
Elliott State Forest Management Plan Public Comments Responses: December 2005

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| Topic <i>Timber and Stand Management</i> |
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Sub-topic**Scope** **FMP**

Comment Number 62

Support balance management between harvesting and habitat, therefore reducing conflict.

Response

The planners have attempted to develop a balanced plan that meets legal mandates and provides for the many types of forest values. The plan recognizes that economic, social and environmental benefits are interdependent.

Comment Number 68

Why target harvesting in basin #2, the most intact (highest %-82%) of advanced structure forest. Target the already fragmented basins.

Response

The basins that the planning team judged to have the highest value habitat for northern spotted owls, marbled murrelets, and salmonids, were given the highest percent targets for advanced structure. The fact that basin 2 was assigned an advanced structure target of 40% indicates that all the basins with a higher target were judged to have higher quality habitat. Therefore, based on the percent advanced structure targets, there were 9 basins that the planning team considered to have higher quality habitat than basin 2, and 3 basins with lower quality habitat. These decisions were largely driven by survey data for owls, murrelets, and fish, with the most weight assigned to listed species.

Comment Number 72

Check on second decade of the 1995 Plan-Draft volume graph at the meeting shows decrease and shouldn't show increase in second decade?

Response

The graph of the volume production for the 1995 HCP demonstrates the 1995 owl HCP implemented along with take-avoidance for the marbled murrelet. The decrease in the second decade is a result of discovering and adding more murrelet occupied areas. These areas become off-limit to harvesting indefinitely.

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Comment Number 82

The concept of “Structure Based Management” that was developed for the Tillamook Forest is an untested silvicultural practice that we feel may not be appropriate for a Douglas-fir forest on high site land near the coast. We suggest a trial period is warranted with a definitive process and timeline to evaluate this prescription. Our concern is that partial cutting may lead to the development of understory brush and coupled with the risk of blowdown, may result in creating brush fields with no conifer growing stock.

Response

Structure based management is not a silvicultural practice. It is a concept of creating stands with various structural components and composition using all the silvicultural tools available. There are many studies that show complex stand structures can be created through management. Even the question - Do management created complex stands function the same as natural complex stands? - is being answered by current research. All stands will not have the same pathway. Some stands will be managed for structures that emphasize timber production while others will be managed to create more complex stand structures. The Department is undertaking a monitoring project that will help determine if we are meeting these structural objectives. It is a carefully designed long-term study that will measure the development of stand structure over time. The objective is to cultivate stands whose composition and structure are suited to the site, while producing a sustainable source of revenue to the State and Counties.

Your comments about partial cutting potentially increasing the amount of understory brush and blowdown are valid concerns. Understory vegetation almost always increases with thinning. The species and amount of understory vegetation along with the management objectives of the stand determines whether this is acceptable or not. Wind damage is also possible when thinning very dense stands. Dense stands located in a wind prone area are susceptible to wind damage if the density is reduced too much during any harvest entry. These factors are considered when evaluating the potential pathway for a stand and developing the silvicultural prescription. Partial cutting is done very carefully in areas where experience shows that wind damage may occur. Since the early 1970's extensive areas have been thinned in western Oregon. While there are stands that experienced heavy wind damage resulting in unacceptably low stocking with a heavy brush understory, the majority have successfully meet the objectives of forest managers. Used in the appropriate situation, thinning is a viable silvicultural tool.

Comment Number 164

In just the first 10 years of the new plans, the ODF could build up to 35 miles of new roads in the Elliott. Instead, the ODF should have considered at least some helicopter yarding.

Response

ODF will only build roads that are necessary for management activities and will apply the best management practices in design, location and construction. In general, ground based operations such as cable yarding are more cost-effective than helicopter yarding. ODF has an obligation to use the most cost-effective means for harvest in order to meet its fiduciary responsibility.

Comment Number 181

Providing for early seral species is not necessary. The FMP assumes that “providing for the habitat needs of all native species will require producing all habitat types or surrogates.” We disagree. Providing for the habitat needs of all native species does NOT require producing all habitat types on the Elliott. Surrounding the Elliott is private land that provides an abundance of early and intermediate forests for wildlife that need that habitat. The ODF argues that “it is difficult to predict exactly how other landowners will manage their lands over the long term.” There is no basis for this argument. Industrial land owners manage their lands on short-rotation intensive forestry. If for some reason this suddenly changes, the Elliott can do adaptive management.

Response

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In order to meet the constitutional mandate to maximize revenue to the Common School Fund, it is necessary to harvest timber on the Elliott which in turn creates early structure. The plan attempts to provide an appropriate balance in the amounts of different stand structures on the forest.

Scope **IP**

Comment Number *171*

According to the draft FMP, the scattered tracks are mostly scenic, unique, and visual protected areas. Yet you are proposing to clearcut 4% of the advanced structure and 4% of intermediate forests¹³³ in the scattered tracks. The IP never told us where this cutting would be. Please tell us now.

Response

The most likely scattered tracts harvest areas to be accomplished in this ten year Implementation Plan would be on :

Tom Folley Creek Sec. 36, T21S R7W Douglas County
Cox Canyon Sec. 36, T26S R14W Coos County
South Slough Sec. 30, T26S R13W Coos County
Elliott Creek Sec. 20, T26S R13W Coos County

These locations are preliminary. Final locations and acreages will be stated in the Annual Operation Plans.

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Sub-topic Advanced Structure, Older Forest

Scope FMP

Comment Number 19

Advanced structure should be managed for timber production only.

Response

Advanced structure outside of conservation areas will be harvested over time, however, while it is on the landscape it contributes to other forest values such as native fish and wildlife habitat.

Comment Number 39

Why not use the same structure definitions as Tillamook? Use same definitions on all state forest.

Response

The structure definitions include the same forest development concepts as those used in other Western Oregon State Forests. The structure definitions were narrowed to three categories that were thought to be the most important to identify.

Comment Number 87

I am extremely concerned about the attitudes and actions of the current administration regarding environmental issues. It is so transparent the enabling corporate greed is the only motivation for overriding and/or rolling back environmental controls for logging (also oil drilling, ore extraction, power generation, etc.). These actions, under the guise of promoting healthy forests, preventing future forest fires and national security are shameful. At issue is our real national security-clean air, clean water and biodiversity.

My immediate concern is the logging of mature and old growth trees on public lands. Who are we to deprive future generations from experiencing the wonder of a true old growth forest? Who are we to destroy trees that have endured hundreds, and in some cases such as the redwoods and sequoias, thousands of years? What is the compelling need to take these trees at all? As the timber industry is so fond of pointing out, trees are a renewable resource. So let them focus on the single species, genetically enhanced plantations they have already created (which are also the most susceptible to destructive forest fires and disease.

Then there is the taxpayer issue. The Government Accounting Offices' own data show taxpayers are supplementing the timber industry's harvesting of the trees on our public land. This really adds insult to injury. Cutting old and mature growth on public land (and most especially by clear cutting) is clearly a business-friendly decision endorsed by less than ethical scientific experts whose data supports the highest bidder, in this case, the timber industry and the Bush administration.

Response

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This comment is outside the scope of the Elliott Forest Management Plan.

Comment Number *110*

We must protect the old growth, since they cannot be replaced.

Response

Remnant old growth stands of 20 acres or more were designated as conservation areas in the plan. These are stands that were at least 175 years old as of 2004. Other smaller patches or other individual trees of this age will be maintained during harvest operations as safety and operational constraints permit.

Comment Number *112*

We are particularly concerned with management of the Elliott because it contains some of oldest forests found in any of Oregon's state-owned forests. This plan will significantly raise logging levels on these lands in a way that is not sustainable for wildlife. Logging practices that are unsustainable for wildlife have a very real impact on the generation of steady revenue. If it becomes necessary to place greater restrictions on logging plans to protect declining wildlife, inconsistency and uncertainty over revenue generation will take the place of certainty. We do not agree with goals calling for regeneration harvest and partial cuts in older, mature forests. We also believe that the ODF's approach of logging Advanced Structure forest now with the hopes of growing more over 50 years place an unworkable burden on imperiled fish and wildlife. We believe all of the forests currently in Advanced forest structure should be protected and that ODF should take a hands-off approach where older forest already exists. Partial cutting treatments should be limited to younger forest stands growing back after past clearcutting. In early years, a variety of small diameter wood products could be produced from these stands to generate revenue, while in later years, more mature trees could be removed from the stands through thinning.

Response

We do not agree that the plan is unsustainable for wildlife. The technical aspects of the plan were developed through the combined effort of foresters, wildlife biologists and fish biologists and took into account Elliott-specific research, surveys and information about fish and wildlife species on the forest. The plan attempts to strike an appropriate balance of economic, social and environment benefits.

The forest is currently and will in the future be managed to produce a long-term sustainable level of timber harvest. The long-term sustainable harvest level for the Elliott State Forest has long been considered to be 50 million board feet (mmbf) annually. The Elliott is currently harvesting a little more than half that amount. Though there may be an increase in harvest under the proposed plan, the Elliott would still be growing significantly more every year than would be harvested. Modeling indicates that an annual harvest of 40 mmbf would result in an increase from the current 2.7 billion board feet of standing timber to about 3.5 billion board feet over the next 50 years.

A partial cutting only approach as suggested would not meet the constitutional mandate to maximize revenue to the Common School Fund over the long-term. Since thinning is relatively expensive and the volume per acre low, the revenue generated from a thinning-only approach would be a fraction of that currently produced under the 1995 plan. Thinning can and is used periodically to attain certain objectives for stand structure and to produce some revenue. But because Douglas-fir is a shade intolerant species, even-age management is the most efficient and productive method for managing coastal Douglas-fir forests.

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Comment Number 114

What appears to be the unstated overall strategy is to log heavy in watersheds with the most mature forests, and rely on current clearcuts regrowing to provide new owl and murrelet habitat. For instance, the Charlotte watershed currently has 85% "Advanced Structure", the most of any watershed on the Elliott (or perhaps on the entire central Oregon coast). The 50-year target is to reduce it to 40% Advanced Structure by clearcutting more acres here than anyplace else on the Elliott.

