concern over road investment prioritization Water quality and quantity as well as flood prevention should be considerations in forest management
- Recommendation to have more thorough environmental review for water quality
- Recommendation to minimize road construction to avoid waterway impacts and habitat fragmentation, and when building new roads minimize sediment introduction to waterways

Response: The Forest Management Plan and associated policies are designed to ensure forest resources are protected and that natural processes fundamental to healthy forests continue. Landslides are important natural geological processes, which introduce large wood and gravel into the stream network. Large wood and gravel inputs are critical to fish habitat, spawning and rearing. The Department evaluates every sale for landslide potential and maintains trees on slopes that have connectivity to the stream system. This practice provides for wood delivery to the stream network should a landslide occur. There are strategies in place within the forest management plans that provide robust aquatic and riparian buffers that exceed Oregon's forest practices rules and include additional protection measures and tree retention for areas of potential unstable slopes such as inner gorges, initiation sites and their associated potential debris flow track reaches and high energy seasonal streams. Efforts are made to avoid using landscape-wide slope stability models which oversimplify the terrain, choosing instead to do site by site reviews. ODF strives to complete geotechnical reviews prior to finalizing district AOPs; however, some field consultations can't be completed prior to finalizing the AOPs or are more effectively done during sale layout. Further unstable slopes noted by foresters are addressed prior to finalizing leave tree strategies and all geotechnical concerns are addressed prior to finalizing a timber sale.

Roads: A well-maintained road system is necessary for a working forest and to provide the recreational access Oregonians increasingly demand. Road systems also provide access for fire response. ODF evaluates each timber sale and strives to build the minimum number of roads required, except where ODF has identified road systems that can be moved away from existing streams to mitigate hydrological issues. This may result in more road miles, but relocating roads away from the stream network is beneficial for watershed processes. All planned road construction is reviewed by the Geotechnical specialist to ensure that new roads are located to provide the best protection to natural resources while meeting the objective of the road. Hydrological connectivity surveys are performed on haul routes during sale layout. ODF prioritizes road improvement projects that reduce hydrologic connectivity and culvert replacements that are barriers to fish migration on active or planned haul routes and sites of opportunity near active or planned haul routes. Road maintenance investments are made to support forest operations, protect existing road infrastructure and water quality, and provide for safety improvements. ODF also closely monitors road conditions on active operations and performs additional

patrols and assessments during and after inclement weather events. Additionally, ODF cooperates and coordinates with local watershed councils, as well as private and federal neighboring landowners, to improve road systems.

Fire and Mitigation Comments

- Some stated that state forests should be more actively managed through thinning and removing fuels that could help fire spread quickly.
- Greatest permanent value could be better met by considering community fire resiliency in management decisions
- Older tree stands generally fared better in the Beachie Creek Fire

Response: Managing for resilient, fire-adapted forests is the primary approach to wildfire mitigation. There is a clear link between forest health and the potential for wildfires. Forest health includes addressing issues such as invasive species and insects and disease as discussed in District IPs and AOPs. Listed below are some other strategies that are used to reduce fire risk.

- Strategic fuel reduction projects that address excessive fuel loading but still meet long term goals such as the roughly 3,000 acres of thinning proposed in the Gilchrist State Forest in the Klamath Lake District FY22 AOP. Rather than the removal of saw timber, these sales focus on the removal of overstocked, small diameter sub-merchantable trees to reduce fuel loading in a fire prone landscape.
- Roughly 3,100 additional acres are being thinned in the Klamath Lake (Sun Pass State Forest), Astoria, Forest Grove and West Oregon districts. These partial harvests will improve the growing conditions for the residual trees and reduced potential stress from drought to improve overall forest health and resiliency.
- Maintain roads and trails as potential fire breaks as well as facilitating fire suppression access needs.
- Continue outreach and enhance educational opportunities around wildfire prevention.
- Continue maintenance of registered fire ponds on ODF ownership and improve as appropriate.
- Installation of gates to help prevent public use during extreme fire condition and to control access when do have fires.

