

# Public Comment Summary

## FY 2022 Phase 2 Annual Operations Plan for ODF North Cascade District

The Oregon Department of Forestry recently developed Phase 2 of the Fiscal Year 2022 Annual Operations Plan for ODF North Cascade District, which was heavily impacted by fire in 2020. Phase 2 consists of the Fern Ridge forest project in the vicinity of the Shellburg Falls Recreation Area. In order to engage with Oregonians, the agency held a 30-day public comment period from November 1-30, 2021. The public was notified via news release to media outlets in the Portland metro area and the Willamette Valley, as well as emails to citizens and stakeholders on ODF's mailing lists, the ODF website, and posts on ODF's Facebook, Twitter and Instagram platforms. ODF hosted an information session online to provide information and answer questions from the public and stakeholders. Public comment was accepted through the ODF website, email, or letter. Additionally, ODF presented information and took comment from the State Forests Advisory Committee.

In all, ODF received 14 individual comments and 212 email campaign messages directly related to the proposed plan during the comment period. 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.

## *Recreation, Education & Interpretation Comments*

Comments related to recreation, education and interpretation possibilities include:

- A desire for re-opening this area to the public as soon as it is safe to do so, although opinions differed on the level of post-fire treatment, such as hazard tree removal, necessary.
- Numerous comments supporting opportunities to educate the public on topics such as:
  - o Comparing different types of post-fire forest treatments in a publicly accessible environment
  - o Pre- and post-fire photos in kiosks that show prior condition, immediate aftermath and recovery
  - o Information on post-fire monitoring, particularly in important aquatic areas
  - o Benefits to local communities from state forest revenue
- Some expressed skepticism of the need for a demonstration of different post-fire treatments – some of which include logging, stating research points towards negative impacts of post-fire logging on mature forest development and ecosystem recovery.
- The plan should provide more detail on recreation area recovery, and the agency should be mindful of the economic benefits resulting from recreational infrastructure.

### **Response:**

**Recreation Plans:** The 2020 wildfires have severely impacted recreation opportunities in the Santiam State Forest. Operation of developed facilities will be suspended until facility repairs have been made and access into these facilities are deemed safe for public use. Recreation work will be focused on repair, replacement, and improvement of trail and facility infrastructure that was damaged by the wildfires. A

detailed list of planned activities can be found in the approved FY2022 North Cascade Annual Operations Plan in the Recreation section.

**Public Access:** Due to the extent of the damage, the restoration of forest resources will be a long-term endeavor and some areas may not be re-opened in the next few years. The North Cascade District has been working diligently to mitigate safety risks and restore forest resources, which has allowed for four geographic areas of the forest to be reopened to the public.

- Stout Creek: Limited public access to non-motorized use only
- South Block: Full public access
- Sevenmile Road: Full public access
- Niagara Road: Full public access
- Crooked Finger: Full public access

Maps of all current closures and open areas as well as specific road systems where access can be obtained and general guidelines for these areas are available at this website: [Restoring the Santiam State Forest](#)

**Demonstration:** The Fern Ridge project is located in an area that is easily accessible by the public which makes it a great location to be a demonstration of Greatest Permanent Value (GPV) forestry in a post-fire environment. This project will provide the visiting public with a look at a range of forestry management tools used by ODF and how the different management actions return a variety of benefits over time. Future visitors will be able to see the results of these various treatments as the forest recovers, and learn about the benefits of active management to local communities from state forest revenue, and the benefits that residual legacy structures have on stand development and wildlife species. Information on District wide post-fire monitoring planned activities can be found in the approved FY2022 North Cascade Annual Operations Plan in the Recreation section.

## ***Fish and Wildlife and Stream Enhancement Comments***

- Support for a no-harvest zone within the area of Shellburg Falls and Shellburg Creek, with hazard tree felling, with any dangerous trees to be felled in the direction of the creek when possible, to strengthen riparian habitat
- A clarifying question regarding road abandonment, associated stream crossing and hazard tree removal on the legacy road
- Greatest permanent value can be better met by providing public services such as improved habitat for fish and other wildlife

### **Response:**

While evaluating impacts from the burn, the District came across an abandoned road (approximately 0.1 miles), on ODF ownership that had a culvert at a stream crossing. This culvert will be removed, and this road segment will be vacated. No hazard tree removal will occur on this road as it is being vacated. Vacating this short segment of road will not affect public access to the State Forest.