After 50 years, 11 out of 13 watershed basins will have their current Advanced Structure forests reduced. Currently 53% of the Elliott is Advanced Structure - most of which are native forests never before logged, recovered from the 1868 fire. After 50 years, the Desired Future Condition goal will hope to reduced that to as low as 40%, but that includes clearcuts that have (hopefully) regrown as Advanced Structure.

It appears as if the ODF is intent on liquidating and converting to young plantations massive amounts of the oldest forests on state lands, and this is simply something the Sierra Club cannot support. The statistics are startling. In 50 years, some 23,518 acres of currently existing Advanced Structure will be have been cut, nearly half of the total currently existing in the forest. Meanwhile, some 16,781 acres of current clearcuts will be regrown to replacement the lost Advanced Structure. It would be more sustainable and environmentally sound to focus management activities in these 16,781 acres and other currently clearcut stands to produce wood volume.

For the last 10 years, the Elliott has clearcut an average of 440 acres of mature forests every year, and thinned 400 acres of plantations. The new FMP 10-year implementation plan calls for annual clearcutting (and herbicide spraying) of up to 850 acres and partially cutting 1,500 acres of advanced and intermittent structure forests. This will produce between 40 and 45 mmbf a year even though the FMP target is only 40 mmbf. To put this in perspective, the surrounding Coos Bay BLM, with 3 times the land base, has an Allowable Sale Quantity (ASQ) of 32 mmbf a year. The Roseburg BLM has a half a million acres and has an ASQ of 45 mmbf a year. The Elliott wants to get 45 mmbf a year off of just 93,000 acres – this simply cannot be sustained. While it may be attractive to log more now for school revenue, these logging levels cannot be sustained, and the Elliott Forest must do more than simply generate revenue, it must also protect threatened and endangered species of fish and wildlife.

Response

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The overall strategy is to meet the constitutional mandate to maximize revenue to the Common School Fund over the long-term, using sound techniques of land management. The plan takes into account a wide range of economic, social and environmental values. Conservation areas were designated to protect the most important habitat being used by owls and murrelets. Advanced structure targets for specific management basins were based owl and murrelet habitat. The desired future condition is to develop 40-60 percent of the forest landscape in advanced structure arranged to provide better connectivity than currently exists on the forest.

We do not agree that the level of harvest being proposed is unsustainable. The long-term sustainable harvest level for the Elliott State Forest has long been considered to be 50 million board feet (mmbf) annually. The Elliott is currently harvesting a little more than half that amount. Though there may be an increase in harvest under the proposed plan, the Elliott would still be growing significantly more every year than would be harvested. Modeling indicates that an annual harvest of 40 mmbf would result in an increase from the current 2.7 billion board feet of standing timber to about 3.5 billion board feet over the next 50 years.

Because of the bi-modal age distribution of the stands on the Elliott, the amount of advanced structure will trend down for the first two decades but by the fourth decade of the plan the amount of advanced structure will exceed and remain above the amount that is on the forest today. In addition, the landscape design or arrangement of stand types on the forest will provide better habitat connectivity overall than exists today. In the mean time, the most important areas being used by owls and murrelets will be protected in conservation areas throughout the forest. At least 85% of the landscape at any point in time will be in intermediate or advanced structure providing important function for fish and wildlife habitat.

Most of the older stands on the Elliott have had some type of management through at least one thinning entry over the last fifty years. Though these stands resulted from the 1868 fire it is inaccurate to say they have never been logged.

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Comment Number 140

Advanced structure on the Elliott is not defined strong enough to protect endangered birds and fish on the Elliott. The definition is not adequately protective of old growth because it is likely that the older portions of the advanced structure will be logged first, and younger advanced structure (65-80 "recovered" clearcuts) are useless to old-growth dependent species like the NSO and MM. Particularly because maintenance of 50 percent advanced structure is supposed to provide a large component of the conservation strategy for NSO and MM, the definition of advanced structure must be refined. Maintenance of such structure will not provide sufficient mitigation of the logging contemplated under the FMP, and, thus, will not comply with the ESA.

Elliott's Advanced Structure vs. the rest of Oregon state forests: The ODF will implement only three structure definitions for the Elliott: Early, Intermediate, and Advanced. All the other Oregon state forests implement five structures: Regeneration,

Closed Single Canopy, Understory, Layered, and Older Forest Structure. Simplifying 'structure' definitions simplify forests and reduce protections for older forests and the wildlife that depend on them.

In the rest of Oregon state forests, "Stand Type 4- Layered" in the middle of the stand trajectories, has the same definitions as the Elliott's loftiest structure, "advanced structure", dominated by trees only 18" DBH. The Elliott does not have a distinct "Stand Type 5 Older Forest Structure" with at least 8 TPA 32" DBH and measurable specifications for snags and down wood²⁵. As explained in more detail below, all the specifications for "Older Forest Structure" are optional in the short-term in the draft plans.

In fact, the picture used to describe the advanced structure on the Elliott with an average of 18" DBH trees²⁶ is the exact same picture used to describe "Older Forest Structure" on the Tillamook, with 32" DBH trees. It is misleading to depict the Elliott's "advanced structure" with a graphic used to describe forests with entirely different specification in other state forests.

Advanced Structure is not advanced enough: "Advanced Structure", as defined in the draft plans, can't provide the quality of natural snags and cavity nests that marbled murrelets and spotted owls are dependent on,²⁸ or the same thickness of bark that other species (like bats) are dependent on. A number of studies have found both size and density of snags as well as amount of down woody debris to be an important component of spotted owl habitat.²⁹

The Elliott's draft FMP defines its oldest forests, "advanced structure", as having an overstory "dominated by trees of 18 inches or larger DBH and approximately 100 feet or more tall."³⁰ Compare this with the average Douglas fir on the Elliott that is 115 feet tall when the tree is only 50 years old³¹. A 100' tall tree is extremely small for a mature forest in the Coast Range. Only one half of the stand has to have overstory trees average 24" DBH or larger.

As the older FMP draft made clear, advanced structure will lack old-growth components: "decay and decadence required for old growth

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*characteristics are generally lacking, successional trees required by old growth may be lacking, and dead and down material required by old growth is lacking."*³² *This admission was removed from the current FMP draft. Why?*

The ODF does admit that: "Advanced structure stands... may develop structural characteristics typically linked with older forests or old growth. These stands will not necessarily emulate all of the processes and functions of very old forests." Yet, ODF still claims 65 year old forests will provide old-growth like habitat for nesting, roosting and foraging.

One excuse given for the weak definition of advanced structure is that "several wildlife species once thought to rely on old-growth habitat seem to prefer and use a variety of advanced structure stands." There was no footnote to this claim that old-growth dependent species don't really need old-growth at all. The ODF must back up this claim with peer-reviewed science, as it is the sole reason the Elliott has no 'Older Forest Structure' definition, like the Tillamook.

The HCP also assumes that the Owls can "adequately forage" in intermediate forests, 6 to 30 years old: "35-45 percent intermediate structure potentially providing adequate foraging habitat." The ODF should present some scientific basis for this conservation measure.

Response

The commenter is referred to Chapter 4 of the FMP and the following statement: "As the Elliott State Forest Management Plan is implemented, scientific research and monitoring will be necessary to determine if advanced structure stands can provide the functions of old growth, or if the characteristics of advanced structure stands should be modified to better emulate specific old-growth functions.: (p. 4-22) Also, Chapter 6 of the FMP states that one of the objectives of the monitoring program is "To determine whether FMP programs and strategies result in anticipated habitat or other conditions for the species of concern" (p. 6-5). The assumption that advanced structure stands are providing habitats for northern spotted owls and marbled murrelets is a key assumption of the plan that will be monitored.

There is some basis to believe that Advanced Structure stands will provide habitats for species such as marbled murrelets and northern spotted owls. The definition for Advanced Structure describes minimums that must be met for a stand to be classified as advanced structure. In reality, advanced structure stands are expected to exceed these minimums in many cases. The definition for advanced structure does not include all the characteristics that are important for specific wildlife species; hence monitoring will be an important component of the plan to ensure that all of these important characteristics are being provided.

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Comment Number 141

Trajectory Advanced Structure: The 2005 draft FMP and HCP “Advanced Structure” definitions differ. While the definition of advanced structure in the 2005 draft FMP lacked any measurable standards, the definition in the 2005 draft HCP, is down right confusing. Why are the definitions different for the FMP and the HCP?

The draft HCP defines an additional standard not in the FMP: “stands on a trajectory to advanced structure”. Apparently, this is sort of a super advanced structure. Trajectory advanced structure stands must attain a measurable structures that the FMP only suggests might happen. Specifically, “trajectory advanced structure” needs to have 8 trees per acre (TPA) over 32” DBH, 6 snags per acre over 12” DBH, a specific amount of sound down logs, and “at least one large remnant tree per five acres.”

At some undefined point in the future, not now, 50% of the advanced structure (at least 20% of the Elliott) must have “at least 8 trees per acre =32” DBH”.³⁷ But this requirement does not include any of the dead and down wood components of the “trajectory advanced structure”. Thus, the trajectory-advanced-structure forests are not really required anywhere on the Elliott. None of the Elliott is required to have the other specifications of trajectory stands, like the snags, down wood and remnant trees. This significantly weakens protections for endangered species and should be changed.

Trajectory advanced structure (defined in the draft HCP, yet not fully required on any of the Elliott) is the same specifications as the “Stand Type 5 – Older Forest Structure” defined in other Oregon state forests. So the questions remain:

33 Draft 2005 FMP page 4-21. Emphasis ours.

34 Draft Coos District Implementation Plan. Page 24. “Stands on the advanced structure trajectory may receive one or more thinnings and may attain this structure type by age 65.”

35 Draft 2005 FMP page 4-21.

36 Draft 2005 HCP page 6-12.

37 Draft 2005 HCP page 6-12.

** why is trajectory advanced structure not a separate structure, as clearly defined as in other Oregon state forests;*

** why is trajectory advanced structure only in the draft HCP, not in the draft FMP;*

** why are the full components of trajectory advanced structure not required anyplace on the Elliott?*

The draft plans never explain what the “trajectory advanced structure” will be used for. I asked ODF. Robert Hall responded: “The “trajectory stand” locations will be selected in such a manner so as to make contributions for other landscape objectives, such as connectivity, limit early structure proximity to T&E cores, contiguity of advanced structure and patch size.”³⁸ This information needs to be moved out of email and into the Forest Plan.