Various Comments

- Reduce political influence and allow trained foresters to make decisions on forest management.
- Consider trade-offs that come with timber harvest, such as loss of scenic values, increased fire hazard, and greenhouse gas emissions
- Sale layout sometimes doesn't take future sales into account, affecting safety and logistics.
- Specialist integration should occur early during project planning and not simply during sale layout
- Road placement issues: Astoria overemphasizing spur roads in areas that won't see harvest again for years, while Tillamook District not getting adequate road improvements near stands likely to be harvested in near future.

- Use more metrics and indicators to evaluate impacts of state forest management and progress towards Forest Management Plan goals
- Reduce pesticide use, and do not apply chemicals known to persist in groundwater

Response:

Planning Process: The AOP planning process is done using a collaborative method and spans several years. Resource specialists, planners, and district staff work together early and often throughout the process to identify and evaluate sale candidates and forest operations, make recommendations, evaluate tradeoffs, conduct field visits, and adjust as needed to develop the draft AOPs. Additionally, ODF collaborates with ODFW biologists during the planning stages of the AOP to review planned sales and forest activities, identify potential projects, issues, and additional field work, and make adjustments as needed. A public comment period is then held on these draft AOPs to get public input, identify concerns, and to make adjustments where possible based on the information received through that process. Once the AOPs are approved further refinement is done in the field as the specialists and field staff work together to implement the AOPs. In order to be efficient, field work is often finalized during sale layout due to the potential changes that come from public comment, new T&E sites, and to ensure that everything is addressed.

There were many comments received that made suggestions for sale and road layout, prescriptions, etc. The districts have reviewed these comments and have made some adjustments that will be noted in the individual District Summary Documents and others will be taken into account during sale layout. One such adjustment was to include an additional 20 acres with the Buckskin sale in the Tillamook District to improve the efficiency of logging operations. The majority of the requested sale area expansions are limited due to Forest Practice Act constraints, deed restrictions, or current landscape design policies. Due to prior storms, policies, and/or timber operations, several stands were identified that had different stand boundaries than the norm which necessitated logging through younger reproduction stands which is not ideal. The intent of these planned sales is to get these stands all on the same growth trajectory, so that they are managed as one stand moving forward.

Pesticide Use: Harvest sites by law must be replanted, and ODF strives to use the minimum amount of herbicides necessary to achieve reforestation success. After harvesting, vegetation that competes with newly planted trees rapidly re-colonizes harvest units. Herbicides are an effective tool to temporarily reduce competing vegetation which enables newly planted seedlings to establish and thrive, so there will be future forests for all Oregonians as well as the wildlife that depend on them. When using pesticides, it is done in accordance with the product label and all applicable rules and laws. Contractors hired to apply herbicides on ODF lands are closely monitored by ODF contract administrators (who are also licensed applicators). ODF uses ground-based applications where practical. However, shifting to primarily ground-based applications would significantly increase costs, present physical hazards to crews working on steep slopes. ODF encourages all concerned citizens to sign up in FERNS for notifications, as this is the easiest way to stay informed on upcoming operations.

Measuring FMP Progress: As mentioned previously in this document, work has begun on the draft Western Oregon Forest Management Plan. Part of this work includes developing metrics to assess the implementation of the FMP that are easy to obtain, can be monitored over time and won't change over the life of the plan. These metrics will be used in the monitoring program. Two important objectives of

the monitoring program are 1) to determine whether FMP strategies are implemented as stated and 2) to determine whether FMP programs and strategies are effective at achieving stated goals. ODF encourages your participation in this process. See information in the ***Climate Change and Carbon Comments*** section on becoming involved with the new FMP.

Out of scope

Broadly, comments that were out of scope include:

- Recommendations for lands not managed by ODF, such as other public land managers and private landowners.
- Comments regarding the ODF North Cascade District (Santiam State Forest); this AOP has not yet had a public comment period.
- Post-fire logging – there is minimal or no post-fire logging occurring in the Astoria, Forest Grove, Klamath-Lake, Tillamook, West Oregon and Western Lane districts
- Don't replant after fires – allow for natural regeneration. There is minimal post-fire replanting taking place on ODF-managed lands included in this comment period.
- Get homeless people jobs logging timber.
- Force non-profits fighting timber harvesting to pay for the losses