
Elliott State Forest Management Plan Public Comments Reponses:December 2005

Topic <i>Aquatic-Riparian</i>

Sub-topic**Scope** **FMP**

Comment Number 161

We have attached our Scoping Comments to the USFW on the Elliott State Forest HCP DEIS, June 23, 2005. Please consider our comments in that document on Aquatic Resources. In particular, consider impacts from cumulative effects of clearcuts under 30 years old on the watershed.

Aquatic habitats on the Elliott are not sufficiently protected from the effects of cumulative clearcut harvest openings. For instance, some timber sales in the 2006 Annual Operating Plan are proposed directly across a stream from recent clearcuts. Trout Head, Area II, is directly on the other side of Trout Creek from Dry Moby that was logged in the spring of 2005. Bowl Bound Beaver is immediately across Beaver Creek from the Lower Beaver sale, clearcut in 2004. These fish bearing streams have as little as 75 feet buffer each side, for a total of 150 feet wide strip of forest between the clearcuts, except for yarding corridors that go through the buffers. The ODF should address cumulative watershed effects in the new plans.

National Marine Fisheries Service says cumulative impacts cause problems: “Watershed processes resilient enough to withstand disturbance from a single, site-specific action may be overwhelmed by the cumulative effect of multiple, widespread actions over time. Cumulative effects may impact ecological processes over large scales—resulting in a loss of habitat quality throughout a watershed. Effects assessments that identify potential risks solely for individual actions do not consider the complex interactions between upland, riparian, and aquatic processes which determine and sustain watershed health. They have therefore contributed to many of the current problems with water quality, habitat degradation and species status.

Response

The potential for cumulative effects is addressed through the combination of the overall landscape strategy and site specific strategies for riparian areas. The landscape strategy through basin targets, will keep a large percentage of the forest in advanced structure at any point in time. This minimizes the potential for cumulative effects on stream flow. Site specific strategies further minimize potential cumulative effects by reducing risk to water quality and fish habitat at a site specific scale. Additional stream miles with leave tree requirements that previously were not required, further reduces the risk of cumulative effects.

The Elliott Watershed Analysis did not identify cumulative effects as a potential risk. Specifically, it concluded changes in large peak flows were not expected if managed with the forest management plan.

We recognize the plan does not eliminate the potential for cumulative effects. It is essential that the strategies be viewed in an adaptive management context. Over time, monitoring will tell us if the strategies are accomplishing their intended purpose, including reducing the risk of cumulative effects. As monitoring provides feedback, the plan will be fine-tuned and improved through adaptive management.

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Scope

HCP

Comment Number 216

Assumption that HCP riparian configurations are an overall benefit to aquatics requires further support to be defensible.

The proposed riparian buffers are new on some stream miles (Large and Medium Type Ns), but constituted reductions in the overall size of the no-harvest areas most riparian areas (given that most are not in mature condition, which is the point at which the inner zone becomes no-harvest). To compensate for management within buffers and for the low basal area of younger riparian stands, an outer managed retention zone is added.

Key outstanding issues include:

What criteria will be used to determine if conditions exist where silvicultural manipulation of riparian stands is likely actually to produce a net benefit to stream health? We suggest (as is indicated in the Chapter 8 discussion) that this is true only in limited circumstances, given short-term impacts tradeoffs, and that these circumstances should be specified based on best available science and models.

What is the underlying risk associated with current and future (same) forest management on high landslide hazard locations? This must be evaluated in order to assess the adequacy of proposed management. While leave-trees in debris flow tracks may be capable of maximizing the potential habitat-forming capabilities of these events, there do not appear to be adequate management safeguards to ensure that harvest on landslide-prone slopes is not changing the natural rate and timing of landslide initiation. Increased risk of these events must be considered as part of the incidental take associated with the HCP.

How significant are the riparian enhancements over the OFPA? Also, while the extension of a 160-foot RMA width to Large and Medium Type N perennial streams is a laudable development, but it does not constitute the addition of many stream miles on the Elliott. What evidence is there that the wider managed buffers really mitigate for increased the impacts from harvest in the 25-160 foot area as compared to the previous 100 foot no cut buffer? What evidence is there that the retention on debris torrent streams will be adequate to ensure that landslide events from initiation sites have near natural impacts on streams in terms of travel distance, sediment, gravel delivery and large wood?

What is the justification for less protection for ponds, seeps and springs in this HCP versus the Washington Forest Practices HCP, which covers many of the same non-salmonid species?

Response

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These types of comments about HCP effects will be addressed in the EIS process.