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Perhaps about half of the Advanced Structure currently on the Elliott already meets the specifications of trajectory Advanced Structure.³⁹ Unfortunately, there were not maps of any of the stand types in the draft FMP or HCP. The draft HCP requires the 10year Implementation Plans to identify these areas, yet in the very first draft IP, there are no maps or other identification of these areas. The ODF wrote to me:

“Only “draft” trajectory stands have been selected, to my knowledge there has not been a concerted effort to validate these selections which would necessarily occur before a map could be made available for distribution.”⁴⁰

But we are being asked to comment on these draft plans now. Without meaningful definitions and maps, meaningful comments are not possible. When are the draft trajectory stands going to be “validated” and mapped, so we can comment on them?

Response

We will clarify the language referring to advanced structure. Advanced structure is described in narrative fashion in Chapter 4 of the August 2005 draft FMP. Chapter 4 describes concepts for the FMP. Page 5-10 in Chapter 5 provides a more quantitative description of advanced structure. The HCP provides commitments in regard to the amount and quality of advanced structure. The 10-year Implementation Plan will identify areas for harvest and areas being managed for advanced structure.

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Comment Number 143

Creating new habitat for endangered species is problematic. The 2005 drafts of the Forest Management Plan (FMP) and Habitat Conservation Plan (HCP) depend on stands as young as 65 years old⁴⁵, regrown from old clearcuts, to fall into the “advanced structure” category that provides northern spotted owl (NSO) and marbled murrelet (MM) nesting habitat⁴⁶. Meanwhile, close to half of the currently existing, native, old forests on the Elliott will be clearcut over the next 50 years. For instance, the Charlotte watershed currently has 85% “advanced structure”, the most of any watershed on the Elliott (or perhaps on the entire central Oregon coast). The 50-year target is to reduce it to 40% advanced structure by clearcutting more acres here than anyplace else.

After 50 years, 11 out of 13 watershed basins will have their current advanced structure forests reduced. Currently 53% of the Elliott is advanced structure. Most of this is native forests, never before logged, recovered from the 1868 fire, containing important legacy components. After 50 years, the Desired Future Condition goal will reduce that to as low as 40%. It could be lower since 40% includes old clearcuts that have regrown as advanced structure.

In 50 years⁴⁷:

- * 23,518 acres of currently existing advanced structure will have been cut,*
- * 27,000 acres of currently existing advanced structure will remain uncut. Virtually all of this will be in HCAs and other protected areas.*
- * 16,781 acres of current clearcuts will have regrown into advanced structure to, in theory, provide homes for owls and murrelets.*

These figures were never directly included in the HCP or FMP, but it is important information to consider impacts to NSOs and MMs. It should be moved out of email and directly into the next FMP draft.

The ODF failed to provide any supporting science that indicates nesting habitat can be recreated in a timely way from old clearcuts. Yet the FMP justifies clearcutting in watersheds like the Charlotte watershed (likely the least fragmented owl habitat on the Elliott) because “several wildlife species once thought to rely on old-growth habitat seem

to prefer and use a variety of advanced structure stands.”⁴⁸ The ODF failed to provide any peer-reviewed science that old-growth dependent species can thrive in 65-year-old clearcuts.

The ODF’s working hypothesis for the new plans is to maintain the current numbers of endangered birds so they can repopulate old clearcuts. “...key habitat areas for specific species will maintain existing populations as a source to colonize new habitat. Species will colonize new habitat as it develops over the longer term.” This is the foundation of the entire HCP. The ODF failed to present scientific support for this hypothesis. The ODF says they will “Maintain existing owl and murrelet areas until new habitat develops.” This should say that ODF will maintain existing owl and murrelet areas until new habitat is occupied. If ODF has confidence in their hypothesis, the ODF should adopt this important change. It is inappropriate to count acres of “manufactured homes”, instead of counting the owls and murrelets that actually use them.

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Actually, there is good evidence that murrelet and NSOs do not do well in “recovered” clearcuts. “Late-successional forest communities are the result of a unique interaction of disturbance, regeneration, succession and climate that probably can never be created with management. At present, we do not even fully understand the structure, species composition, and function of these forests. The best we can hope to accomplish through silviculture is to at least partially restore or accelerate the development of some of the structural and compositional features of such forests. Because they will be regenerated by different processes during a different period from that of the existing late-successional forests, it is highly likely that silviculturally created stands will look and function differently from current old stands that developed over the last 1,000 years.”

The ODF assumes for the Elliott that: “advanced structure will be harvested on longer cycles ranging from 100-160 years. It generally takes about 80 years to develop the basic characteristics of more complex structures, and those stands will be retained for at least 20 more years to function as advanced structure”. The ODF assumption that large dead snags and other old-growth like structural diversity can develop in an 80 year old clearcut has no scientific basis.

The ODF failed to consider quality of the habitat. This was addressed by the 1993 Scientific Analysis Team (SAT) report that Jack Ward Thomas et al submitted to Congress in 1993:

“In the opinion of Scientific Analysis Team, assessments that do not account for the differential quality of habitats fail to fully assess the risks associated with habitat manipulation.”

“Lacking experience with selective cutting designed to create spotted owl habitat, such practices must be considered as untested hypotheses requiring testing to determine their likelihood of success. ... It is likely that some silvicultural treatments, which have been characterized as largely experimental, may well have an opposite effect from that expected. Consequently, such treatments may hinder the development of suitable habitat or they may only partially succeed, resulting in development of marginal habitat that may not fully provide for the needs of spotted owls. Results which fall short of the expected conditions could occur because of delay or failure to regenerate stands that have been cut, increased levels of windthrow of remaining trees, mechanical damage during logging to trees remaining in the logging unit, the spread of root rot and other diseases.”

This was written before the onset of Swiss Needle Cast, which adds another element of uncertainty on the Elliott State Forest. The SAT indicates that these comments apply equally to density management and patch cutting, both of which the ODF promotes in the new plans to enhance owl habitat on the Elliott. The SAT also cited concerns about the effect of logging on snags and down woody debris, which are essential features of owl habitat. Probably the biggest low-quality component of managed stands on the Elliott are the lack of large snags and down wood needed by owls to harbor their prey species and nesting opportunities.

Response

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We recognize that several of our strategies and approaches have not been tested over long time periods. However, there is a small but growing scientific literature on approaches to sustainable forest ecosystem management on which we have built our management plan. This literature is cited in the FMP (e.g. Hunter and Calhoun, 1996; Franklin, et al. 2002; etc.). Please refer to App. B & C. These approaches all provide for many forest services and values. We believe that our approach of designating conservation areas with little or no management along with areas that emphasize production will achieve the goals of the FMP. We have designed a robust research and monitoring program to ensure that we learn from our experience and turn that learning around to inform our management. Please refer to Chapter 6.

Comment Number 166

The FMP says that old growth stands will be retained, but the definition of "old growth" is only "stands that are over 20 acres in size". This is stingy. All old growth should be protected, including old-growth in 10 and 15 acre stands. The ODF should disclose how many old growth stands under 20 acres will not be protected. Please change your protections of old growth to ALL the very rare old growth, not just a part of it. The draft FMP Appendix says: "Existing old growth in the district occurs as scattered individual trees, and occasionally as small isolated patches. Because the occurrence is limited, the Department of Forestry's intent is to retain all existing old growth to provide this element of diversity in present and future stands." The FMP here is not clear if the intent is to retain all existing old growth trees or old growth stands over 20 acres. The ODF should clarify this.

Response

Old growth conifer stands (per definition on page 4-22) that are 20 acres or larger in area have been identified as conservation areas on the forest. It is the Oregon Department of Forestry's intent through Strategy 4 - Legacy Components, to also retain most old growth conifer that occurs in smaller stands and patches or as single trees, subject to safety and operational considerations. More detailed information underlying implementation of this strategy is provided in Appendix "C". We believe Appendix C provides ODF's intent for managing legacy structures such as residual old growth. Language in Appendix C will be clarified in regard to retaining residual old growth, subject to safety and operational considerations.

Comment Number 167

The new FMP/HCP should use the same definition of old-growth as the current HCP, 156 years and older. "A mature and/or old growth forest stand. " in this document, refers to stands 156 years or older" Mature forests should be protected, as well as old-growth. "If remnant old growth is retained, but no new old growth will be developed, this means that old growth on the ESF will steadily or suddenly (e.g., by large wildfire) be lost until, eventually, none exists." Under the proposed plan, "old growth will gradually be lost from the landscape due to the inevitable natural disturbances"

Response

The existing HCP (1995) uses "In this document, refers to stands 156 years or older (160 year age class and up)" as part of the definition for late successional forest. The reason 156 years was used in the present HCP (1995) is that a 160 year rotation is the youngest age class in the long-rotation basins, and the basins with longer rotation lengths (160-240 years) were to emphasize late successional forest development. The accepted definition of "late successional forests" includes both mature and old-growth forests. Mature forests are generally older than 80-100 years, but less than 175-200 years. the most widely accepted definitions of old-growth forests describe them as being over 175-200 years old. One hundred and fifty six year old stands are considered mature forests, not old-growth forests.

Baring a catastrophic event, the amount of stands that develop old-growth characteristics in areas managed for special purposes, such as conservation areas and riparian areas, will increase. "This range of stand structures and their relative abundance across the landscape will remain reasonably stable, although individual stands will continue to change. Within the landscape will be a network of conservation areas. Some of the stands in these conservation areas currently are or will eventually become old growth as that condition is defined on page 4-22" (Draft FMP, 5-8).

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Comment Number 168

The ODF should also consider how it uses the term “second growth” in the plans. ODF has been applying the term “second-growth” to 150 year old native forests regenerated after the 1868 fire, as well as to plantations created by clearcutting old-growth that escaped the fire. We believe the latter is the appropriate definition. The term “secondgrowth” should not be applied to native, unmanaged forests that regenerated from the 1868 fire. The 1995 HCP uses the term “second growth” three times, always applied to a “managed forest”. The new HCP should continue to use the term like this.