## ***Timber Harvest Comments***

Comments related to planned timber harvest include:

- Differing opinions on the level of post-fire harvest that should occur both in the Shellburg Falls Recreation Area and in burned areas of the forest more broadly
  - o Support for the amount of post-fire harvest proposed in the plan, or a desire for increased harvest levels. Rationale included:
    - Active replanting establishes forest canopy faster
    - The revenue produced would help finance the recovery efforts and provide revenue to counties battered by 2020's wildfires
    - Some supporters of increased post-fire harvest expressed disappointment in the length of time between the fires and the associated planned timber sale, stating that wood quality has deteriorated significantly in that time
  - o Opposition to any clearcut post-fire harvest and a desire for selective hazard tree removal on roads. Commenters stated several reasons for their rationale:
    - Research in post-fire recovery shows that harvesting can destroy snags that provide useful wildlife habitat, disturb soils and slow plant regrowth
    - Some expressed philosophical objections to any commercial logging
    - While no one expressed outright opposition to hazard tree removal, some wanted to see a more selective approach. One suggested a metric of 1 tree length from the roadway as opposed to 1.5 tree length

### **Response:**

The Annual Operations Plan seeks to implement the agency's legal obligation to manage state forests for economic, environmental, and social values for the North Cascade District. The department is using several different management and reforestation approaches throughout the burn. These different approaches combined will create a diverse landscape that includes a variety of age classes, stand densities, snag arrangements, and complex early seral habitat. These approaches will also recover value from burned areas, create jobs, fund vital services and local schools, and provide for staff and public safety.

**Harvest Levels:** The FY22 AOPs were prepared in alignment with the harvest objectives approved in the 2021 North Cascade Implementation Plan. The initial estimate of harvest volume to be prepared and sold in FY22 is 8 MMBF. The harvest operation described in this Phase 2 plan provides approximately 1.5 MMBF in harvest volume. This combined with the harvest operations in the approved FY22 AOP – Phase 1 (6.5 MMBF) results in 8 MMBF.

**Roadside Hazard Mitigation:** The Roadside hazard mitigation planned for this project will selectively remove trees that pose a post-fire safety risk. Only trees or snags that meet the hazard tree criteria and that are within 1 ½ tree lengths (OAR 437-007-0200, 437-007-0225, 437-007-0500, 629-605-0400 and 2020 Fire Salvage and the Forest Practices Act Guidance) on either side of road will be removed. Hazard

trees or snags are defined as a tree or snag that has been damaged and can strike a target (people, infrastructure, or property) based on individual tree condition and generally follows these characteristics:

- Leaning and/or root-sprung trees or snags with a lean of >15 degrees towards right of way;
- Undermined, severed, or compromised root systems with <50% of structural roots remaining in the ground;
- Fire damaged boles of trees or snags with <50% cross-section of structural integrity and sound wood; or
- Trees or snags with multiple indicators including conks, bole cracks, extensive rot, v-shaped forks with embedded bark and open cracks, in conjunction with high-severity fire damage and a high likelihood of reaching the right of way.

Hazard trees or snags that are felled along roadways that are also within a stream buffer shall be felled towards the stream if possible and not removed. Trees will be evaluated on a case-by-case basis and the majority of trees in the roadside hazard mitigation areas may not meet the hazard tree/snag criteria. Portions of the areas identified for hazard tree assessment and removal may have no trees or snags removed.

## ***Fire and Mitigation Comments***

- Comments regarding fire mitigation generally stated that more removal of standing dead trees would reduce possibility of re-burn in future fires.