1. We agree that silvicultural manipulation should only be applied when it is likely to promote the goal of a mature conifer stand in a timelier manner than if it had not been managed. This will likely only take place when the adjacent upland is being thinned. When the adjacent upland is being clear cut harvested riparian areas will mostly be left as not cut buffers.
2. The strategy on steep areas is to minimize effects from harvesting and to provide elements such as large trees in channels that may deliver to fish bearing streams.
3. (HCP DRAFT- Riparian-Related Question) The proposed plan only allows harvest in the inner RMA, which would only take place to achieve DFC in a timely manner. Harvest will not occur when MFC exists or conditions are suitable for development of MFC in a reasonable time frame. Any retention associated with the outer RMA is an increase over the current plans riparian strategy for the 100-160 ft zone. This is will result in a wider RMA than the current plan. In addition the proposed plan has leave tree requirements around debris-torrent prone channels that are not included in the 1995 plan.
4. (HCP-DRAFT -Justification for less protection for ponds, seeps, and springs than Washington). The strategies were developed by an interdisciplinary team including fish and wildlife biologists. The strategies are designed to maintain or achieve properly functioning aquatic habitats.

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Sub-topic Stream Buffers

Scope FMP

Comment Number 37

Why doesn't the proposed Elliott riparian strategy incorporate new research that shows increased light can increase productivity of streams that are not limited by high temperatures?

Response

The Elliott State Forest Watershed Analysis (Oct. 2003) found elevated water temperature the chief water quality concern on the forest. This analysis found it important to maintain cool water tributary streams and explore ways to improve water temperatures. Adaptive management can provide information to help consider changes necessary to the plan in the future and consider new research.

Comment Number 99

Another problem I have with the 2005 management plan is stream protection. First fish bearing streams should not be classified during summer low flow conditions, they should be classified during the spring time high flow conditions when fish are likely to use these small streams (esp. Cutthroat Trout). The forest management plans riparian protections for streams are completely inadequate. Stream buffers should reflect the potential of the trees to shade the stream and input large woody debris. These two major components of good fish habitat are missing from most fish bearing streams on the Oregon coast. In a coastal Douglas Fir/ Western Hemlock forest the stream side buffer should be at minimum 200 feet (one potential tree height) and probably should be more. To have no stream side buffers on non fish bearing streams is completely ridiculous. These high gradient streams provide the cool water to the streams that anadromous and non anadromous fish use. At least a minimum buffer of 25 to 50 feet should be provided to these small streams to shade them and protect there inner gorges from landslides and other potential erosion which chokes fish bearing streams. The lack of protection for streams in the Elliot State Forest is especially disconcerting to me because the Elliot is the headwaters to some of the most productive Coho Salmon streams in the State. A small loss of land for timber production could mean that some of the largest runs of salmon in Oregon could continue to recover and thrive in the future. The protection of these salmon runs would really benefit Oregons Children!

Response

The fish presence survey season for western Oregon is March 1-May 31. Surveys outside this period may be used to confirm fish are present, but not to classify a stream as non-fish bearing.

The site potential tree height on the Elliott is 160 ft which is the distance established as the Riparian Management Area. Fish-bearing streams will be managed for mature forest condition out to 100 ft with additional retention out to 160 ft.

The proposed plan does have riparian buffers on non-fish bearing streams, see table 5-3. Large and medium N streams will have a no harvest buffer out to 25 ft and manage for mature forest condition out to 100 ft and additional restrictions out to 160 ft. Small perennial N streams have a no harvest buffer out to 25 ft and additional restrictions out to 160 ft. These restrictions apply to the first 500 ft above confluence with fish-bearing streams and 75 percent of the remaining reach.

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Comment Number 106

I agree with the plans requirement to provide adequate buffers to streams to protect water quality.

Response

Thank you.

Comment Number 207

Narrower riparian areas to protect fish habitat and water quality. Urge ODF to reconsider recent science, which indicates benefits to riparian function from greater solar exposure, species diversity, landslide inputs, and disturbance mechanisms.

Response

The Elliott State Forest Watershed Analysis (Oct. 2003) found elevated water temperature the chief water quality concern on the forest. This analysis found it important to maintain cool water tributary streams and explore ways to improve water temperatures. Adaptive management can provide information to help consider changes necessary to the plan in the future and consider new research.

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Scope

HCP

Comment Number 162

The draft HCP states that within the RMA zone (25-100 feet from stream banks), the forest will be managed to develop and maintain “certain levels of mature forest conditions.” This ambiguous language should be changed to ensure that mature forest conditions are unquestionably maintained within 100 feet of a stream bank.

Response

Thank you for your comment, the document will be changed to reflect your concern. The inner zone from 25 feet – 100 feet will be managed to maintain or develop mature forest condition.

Comment Number 219

Current condition of riparian areas must be considered in evaluating effectiveness to fulfill their purported ecological roles in protecting instream and near-stream habitats

Only 35% of riparian areas area currently classified as having advanced structure, indicating that these areas are not fully functioning to protect the near-stream environment from the externalities of forest roads and clearcut timber harvest. Yet the bulk of the harvest activity under this plan will take place in the early part of the plan period.

Response

Effects of the HCP will be analyzed in the EIS process.