If “second-growth” is applied to native forests regenerated from fire, then there is no such thing as first-growth. All forests in the Pacific Northwest originated from fire – some from a fire 500 years ago, some 300 years ago and some 150 years ago. Calling mature, native forests “second growth” brings them down to the level of an even aged plantation. Mature, native forests should be called a mature forest, a native forest, a virgin forest or old-growth if it is over 156 years old.

Response

The term "second-growth" is a forestry term in common use. The definition used most often, with slight variations is: a forest or stand that has grown up naturally after removal of a previous stand by fire, harvesting, insect attack or other cause. The stands created after the 1868 fire seem to fit this definition. The term seems to be more correctly used to describe naturally regenerated stands than stands regenerated by planting or other artificial methods. However, foresters usually use it to cover both naturally and artificially created stands adding to the confusion. There is not a negative connotation associated with the term second-growth, nor is there an age differentiation. The term "older second-growth" has been used to describe older forests, e.g., "Older Second Growth Forests of Eastern Vancouver Island and the Gulf Islands" (Ministry of Sustainable Resource Management, B.C)

The following definition has been added to the HCP glossary:

SECOND GROWTH -Trees that come up naturally after the first growth of timber has been cut or destroyed by fire. Also known as young timber.

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Comment Number 174

ODF is not emulating historical structure. The ODF claims the HCP develops stand structures that “are designed to emulate the diversity of stand types historically associated with conifer forests in the Oregon Coast Range.” The ODF then claims that studies show “older stand types ranged from 30 to 70 percent of the landscape” or “15 to 85 percent of the landscape at any point in time.”

What the ODF fails to point out is that these percentages of “older stand types” are really old – like 300 years old, not 160 years old. The ODF claims that they will emulate historical diversity because “decades in the future... individual stands will move in and out of the various types at a relatively even rate.” Historical diversity moves stands in and out of stand ages at the rate of hundreds of years, or thousands of years across a landscape. The ODF failed to note they will speed this up dramatically. Advanced structure stands will not be allowed to get older than 160 years old, and most will be harvested at less than 100 years old.

Another problem is that ODF is emulating the lowest end of the historical acres of older forests, never the middle or higher end, and therefore is not emulating anything historical at all. After 50 years, 27,000 acres of currently existing advanced structure will remain uncut, or about 28% of the forest. If the historical range of “older stand types ranged from 30 to 70 percent of the landscape”, managing for 28% of the forest on older stand types doesn’t come close to the average historical regime. The ODF should retract their claims that 28% of older forests emulate the historical regime.

The Coos Bay BLM estimated the historical amount of old forests in the Oregon Coast Range Province, including the area of the Elliott State Forest. They say: “At the watershed-scale, the historic mean covers of late-successional and old-growth forest were estimated as 70% and 45%, respectively (Wimberly et al. 2000).

... Cover by late-successional forest was estimated to be weighted towards much higher cover, > 45% >75% of the time.” In other words, about 45% was old growth. It will never be more than 28% on the Elliott. The BLM analysis also says 45% of the Coast Range was covered with late-successional forests more than 75% of the time. This is greater than the 30% the Elliott claims was the lower range of the historical regime.

The BLM cites another study: “Cover by late-successional forests at the province-scale was estimated at 66-77% over the last 3000 years; cover by old-growth, a subset of late-successional forest, was estimated at 39-55%.” The ODFs should emulate this historical structure instead.

While the Elliott purports to emulate historical conditions with small 100-acre patches of older forests, “Historic late-successional patch size was large. Mean patch size for late-successional forest in 1936 forest type map was almost 10,000 acres (Table H-2) at the watershed-scale; mean late-successional patch size at the province-scale was similar. ... Virtually all late-successional patches functioned as interior habitat, historically.”

In contrast, virtually all of the Elliott’s late-successional patches are influenced by edge effects. “There are no differences between late-successional interior area cover and total cover by late successional forests in 1936 cover maps.... Edge habitats made up a small part of the

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landscape. Late-successional habitat was clumped (> 0.76), as were young structural types (Table H-2), due to the high intensity/low frequency disturbance regime.”

On the Elliott, the ODF strategy forces old-growth dependent wildlife to live in forests much younger than they have traditionally, in forests that have recently (within 100 years) been clearcut and lack historic structural legacy material, and in forest patches that have virtually no interior habitat. The next draft of the plans should not claim to emulate historical structure.

The History Chapters are Incomplete. The Implementation Plan, FMP and HCP forgot to mention the huge amount of common school fund land that was lost to the timber industries due to fraudulent land deals in the early part of the 20th century. The 1995 FMP mentions it: “Between 1859 and 1912, all but 130,000 acres of the forested lands passed out of state Ownership... some lands changed ownership through fraudulent land deals.”. The 1995 HCP describes it: “Oregon’s grant included 3.5 million acres of grazing and forest lands. Eventually, all but 130,000 acres of the forest lands was either sold for the benefit of schools or lost through fraudulent land deals.”. Why have all of the 2005 plans eliminate this part of the history?

Response

ODF's primary objective for the Elliott's common school lands is to maximize revenue over the long term, while being in compliance with all state and federal laws. The proposed plan does not intend to exactly emulate what may have been the condition of pre-settlement Oregon Coast range stand types. Sustainable forest ecosystem management as described in this plan is designed to emulate many aspects of natural stand development patterns, as well as designate portions of the forest for biological refugia. Some of this will be old growth and some eventually develop many of the characteristics of old growth.

Loss of some Common School Lands through fraudulent land deals is mentioned on page 1-4 of the August 2005 draft FMP and on page 3-7 of the August 2005 draft HCP.

Comment Number 197

The Oregon Coast Range is one of the most dynamic regions in the world with forest influenced by wind, flood and fire. The proposed plan ignores that natural phenomenon. Rather than acknowledge the high frequency of disturbance on the landscape, the plan proposes fixed reserves, extended riparian buffers and extended rotations of 240 years. Considering that the Elliott grew from the aftermath of a catastrophic fire approximately 150 years ago and has been influenced by several extreme events since, extended rotations over a large proportion of the forest appears out of place.

Response

Recognizing the importance of disturbance events is one of the key concepts used during plan development. See page 4-14 of the August 2005 draft FMP. There is provision made in the plan for salvage and recovery of disturbance events such as wind and fire. Conservation areas for T&E species were identified because those areas are currently being used by owls and murrelets. These conservation areas are expected to be in place for the length of the plan, but are not considered to be permanent reserves.

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Comment Number 208

Reduce advance structure. Under our recommended "Wood Emphasis" alternative, the % of advanced structure would still be maintained between 30-40%, or only about 5-10% below the Proposed Alternative during the first 5 decades. The science to justify this marginal difference in advance structure % is highly untested. In our opinion, it would be prudent to stake the reduction of approximately 800 million bf (over 50 years) to achieve the presumed habitat benefit of an additional 10% of advanced structure across the entire forest landscape.

Response

ODF believes the this amount of advanced structure is will be needed to obtain an approved HCP. ODF believes a multi-species HCP will provide the greatest benefit to the citizens of Oregon by providing a sustainable, dependable timber harvest and management certainty.

Scope **IP**

Comment Number 142

Advanced Structures Percentages are incorrect and inconsistent. To further muddy the waters, the Implementation Plan has inconsistent percents of the current condition of advanced structure in each watershed. The draft HCP says: "All basins except 4 and 7 currently meet the target for advanced structure" This wrong. The implementation plan says that basin #7 meets its target, but identifies basins #4 and 13 as not currently meeting the target for advanced structure. When I pointed out this mistake to ODF, Robert Fields answered: "My numbers from 2004 data show that basins 4, 6, 7 and 13 are less than the targets... My numbers from 2004 data show basin 4 @ 47%, basin 6 @ 57%, basin 7 @ 58% and basin 13 @ 49%."

Since the IP said basin #7 had 63% advanced structure and basin #13 had 46% advanced structure, I asked if these basins had grown 5% and 4% into advanced structure, respectively, in just one year. Robert Fields answered: "I did not generate the numbers for the draft IP document, perhaps they used a different data set. It is of interest that the %s for basin #7 on page 49 show the 63% for advanced structure (current condition), but the total for all stand types is 105%."

Yes, it is interesting that the percents for basin #7 add up to 105%. All the misinformation and mistakes must be fixed in time for the public to submit meaningful comments that can be considered before a final decision is made.

Response

The inconsistencies pointed out need to be reconciled as pointed out by the commentor.

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Sub-topic Clearcuts

Scope FMP

Comment Number 26

I would like clearcutting to stop and for herbicide spraying to be stopped as well. These harmful practices are hurting humans and animals and plant species.

Response

Over 90% of the lands managed by the Coos District are Common School Lands. The mandate for these lands is to maximize revenue to the Common School Fund over the long term. This requires diverse silvicultural techniques, including clearcuts. For shade-intolerant species such as Douglas-fir, clearcutting is generally the most economical and silviculturally appropriate harvest method. Clearcuts are modified in the draft plan to retain habitat features such as large green trees, snags, and down wood.

In addition to achieving timber volume goals, providing a range of stand structures across the landscape emulates the natural range of variability. Clearcut and partial harvests across the landscape provide a range of patch sizes and habitats. Openings in the forest benefit many species, from western bluebirds to deer and elk. This variety is similar to the natural range of disturbances produced by wind, fire, flood, and native insects and diseases.

Clearcuts are a silvicultural tool that can be used in some stands to create a desired future condition of complex structure more rapidly for example, in a densely-grown stand where the trees have small crowns and little capacity to respond to thinning, or where a layered condition can be reached more quickly by clearcutting patches to release understory trees. Clearcuts may also be the best option for managing diseased patches such as *Phellinus weirii* (root rot) or Swiss needle cast infested stands.

The responsible use of herbicides is an important tool for achieving goals for managing upland forests. In applying herbicides, all label and Forest Practices Act requirements are followed. Typically on the Elliott, herbicides are applied once or sometimes twice over the rotation length of a stand. The Elliott Watershed Analysis provides a synopsis on the effectiveness of BMPs to protect fish and other aquatic biota. It suggests that the risk for contamination is at very low levels. For example the concentrations observed in studies of drift contamination equate to less than 0.001 - 0.03% of concentrations considered to be acutely toxic to fish (Rashin and Graber 1993, and Dent and Robben 2000).