### **Response:**

Managing for resilient, fire-adapted forests will be utilized as the primary approach to wildfire mitigation. There is a clear link between forest health and the potential for wildfires. A variety of management tools will be used to improve forest health during the recovery and restoration of the Santiam State Forest. Salvage logging is one of the management tools we use to generate revenue and in conjunction with active replanting to ensure desired conifer stocking levels and sustainable and predictable timber production through time in desired locations. This management tool can reduce standing fuels, but it can also increase small ground fuels and produce drier fuels in the short term. When evaluating management tools foresters considered a variety of factors, taking into consideration current condition, burn severity, site condition, desired future condition, etc., in order to balance GPV benefits. Focusing on different management approaches throughout the burn area will not only result in a variety of future stand types and ages that will promote biodiversity it will also help mitigate longer-term future fire risk.

In addition to the considerations discussed above, listed below are some additional strategies that will be used to reduce fire risk as part of the longer-term restoration plan.

- Strategic fuel reduction projects that address excessive fuel loading but still meet long term goals
- 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.
- Continued maintenance of registered fire ponds on ODF ownership and improve as appropriate
- Consider wider planting densities and native seed sources during reforestation.
- Identify areas/opportunities for strategic pre-commercial thinning type work including surface fuel reduction and restoration of young burned stands
- Monitoring for pest outbreaks
- Coordinate with other ODF divisions where possible on fuel reduction projects, landowner assistance programs and grants and future fire risk mitigation planning.
- Work with adjacent landowners (private and public) where possible to ensure projects are scaled across multiple ownerships.

## ***Stand Condition Comments***

- Concern that the area was designated with a Designated Future Condition of Layered within the Forest Management Plan's classifications, and some of the area had reached that stage already prior to the fire.
- Some commenters stated that post-fire clearcut harvesting sets back the area's progression to a Layered condition.

### **Response:**

**Pre-Fire Stand Condition:** The pre-fire stand condition for Unit 1 of the Fern Ridge project is Understory (UDS) as is stated in the individual Pre-Operation Report for this sale in Table 3. Additional information can be found in the summary document in the Table A-2 Forest Resource Summary.

**Desired Future Condition (DFC) Complex:** The overall long-term DFC Complex target for the Santiam State Forest is 35% and is designated in a functional arrangement across the landscape. This is a long-term target estimated to take 70-90 years to achieve using a variety of management tools including active management. The mapped landscape design was established during the creation of the 2012 North Cascade Implementation Plan (IP) with input from ODF resource specialists and wildlife biologists and Oregon Department of Fish and Wildlife (ODFW) wildlife and fish biologists and has not changed as a result of the fires or subsequent post-fire harvest operations. Instead, the post-fire operation prescriptions for this project were designed using a variety of management tools including leaving snags and green trees within Unit 1 combined with no harvest prescriptions in Units 3 and 4 and leaving unburned stands outside of the project area will provide a mosaic of legacy structures that will contribute to wildlife habitat and forest complexity at both a fine scale and the landscape level. This combined with utilizing a variety of reforestation methods will move these areas towards the long-term DFC goal.

## ***DRAFT Habitat Conservation Plan Comments***

- Much of the area would likely be designated as a Habitat Conservation Area under the draft Habitat Conservation Plan (HCP) under development, but this designation does not exist under

the current Forest Management Plan. The agency received differing opinions on how these potential HCAs should be treated.

- One expressed concern that harvest within HCAs violates the spirit of the HCP work and may render them less suitable as habitat to contribute to the conservation requirements that would be included in the plan.
- Noting that the HCAs are not designated under the current FMP, one commenter recommended that the agency should not be incorporating elements of the HCP that have not yet been approved by the Board of Forestry.

**Response:**

**Management within Draft Habitat Conservation Areas (HCAs):** The agency is working diligently to secure an HCP and an Incidental Take Permit with the federal services. The current Forest Management Plan is the basis for all planning and operations decisions, which will be the case until the Board of Forestry reviews and decides to adopt an HCP and new FMP.

The current FMP contains significant conservation strategies, most prominently those associated with forest structure. Additionally, consistent with the Greatest Permanent Value mandate, we have looked for opportunities to incorporate draft HCP conservation approaches into our management planning and operations. This balance has been incorporated into this project using a combination of management prescriptions (including areas of no management), green tree retention, and higher levels of legacy structure (snag and down wood) retention requirements combined with social and economic benefits.