BMPs designed to minimize risks to streams and humans include but are not limited to:

- No spray buffer zones are established around streams.
- Use of half boom techniques when applying herbicides near stream side buffers forces the active boom downward and results in little scatter to the side.
- All spray mixing and handling is done on landings away from stream channels.
- Spraying occurs only on calm dry days in order avoid drift contamination or wash off of spray from rain.

Suggestions for studies to monitor cumulative effects and the potential for site-specific stream contamination will be evaluated and prioritized in the context of the overall adaptive management plan.

References

Rashin and Graber. 1993. Effectiveness of best management practices for aerial application of forest pesticides. TFW-WQ1-93-001-127 pp.

Dent and Robben. 2000. Oregon Department of Forestry: aerial pesticide applicaton monitoring final report. Oregon Departemtn of Forestry, Salem OR.
http://oregon.gov/ODF/PRIVATE_FORESTS/docs/fp/ChemAppFinal.pdf

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Comment Number 85

Please stop clearcutting the Elliott State Forest. Clearcutting is not the answer to maintaining healthy forests and should be stopped immediately as a bad logging practice. The Elliott can benefit school children by commercially thinning plantations and by providing educational and recreational opportunities.

Please protect the Elliott's threatened owl pairs and their young and the declining marbled murrelets with improved management practices not more harmful clearcuts of old native forests. Forest restoration is needed, not forest elimination, further fragmentation, soil depletion and compaction.

Forest removal is contributing to global warming and the increase of natural disasters.

Response

Over 90% of the lands managed by the Coos District are Common School Lands. The mandate for these lands is to maximize revenue to the Common School Fund over the long term. This requires diverse silvicultural techniques, including clearcuts. Relying on thinning of plantations alone would not meet the mandate to maximize revenue. For shade-intolerant species such as Douglas-fir, clearcutting is generally the most economical and silviculturally appropriate harvest method. Clearcuts are modified in the draft plan to retain habitat features such as large green trees, snags, and down wood.

Areas currently being used by owls and murrelets are designated as conservation areas in the proposed plan. These areas will be managed primarily to benefit these species. The landscape strategy of providing 40-60 percent of the landscape in advanced structure will support these conservation areas.

Comment Number 98

The next problem I have is the proposed clearcutting of young stands in long rotation basins. Middle Elk: 38 years old, Curvy Pucket: 40 years old, Double Barrell: 40 years old, and Ash Valley School: 65 years old should be changed from a prescription of clearcutting to commercial thinning as is required under the management plan. What is especially disconcerting is that Middle elk is in a 240 year rotation basin this means that it cannot be clearcut until it is 240 years old, not 38! Curvy Pucket and Double Barrell are in 160 year rotation basins and are only 40 years old! Ash Valley School is in an 80 year rotation basin and is in an area that is in a designated scenic management area. What is scenic about a clearcut with a 50 foot wide buffer strip. Please change the harvest prescription of these units from clearcut to commercial thin. These harvest units would still be economically viable with a prescription of commercial thin.

Response

Comments on specific sales is outside the scope of the proposed Forest Management Plan.

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Comment Number 102

Oregon's state forests should be more than a bank account for Salem and should in no way resemble the Industrial forests that surround the Elliot. This also means that the forest should not be a reserve, but should be carefully managed to produce high quality timber products and sustainable revenue for Oregon's school fund. Cutting at the level proposed in the 2005 management plan is not sustainable. Clearcut harvest is also not sustainable it requires to many inputs to manage the stands. Perhaps in the future the State forests will be managed with selective harvest and group selection harvest which is sustainable forest management.

Response

The forest is currently and will in the future be managed to produce a long-term sustainable level of timber harvest. The long-term sustainable harvest level for the Elliott State Forest has long been considered to be 50 million board feet (mmbf) annually. The Elliott is currently harvesting a little more than half that amount. Though there may be an increase in harvest under the proposed plan, the Elliott would still be growing significantly more every year than would be harvested. Modeling indicates that an annual harvest of 40 mmbf would result in an increase from the current 2.7 billion board feet of standing timber to about 3.5 billion board feet over the next 50 years.

Meeting the mandate for revenues from Common School Forest Land requires diverse silvicultural techniques, including clearcuts. For shade-intolerant species such as Douglas-fir, clearcutting is generally the most economical and silviculturally appropriate harvest method. Clearcuts are modified in the draft plan to retain habitat features such as large green trees, snags, and down wood.

In addition to achieving timber volume goals, providing a range of stand structures across the landscape emulates the natural range of variability. Clearcut and partial harvests across the landscape provide a range of patch sizes and habitats. Openings in the forest benefit many species, from western bluebirds to deer and elk. This variety is similar to the natural range of disturbances produced by wind, fire, flood, and native insects and diseases.

Clearcuts are a silvicultural tool that can be used in some stands to create a desired future condition of complex structure more rapidly – for example, in a densely-grown stand where the trees have small crowns and little capacity to respond to thinning, or where a layered condition can be reached more quickly by clearcutting patches to release understory trees. Clearcuts may also be the best option for managing diseased patches such as *Phellinus weirii* (root rot) or Swiss needle cast infested stands.

Comment Number 108

I am writing to ask that you protect the Elliot from any clearcutting and that this state treasure be protected. Not only for the sake of the marbled murrelets and the spotted owls, but for the sake of our children and future generations. In the years to come they need beautiful old forests to visit, clean air to breathe, quality water to drink. When people around the country think of Oregon, they think it is a place full of deep forests. Don't prove them wrong for the sake of short-term profits.

Response

Oregon's constitution mandates that Common School Land (over 90% of the lands managed by the Coos District) must be used to obtain the greatest benefit for the people of this state, consistent with the conservation of this resource under sound techniques of land management. These Common School Lands were given to the state at the time of statehood in trust to benefit schools. The constitutional mandate (greatest benefit) has been interpreted by the Oregon Attorney General to mean that Common School Lands must be used to benefit schools and maximize revenue to the Common School Fund over the long term. To accomplish these goals, the strategies in the draft plan are meant to produce dependable timber volume and revenues over the long term, while also providing resource protection for wildlife, fish, and other forest values. ODF believes the proposed plan will provide an appropriate balance of economic, social and environmental benefits to the people of Oregon.

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Comment Number 119

I am writing today to ask that the ODF stop clearcutting and herbicide spraying in them.

Response

Over 90% of the lands managed by the Coos District are Common School Lands. The mandate for these lands is to maximize revenue to the Common School Fund over the long term. This requires diverse silvicultural techniques, including clearcuts. For shade-intolerant species such as Douglas-fir, clearcutting is generally the most economical and silviculturally appropriate harvest method. Clearcuts are modified in the draft plan to retain habitat features such as large green trees, snags, and down wood.

In addition to achieving timber volume goals, providing a range of stand structures across the landscape emulates the natural range of variability. Clearcut and partial harvests across the landscape provide a range of patch sizes and habitats. Openings in the forest benefit many species, from western bluebirds to deer and elk. This variety is similar to the natural range of disturbances produced by wind, fire, flood, and native insects and diseases.

Clearcuts are a silvicultural tool that can be used in some stands to create a desired future condition of complex structure more rapidly for example, in a densely-grown stand where the trees have small crowns and little capacity to respond to thinning, or where a layered condition can be reached more quickly by clearcutting patches to release understory trees. Clearcuts may also be the best option for managing diseased patches such as *Phellinus weirii* (root rot) or Swiss needle cast infested stands.

The responsible use of herbicides is an important tool for achieving goals for managing upland forests. In applying herbicides, all label and Forest Practices Act requirements are followed. Typically on the Elliott, herbicides are applied once or sometimes twice over the rotation length of a stand. The Elliott Watershed Analysis provides a synopsis on the effectiveness of BMPs to protect fish and other aquatic biota. It suggests that the risk for contamination is at very low levels. For example the concentrations observed in studies of drift contamination equate to less than 0.001 - 0.03% of concentrations considered to be acutely toxic to fish (Rashin and Graber 1993, and Dent and Robben 2000).

BMPs designed to minimize risks to streams and humans include but are not limited to:

- No spray buffer zones are established around streams.
- Use of half boom techniques when applying herbicides near stream side buffers forces the active boom downward and results in little scatter to the side.
- All spray mixing and handling is done on landings away from stream channels.
- Spraying occurs only on calm dry days in order avoid drift contamination or wash off of spray from rain.

Suggestions for studies to monitor cumulative effects and the potential for site-specific stream contamination will be evaluated and prioritized in the context of the overall adaptive management plan.

References

Rashin and Graber. 1993. Effectiveness of best management practices for aerial application of forest pesticides. TFW-WQ1-93-001-127 pp.

Dent and Robben. 2000. Oregon Department of Forestry: aerial pesticide applicaton monitoring final report. Oregon Departemtn of Forestry, Salem OR.
http://oregon.gov/ODF/PRIVATE_FORESTS/docs/fp/ChemAppFinal.pdf

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Comment Number 122

The Elliott also provides clean water for all humans, forest creatures and fish and a beautiful public forest to recreate in. ODF should be reducing harvest to help protect the quickly dwindling Owl and Marbled Murrelet populations, not increasing logging.

Our school children should not suffer from the clearcutting of the Elliott State Forest. The Oregon Constitution requires the Common School Forest Lands to be managed "with the object of obtaining the greatest benefit for the people of this state, consistent with the conservation of this resource..." The greatest benefit for the people is to be able to leave healthy ecosystems and wildlife to our children.

Response

We agree that forest values such as clean water, wildlife habitat and recreation are important benefits provided by the Elliott. These values were taken into account as the plan was being developed, and strategies to achieve the goals for these resources were included in the plan.

The constitutional mandate for Common School Forest Lands requires the State Land Board to use the lands to obtain the greatest benefit for the people of this state, consistent with the conservation of this resource under sound techniques of land management. According to a 1992 Oregon Attorney General opinion, this means that the land must be used to benefit schools and maximize revenue to the Common School Fund over the long term. Accordingly, the draft plan seeks to produce revenue through harvesting of forest products, while maintaining and developing desirable fish and wildlife habitats and biological diversity. The draft strategies were developed by a multi-disciplinary team that includes wildlife biologists, and are intended to balance ecological and economic goals.

Comment Number 125

new plans for the Elliott should reserve from logging the oldest and best forests. ODF needs to adopt the conservation biology ethic of protecting the best and restoring the rest. Instead, ODF has proposed a "Structure Management" scheme that has worked poorly in other state forests which leaves few, if any, permanent reserves for wildlife. Everything is eventually clearcut. This must not continue. Currently, a proposed adoption of change to Structure Management might have ODF clearcutting between 3 to 17 mmbf MORE forests every year than they do now. This is unacceptable, very poor forest management, and biologically exceptionally destructive. All clearcutting must stop. ODF must move to selective cutting and maintainence of healthy old growth.

Response

The overall strategy is to meet the constitutional mandate to maximize revenue to the Common School Fund over the long-term, using sound techniques of land management. The plan takes into account a wide range of economic, social and environmental values. Conservation areas were designated to protect the most important habitat being used by owls and murrelets. Stand that are currently considered old growth are protected in conservation areas as well. Advanced structure targets for specific management basins were based owl and murrelet habitat. The desired future condition is to develop 40-60 percent of the forest landscape in advanced structure arranged to provide better connectivity than currently exists on the forest.

The long-term sustainable harvest level for the Elliott State Forest has long been considered to be 50 million board feet (mmbf) annually. The Elliott is currently harvesting a little more than half that amount. Though there may be an increase in harvest under the proposed plan, the Elliott would still be growing significantly more every year than would be harvested. Modeling indicates that an annual harvest of 40 mmbf would result in an increase from the current 2.7 billion board feet of standing timber to about 3.5 billion board feet over the next 50 years.

A selective cutting approach as suggested would not meet the constitutional mandate maximize revenue to the Common School Fund over the long-term. Since selective harvesting is relatively expensive and the volume per acre low, the revenue generated from a selective harvesting approach would be a fraction of that currently produced under the 1995 plan. Thinning can and is used periodically to attain certain objectives for stand structure and to produce some revenue. But because Douglas-fir is a shade intolerant species, even-age management is the most efficient and productive method for managing coastal Douglas-fir forests.

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Comment Number 133

The Elliott State Forest is Oregon's oldest state forest. This is history that should be taught and shared with all of all ages. Keep to the 1995 promise regarding the habitat of owls.

I am asking that Elliott State Forest be left along, along with all the other clear cuts in our beautiful state OREGON.

Response

The proposed plan was designed to provide protection for owls and to manage a portion of the forest for structural characteristics that can be used by owls. Clearcut harvesting is an important silvicultural tool that is used to meet the constitutional mandate of maximizing revenue to the Common School Fund.

Comment Number 139

I am concerned that the current management plan puts too great an emphasis on logging the remaining mature forests in the Elliot, further degrading this already highly industrialized forest.

This state forest should be managed for a full range of uses, including the care of the natural heritage that we are so fortunate to enjoy. So much of the Elliot is already in clear-cut rotations, and this plan includes proposals to destroy even more of the old valuable coastal forests.

I am especially alarmed by the lack of care shown to some of the key indicator creatures in this forest, such as the plan to destroy habitat for marbled murrelets, further degrade owl habitat, having failed to provide even habitat for 26 owls and all the inter-related species that they indicate the health of.

This forest is already logged too much. It has been left ugly and vastly reduced in it's provisions for either human recreation or nature.

Response

Oregon's constitution mandates that Common School Land (the majority of the lands managed by the Coos District) must be used to obtain the greatest benefit for the people of this state, consistent with the conservation of this resource under sound techniques of land management. This means using the land to benefit schools and maximize revenue to the Common School Fund over the long term. To accomplish these goals, the strategies in the draft plan are meant to produce dependable timber volume and revenues over the long term, while also providing resource protection for wildlife, fish, and other forest values.

The state forest lands will be managed for structure, such as large trees, diverse native plants, abundant snags and down wood, and functional riparian and aquatic habitats. These habitat features will be developed throughout the forest, in early structure stands (clearcuts) as well as in more complex stands. The intent is to provide a diversity of conditions similar to those resulting from the natural disturbances that have occurred over time. The draft plan also includes conservation areas to protect habitat currently being used by threatened and endangered species, scenic and steep areas, administratively removed areas, and inner riparian zones.

A proposed habitat conservation plan will include more specific strategies for owls and murrelets to comply with the Endangered Species Act.

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Scope

HCP

Comment Number

191

The draft HCP requires that: “Regeneration harvest of advanced structure may occur outside of the identified spatial landscape locations during the implementation period...”. Does this say that regeneration harvests of advanced structure may NOT occur inside identified spatial landscape locations? Where are the “spatial landscape locations”? Where are regeneration harvests allowed, or not, and why?

Response

What it means is that advanced structure can be harvested as long as the basin target is maintained. Foresters will identify areas for harvest and for advanced structure during the implementation planning process.

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Sub-topic Do not Cut Native Forests

Scope FMP

Comment Number 24

I am opposed to logging these lands. I believe the Dept. of Forestry uses incomplete economic analysis to validate logging. If the real costs to the environment including sedimentation of streams, loss of woody debris, old growth characteristics, and watershed integrity were figured into the mix in a fair way, it would demonstrate that protecting these forests and keeping as biological recovery units would have far more "benefits" to the state. I.e.

If you consider how much we are paying to recover salmon, for instance, and recognize that one of the reasons we are paying for this is due to changes caused by logging, than the that is a cost that could be avoided if there were no logging.

In general the public would be far better served by keeping the forests intact without logging. Conversion of Elliot State Forest to a recovery area and state park would be the most valuable way to serve the public and schools.

Response

Oregon's constitution mandates that Common School Land (over 90% of the lands managed by the Coos District) must be used to obtain the greatest benefit for the people of this state, consistent with the conservation of this resource under sound techniques of land management. These Common School Lands were given to the state at the time of statehood in trust to benefit schools. The constitutional mandate (greatest benefit) has been interpreted by the Oregon Attorney General to mean that Common School Lands must be used to benefit schools and maximize revenue to the Common School Fund over the long term. To accomplish these goals, the strategies in the draft plan are meant to produce dependable timber volume and revenues over the long term, while also providing resource protection for wildlife, fish, and other forest values.

The state forest lands will be managed for structure, such as large trees, diverse native plants, abundant snags and down wood, and functional riparian and aquatic habitats. These habitat features will be developed throughout the forest, in early structure stands (clearcuts) as well as in more complex stands. The intent is to provide a diversity of conditions similar to those resulting from the natural disturbances that have occurred over time. The draft plan also includes conservation areas to protect habitat currently being used by threatened and endangered species, scenic and steep areas, administratively removed areas, and inner riparian zones.

Comment Number 28

Keep the treasure of our public lands clean and healthy and available for use by the public. There really is plenty of private land for logging, and our schools really need a better funding plan to provide good education. Our public forests are valuable as educational and recreational places for all our children and their families. Our public forests need to be protected from poisons, and clearcutting, and the waters need to be kept clean and cold for healthy salmon. Please don't allow the deterioration of the few pristine and sacred places that revere and protect all life, regardless of cost. Please stop any clearcutting that might be considered for this state forest. Let us keep a place of health and beauty for all our citizens of Oregon (growing by leaps and bounds daily) to enjoy.

Response

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Oregon's constitution mandates that Common School Land (over 90% of the lands managed by the Coos District) must be used to obtain the greatest benefit for the people of this state, consistent with the conservation of this resource under sound techniques of land management. These Common School Lands were given to the state at the time of statehood in trust to benefit schools. The constitutional mandate (greatest benefit) has been interpreted by the Oregon Attorney General to mean that Common School Lands must be used to benefit schools and maximize revenue to the Common School Fund over the long term. To accomplish these goals, the strategies in the draft plan are meant to produce dependable timber volume and revenues over the long term, while also providing resource protection for wildlife, fish, and other forest values.

The state forest lands will be managed for structure, such as large trees, diverse native plants, abundant snags and down wood, and functional riparian and aquatic habitats. These habitat features will be developed throughout the forest, in early structure stands (clearcuts) as well as in more complex stands. The intent is to provide a diversity of conditions similar to those resulting from the natural disturbances that have occurred over time. The draft plan also includes conservation areas to protect habitat currently being used by threatened and endangered species, scenic and steep areas, administratively removed areas, and inner riparian zones.

Comment Number 29

Our old growth forests and state waterways are under siege. I request your support in strengthening our conservation laws to protect our state resources. The construction of logging roads should be halted and no more timber sales in native old growth forests. Oregon's environmental future is at stake.

Response

Oregon's constitution mandates that Common School Land (over 90% of the lands managed by the Coos District) must be used to obtain the greatest benefit for the people of this state, consistent with the conservation of this resource under sound techniques of land management. These Common School Lands were given to the state at the time of statehood in trust to benefit schools. The constitutional mandate (greatest benefit) has been interpreted by the Oregon Attorney General to mean that Common School Lands must be used to benefit schools and maximize revenue to the Common School Fund over the long term. To accomplish these goals, the strategies in the draft plan are meant to produce dependable timber volume and revenues over the long term, while also providing resource protection for wildlife, fish, and other forest values.

The state forest lands will be managed for structure, such as large trees, diverse native plants, abundant snags and down wood, and functional riparian and aquatic habitats. These habitat features will be developed throughout the forest, in early structure stands (clearcuts) as well as in more complex stands. The intent is to provide a diversity of conditions similar to those resulting from the natural disturbances that have occurred over time. The draft plan also includes conservation areas to protect habitat currently being used by threatened and endangered species, scenic and steep areas, administratively removed areas, and inner riparian zones.

Comment Number 50

Please protect the Elliott State Forest's threatened owl pairs and their young as well as the marbled murrelets with better management practices. We do not need more clearcuts of old native forests.

Response

The Elliott will be managed to maximize revenue to the Common School Fund and managed to provide structure, such as large trees, diverse native plants, abundant snags and down wood, and functional riparian and aquatic habitats. These habitat features will be developed throughout the forest, in early structure stands (clearcuts) as well as in more complex stands. The intent is to provide a diversity of conditions similar to those resulting from the natural disturbances that have occurred over time. The draft plan also includes conservation areas to protect habitat currently being used by threatened and endangered species, scenic and steep areas, administratively removed areas, and inner riparian zones. The plan was developed so that the overall landscape design will provide habitat for species such as the marbled murrelet and spotted owl.

Elliott State Forest Management Plan Public Comments Responses: December 2005

Comment Number 52

The value of protected public lands and old growth forest is immeasurable. It is extremely vital to protect right now, given all the environmental problems we face. There must be a few clean sanctuaries for people, plants, and animals, and even rocks and streams. The only places our waterways are really protected seem to be in protected forests. I know numerous elder citizens and see news reports of many preschool children who seem to be at the mercy of our polluted environment. Every little protected forest aids immensely in cleaning our part of the world.

Response

Oregon's constitution mandates that Common School Land (the majority of the lands managed by the Coos District) must be used to obtain the greatest benefit for the people of this state, consistent with the conservation of this resource under sound techniques of land management. This means using the land to benefit schools and maximize revenue to the Common School Fund over the long term. To accomplish these goals, the strategies in the draft plan are meant to produce dependable timber volume and revenues over the long term, while also providing resource protection for wildlife, fish, and other forest values.

Comment Number 76

So, let me just reiterate my strong support to keep the Elliott State Forest and all the creatures (endangered or surprises yet to come) safe and secure in roadless, non-logged forests.

I have been at the coast in August and noted just a general dry destruction of shore trees. The forces of nature are difficult enough without the Oregon Department of Forestry giving permission to log and to clearcut. We need to keep this forest as it is, without constantly changing rules due to the logging company pressures. The very air we all breathe is made from these trees! Protect our health with clean air, clean water, and healthy old growth forests.

Response

Oregon's constitution mandates that Common School Land (over 90% of the lands managed by the Coos District) must be used to obtain the greatest benefit for the people of this state, consistent with the conservation of this resource under sound techniques of land management. This means using the land to benefit schools and maximize revenue to the Common School Fund over the long term. To accomplish these goals, the strategies in the draft plan are meant to produce dependable timber volume and revenues over the long term, while also providing resource protection for wildlife, fish, and other forest values.

The state forest lands will be managed for structure, such as large trees, diverse native plants, abundant snags and down wood, and functional riparian and aquatic habitats. These habitat features will be developed throughout the forest, in early structure stands (clearcuts) as well as in more complex stands. The intent is to provide a diversity of conditions similar to those resulting from the natural disturbances that have occurred over time. The draft plan also includes conservation areas to protect habitat currently being used by threatened and endangered species, scenic and steep areas, administratively removed areas, and inner riparian zones.

A proposed habitat conservation plan will include more specific strategies for owls and murrelets to comply with the Endangered Species Act.

Elliott State Forest Management Plan Public Comments Responses: December 2005

Comment Number 78

I have traveled up and down this coast many, many times. I have seen devastation and complete annihilation of entire ecosystems and the watersheds they support due to clearcutting practices. I have seen hill sides give way due to clearcuts, watersheds ruined, soil runoff, and the clogging of streams making them impassable for salmon to make their runs into those watersheds. Sir, I beg you. Let us safeguard the remaining stands of old growth. Let us not cut down the very last of these giants. Let us be good shepherds to this land to the seventh generation, so my grandchildren and yours may enjoy seeing nature intact and able to support diverse ecosystems and the wildlife that accompanies a healthy forest.

Recently, this summer as I traveled North heading home from my vacation to visit family, I was startled to see substantial logging on both sides of the Pacific Coast Highway just south and north of Reedsport. Further up, as I crossed over at Florence heading East on Highway 26 I was again shocked to see this total annihilation of the forest on either side of the Highway, mile after mile, hillside after hillside, stripped bare. Sir, this is unconscionable. It is primitive and barbaric. I took a Natural Resources class at Humboldt State University when I was working on my BA back in the mid-eighties. At that time we had already taken out 90 percent of the redwoods in all out clearcutting. At that point they were trying to introduce selective cutting, but the large logging companies were opposed to this, and continued their policies of complete clearcuts as it is more profitable to them to clearcut the land and then re-plant with a monoculture of fast growing trees to replace what once was a diverse ecosystem.

But that does not make it right. I understand that there has been extreme pressure by the Federal Government to clearcut old growth on our national lands, especially after the Biscuit Fire several years ago down in Southwest Oregon in the Siskiyou. Now I have been made aware that the Elliot State Forest is in danger of also being logged and presumably clearcut. Please, Sir, I beg you, do not let this happen. This forest needs to be protected for all of us. It supports one of the most beautiful places on earth, an ecosystem that would take many generations, if ever, to be replaced. Please, do not let this land be massacred.

Response

Oregon's constitution mandates that Common School Land (over 90% of the lands managed by the Coos District) must be used to obtain the greatest benefit for the people of this state, consistent with the conservation of this resource under sound techniques of land management. This means using the land to benefit schools and maximize revenue to the Common School Fund over the long term. To accomplish these goals, the strategies in the draft plan are meant to produce dependable timber volume and revenues over the long term, while also providing resource protection for wildlife, fish, and other forest values.

The state forest lands will be managed for structure, such as large trees, diverse native plants, abundant snags and down wood, and functional riparian and aquatic habitats. These habitat features will be developed throughout the forest, in early structure stands (clearcuts) as well as in more complex stands. The intent is to provide a diversity of conditions similar to those resulting from the natural disturbances that have occurred over time. The draft plan also includes conservation areas to protect habitat currently being used by threatened and endangered species, scenic and steep areas, administratively removed areas, and inner riparian zones.

A proposed habitat conservation plan will include more specific strategies for owls and murrelets to comply with the Endangered Species Act.

Elliott State Forest Management Plan Public Comments Responses: December 2005

Comment Number 111

Though it might seem that a regrown clearcut might harbor endangered species, science has never proven that to be true. And the trees themselves are worthy of protection. Please do what you can to keep the valuable, endangered species habitat in Charlotte-Ludder basin, and elsewhere on the Elliott not to be degraded.

Response

NCASI has been looking at the question of how thinning practices affect habitat for northern spotted owls. This study is still in progress (ODF has been a participant in this study). Since it does take time for habitat to develop, with or without management, we have not yet had the opportunity to follow development of plantations which have been managed to achieve the characteristics of spotted owl habitat. However, Nierenberg and Tappeiner (2000) looked at the characteristics of spotted owl habitat on the Elliott and on state forest lands in the North Coast, and have proposed prescriptions to develop these characteristics in managed stands. Andrews et al (2005) also have proposed silvicultural approaches to developing spotted owl habitat from young plantations.

See the following:

Irwin, L. L., and D. F. Rock. 2002. Adaptive management monitoring of northern spotted owls: interim report and addendum to stud plan. Unpubl. Rept., National Council for Air and Stream Improvement.

Tappeiner, J., T. Nierenberg, J. Bailey, and N. Poage. 2000. Characterizing northern spotted owl habitat on state forest lands in the Oregon Coast Range. Appendix C in Glenn, E., R. Anthony, A. Ellingson, J. Tappeiner, T. Nierenberg. Summary of northern spotted owl research on Oregon Department of Forestry Lands in the Coast Range. Unpubl. Report, Oregon Cooperative Fish and Wildlife Research Unit, Corvallis, Oregon.

Andrews, L. S., J. P. Perkins, et al. (2005). "Silvicultural approaches to develop northern spotted owl nesting sites, Central Coast ranges, Oregon." *Western Journal of Applied Forestry* 20(1): 13-27.

Areas used by owls, murrelets and eagles - all listed species - were taken into account during the planning process.

Comment Number 118

Our old growth forests and state waterways are under siege. I request your support in strengthening our conservation laws to protect our state resources. The construction of logging roads should be halted and no more timber sales in native old growth forests.

Response

Oregon's constitution mandates that Common School Land (over 90% of the lands managed by the Coos District) must be used to obtain the greatest benefit for the people of this state, consistent with the conservation of this resource under sound techniques of land management. These Common School Lands were given to the state at the time of statehood in trust to benefit schools. The constitutional mandate (greatest benefit) has been interpreted by the Oregon Attorney General to mean that Common School Lands must be used to benefit schools and maximize revenue to the Common School Fund over the long term. To accomplish these goals, the strategies in the draft plan are meant to produce dependable timber volume and revenues over the long term, while also providing resource protection for wildlife, fish, and other forest values.

The state forest lands will be managed for structure, such as large trees, diverse native plants, abundant snags and down wood, and functional riparian and aquatic habitats. These habitat features will be developed throughout the forest, in early structure stands (clearcuts) as well as in more complex stands. The intent is to provide a diversity of conditions similar to those resulting from the natural disturbances that have occurred over time. The draft plan also includes conservation areas to protect habitat currently being used by threatened and endangered species, scenic and steep areas, administratively removed areas, and inner riparian zones.

Elliott State Forest Management Plan Public Comments Reponses:December 2005

Comment Number 135

I would like however to ask you to consider the need to protect our heritage, to give our children an opportunity to learn the value of preserving and taking care of what is God given. All too often adults complain about the destructiveness of this generation, about there lack of concern for property or taking care of their elders. But what example are the adults setting for them, teaching them that value and worth are measured by monetary value. I am asking you to take a moral and ethical stand to demonstrate to our youth that sometimes preservation and stewardship[are the mature and socially responsible way, that the needs of the many and future generations have precedent over the monetary needs of the few.

Response

Oregon's constitution mandates that Common School Land (over 90% of the lands managed by the Coos District) must be used to obtain the greatest benefit for the people of this state, consistent with the conservation of this resource under sound techniques of land management. This means using the land to benefit schools and maximize revenue to the Common School Fund over the long term. To accomplish these goals, the strategies in the draft plan are meant to produce dependable timber volume and revenues over the long term, while also providing resource protection for wildlife, fish, and other forest values. Within this context, the plan is designed to provide an appropriate balance of economic, social and enviromental values from the forest that will benefit all Oregonians into the future.

Elliott State Forest Management Plan Public Comments Reponses:December 2005

Sub-topic Short Rotations

Scope FMP

Comment Number 18

Why not harvest timber sooner?

Response

The draft plan does not specify a particular rotation age. The plan identifies three forest structure types and a forest-wide percentage range for each of those structure types. The strategy is to maintain a variety of stand types that emulate the natural range of variability and natural disturbance patterns. This strategy allows for flexibility in forest management and is designed to meet the mandate to maximize revenue over the long term, and to comply with the federal Endangered Species Act. The Department of State Lands Asset Management Plan calls for producing a sustainable, even-flow harvest of timber, subject to economic, environmental and regulatory considerations. A combination of clearcuts and thinnings of both smaller and larger trees will be used to produce a sustainable level of harvest.

Harvest modeling indicates that the draft strategies may be able to increase harvest volume over the 1995 plan while maintaining the desired range of stand conditions across the landscape.

Comment Number 41

Why not practice intensive management on the Elliott?

Response

It depends on what is meant by the term "intensive management". Stands on the Elliott will be actively managed and will use intensive management techniques to achieve the goals stated in the plan. One of the key goals is to meet the constitutional mandate to maximize revenue to the Common School Fund over the long-term, using sound techniques of land management. Another key goal is to comply with the federal ESA.

Elliott State Forest Management Plan Public Comments Responses: December 2005

Comment Number 177

The FMP describes when a young intermediate stand can be clearcut using very short-rotation forestry (similar to private land rotations), and when intermediate stands should be allowed to proceed to advanced structure. The FMP should be clearer about how these decisions will be made. For instance, the draft FMP says “Stands in the intermediate state... will be managed based upon its potential to meet the planning goals. Some of these stands will lack many of the essential components or have low potential to produce advanced structure” so they would be chosen for clearcutting. “Intermediate stands will have two potential pathways. The first path is to a clearcut harvest as intermediate structure.... Clearcut harvest will occur in the 40-50 year age range to maximize return.”

The FMP should make clear what criteria will be used to determine the stands on short rotation, and how many acres this involves.

The 1995 FMP EA says. “...harvest volume is maximized if harvest ages are set at the “culmination of mean annual increment,” or CMAI... CMAI for stands on the Elliott

State Forest ranges from approximately age 100 to age 150.”. Since the ODF is required to maximize harvest on the Elliott, short rotation should not be implemented.

The FMP is clear, in at least four places, that ODF cannot clearcut these young forests. In spite of this, the ODF has already been implementing the draft FMP by not doing any thinning in intermediate stands for the past three years. Instead, managed plantations are being clearcut. The new plans must not continue this, and revert back to maximizing harvest volume by eliminating short-rotations.

The ODF insists: “In order to maximize revenue, we have to consider short rotation forestry, and some stands will be harvested on short rotations” in the new FMP. Maximizing revenue with short rotations is only short-term. In the long term, revenue is lost by not maximizing harvest. Also, we could find no mandate to maximize revenue at the expense of wildlife and soil conditions. If the Elliott has been meeting their legal mandate for revenue since 1995, why are short rotations now necessary to increase revenue? The constitutional requirement for the Elliott State Forest is to maximize revenue, not net present value (NPV). No reason exists to shorten rotations. Consider the study by Robert Curtis that demonstrated the maximum tree growth for saw timber outputs is 80 to 120 years for high site Coast Range forest lands.

Response

Some younger stands will be clearcut harvested under the proposed plan for several reasons. In some cases stands may not be in a condition where thinning would allow for adequate stand growth and development. Starting over with a new fast-growing stand may be the best alternative. Another reason for harvesting younger stands is to reach a more regulated harvest within a particular basin. This will depend on the advanced structure target for the basin. Another reason is to produce revenue. Though maximum volume growth occurs later, shorter rotations will tend to maximize revenue because of the earlier recovery of investment.

Elliott State Forest Management Plan Public Comments Reponses:December 2005

Scope **IP**

Comment Number 178

The Implementation Plan says up to 850 acres will be clearcut annually for the next 10 years160, but it never tells us how many of this is 40 year old forests, and how many is 140 year old forests.

See comment #177.

Response

The detailed information regarding the age of stands to be cut , unit acreage, type of harvest, and location of 40 year old stands and any other harvest units, will be given in each of the annual operations plans within the 10 year period of the Implementation Plan.

Sub-topic Silviculture

Scope **FMP**

Comment Number 188

FMP page C-13: Silviculture will include "Rehabilitation of... serious plantation failure areas". Where are the serious plantation failures. How many are current, and how many have eventually recovered? Have the failed plantations been considered in the "sustainable" harvest calculations? How many acres are involved? What were the causes? Will moderate plantation failures be addressed along with serious plantation failures?

Response

Currently there are no stands on the forest that are in the "Rehabilitation" category. Areas where rehabilitation would most likely occur today are in areas where brush fields and grass areas resulted from fire or the conversion of agricultural lands to forests. Currently, most problems encountered during plantation establishment are identified and corrected a short time after the initial planting.

Elliott State Forest Management Plan Public Comments Reponses:December 2005

Sub-topic Structure Based Management

Scope FMP

Comment Number 104

As a forester, I applaud the multiple structured approach to stand management. I believe it will provide stand diversity for not only those species that desire a layered canopy and large trees, such as spotted owls and marbled murrelets, but also those that desire large openings to forage such as deer and elk. Your plan is dynamic and moves public forest management away from a "one size fits all" approach such as thinning or regeneration harvests as we see on many of our federal forests.

Response

Thank you.

Comment Number 113

Specifically, current models from OSU's John Sessions show that in 10 years the current FMP will produce about 21 mmbf a year, while the new propose FMP will produce 40 mmbf a year, almost double the logging. The new plans move the Elliott from age-based habitat definitions to structure-based habitat definitions. But, while the Tillamook and Clatsop forests have 5 structures defined, the Elliott has been simplified to use only 3: Early, Intermediate, and Advanced Structure.

Response

The forest is currently and will in the future be managed to produce a long-term sustainable level of timber harvest. The long-term sustainable harvest level for the Elliott State Forest has long been considered to be 50 million board feet (mmbf) annually. The Elliott is currently harvesting a little more than half that amount. Though there may be an increase in harvest under the proposed plan, the Elliott would still be growing significantly more every year than would be harvested. Modeling indicates that an annual harvest of 40 mmbf would result in an increase from the current 2.7 billion board feet of standing timber to about 3.5 billion board feet over the next 50 years.

We concur that three stand structure types are identified on the Elliott and five are identified on the Tillamook. However, the same developmental process takes place as stands transition through the stand types regardless of the number of stages that are identified.

Comment Number 189

Under the draft plans, the ODF can manage for the Desired future condition of early structure at 15%, intermediate at 45% and advanced structure at 40%. Are there any conditions where ODF will be required to manage for advanced structure above 40%?

Response

Under the FMP, advanced structure can be managed within a range of 40 to 60 percent forest-wide. The basin targets in the draft HCP currently add up to about 47% of the forest in advanced structure.

Elliott State Forest Management Plan Public Comments Responses: December 2005

Comment Number 202

The hypotheses posited by proponents of managing for structure based will take decades to validate. While there are many uncertainties, the one thing we do know for sure is that revenue will be lost in extending rotation ages and placing large tracts of productive timberland off limits to management.

Response

A key consideration in managing the Elliott is to comply with the federal Endangered Species Act. There are considerable numbers of federally listed northern spotted owls and marbled murrelets on the Elliott that have a significant effect on the management of the forest. When the spotted owl was listed in 1990, the Elliott's harvest was reduced from about 50 million board feet (mmbf) per year to less than 10 mmbf in some years in the early 1990s. At the time, it looked as though harvest would remain at that low level unless a new plan was developed. Subsequently, the 1995 Elliott Habitat Conservation Plan allowed the harvest to increase to about 27 mmbf per year. Modeling indicates that the proposed plan can significantly increase harvest levels to perhaps 40mmbf while still complying with the federal ESA. Before the proposed HCP is approved, the State Land Board and Board of Forestry will make a business decision on how well the new plan meets their fiduciary responsibilities.

Scope **HCP**

Comment Number 218

The relationship between the proposed distribution of structural stages and watershed conditions requires clarification

The Plan emphasizes that 85-95 percent of the forest will be in intermediate and advanced structures at any point in time. This fact provides little assurance that aquatic habitats will be adequately protected and, and sounds better than it actually is. What percent will be in intermediate versus mature? How much is truly in an old growth condition? What limitations on early seral in a particular subwatershed will apply? How does this relate to meaningful metrics of watershed condition such as hydrologic maturity or equivalent clearcut area? What limitations on soil disturbance will be applied?

After 50 years, in watershed with large amounts of advanced structure forests, there will be significantly less than there is now. (E.g. the Charlotte watershed) It is unclear how clearcutting mature forests in the most intact areas – those areas serving as habitat refugia -- will maintain or improve watershed conditions.

Response

These types of HCP effects will be analyzed in the EIS process.

Elliott State Forest Management Plan Public Comments Reponses:December 2005

Sub-topic Thin no clearcuts

Scope FMP

Comment Number 27

The Elliott State Forest needs protection at this time. The Elliott can benefit school children by commercially thinning plantations and by providing educational recreation.

Response

A partial cutting only approach as suggested would not meet the constitutional mandate to maximize revenue to the Common School Fund over the long-term. Since thinning is relatively expensive and the volume per acre low, the revenue generated from a thinning-only approach would be a fraction of that currently produced under the 1995 plan. Thinning can and is used periodically to attain certain objectives for stand structure and to produce some revenue. But because Douglas-fir is a shade intolerant species, even-age management is the most efficient and productive method for managing coastal Douglas-fir forests.

Comment Number 34

Why create more early structure when there is so much already?

Response

The mandate for Common School Lands is to maximize revenue to the Common School Fund over the long term, consistent with sound techniques of land management. The plan identifies a range of different structure types to be maintained on the landscape over time that encompasses the historical range of stand types in the Oregon Coast Range. The range for early structure on the forest is 5-15 percent.

Comment Number 120

I know that the Elliott SF (92-odd thousand acres located just east of Reedsport Oregon and west of Loon Lake, in the Umpqua and Coos River watersheds) can benefit school children by commercially thinning plantations and by providing educational recreation.

Response

Thinning plantations can produce some revenue, but thinning of plantations alone would produce only a fraction of the revenue currently produced on the forest and would not meet the constitutional mandate to maximize revenue to the Common School Fund.