

Oregon Department of Forestry
State Forests Program
NW Oregon Area

State Forest Advisory Committee
Review of the Fiscal Year 2008 Annual Operations Plans
Committee Comments and the State Forest Program's Responses

June 29th, 2007

List of Acronyms and Abbreviations Used

AD - Area Director
AOP(s) - Annual Operation Plan(s)
BMP - Best Management Practices
BOF - Board of Forestry
DF - District Forester
DFC - Desired future condition
ESA - Endangered Species Act
FMP - Forest management plan
FPA - Forest Practices Act
GIS - Geographic information system
HCP - Habitat conservation plan
H&H - Harvest and Habitat Model
IP - Implementation plan
LWD - Large woody debris
MBF - Thousand board feet
MMBF - Million board feet
NSO - Northern Spotted Owl
NWOA - Northwest Oregon Area
OAR - Oregon Administrative Rules
ODF - Oregon Dept. of Forestry
ODFW - Oregon Dept. of Fish and Wildlife
ORS - Oregon Revised Statutes
PD - Program Director (for the State Forests Program)
RMA - Riparian management area
SF - State Forester
SFAC - State Forest Advisory Committee
SAH - Salmon Anchor Habitat
TA - Take Avoidance (Northern Spotted Owl conservation measure)
T&E - Threatened and endangered
USFWS - U.S. Fish and Wildlife Service

Introduction

The following are excerpts taken directly from the meeting minutes and notes of the April 13th meeting with the State Forest Advisory Committee (SFAC), when they provided feedback and comment of their review of the FY 08 Annual Operation Plans (AOPs). Many of the comments were generated during group breakout sessions however, there are others that were provided by specific individuals during roundtable discussions. The latter are denoted by using the first name of the committee member that provided the comment. The comments as they appear here are in bullet statements and were derived from the transcript recordings and the group notes. All of them were verbally expressed with the exception of a written letter that pertained to FY 07, which was given to the Northwest Oregon Area Director (NWOA AD) last year by a committee member who expressed that the same letter and comments apply again to the 08 AOP review.

The comments are categorized into those that were more general in nature and those which were more specific, or that pertained to an individual operation or District. Many were positive kudos, and have been listed separately from the constructive feedback that solicited a response from the Program. Also included are duplicate comments, to provide some idea of how frequent similar comments were made.

The responses to the programmatic-level comments are addressed in paragraph form and intend to respond to the topical categories collectively. Since some of the original individual comments could pertain to several topics, responses are generally only addressed under a single category.

1.0 Programmatic-level Comments

1.1 Positive Feedback

1.1.1 Comments about Annual Operations Plans

- There was a general sense in this group that the AOP's are at appropriate harvest levels.
- There was satisfaction expressed that the levels are lower than they have been in the last couple of years and that the volume is higher on fewer acres with an increase in revenue.
- The group reiterated that they felt the harvest levels were appropriate.
- This group commends the department on its active silvicultural investments.
- The group felt all three elements of GPV are being provided.
- Timber harvest objectives are considered to be a tool to move toward DFC.
- Dave B. expressed that the current process is following the FMP well.
- Nancy S. indicated that she is comfortable with harvest levels, and is pleased to see that monitoring and research is going on. She hopes the department is responsive to research findings and uses new data in reviewing the success of the FMP.

- Phil C. is continuously impressed with the competence and willingness of the staff to present this information. He feels the public is, in general largely unaware of ODF's hard work and ability.
- Wayne N. is impressed with the effort ODF gives to illustrate what they are doing.
- Rex S. feels that ODF does a great job with the current plans.
- Vergie R. thanked the staff for the amazing amount of work they do and their willingness to help members understand the plans.

1.1.2 Comments about Recreation

- There were positive comments regarding the plan for construction of motorized and non-motorized trails.
- There is some progress in recreation, although slow, the department has made good strides.
- Barrett B. feels the ODF recreation program is a spectacular program and envied by other land managers. ODF is doing what it can with available resources.

1.1.3 Comments about Roads

- There were also positive comments regarding proposed road construction, keeping new construction limited as much as possible to small spur roads and maintaining the current road system.
- There was some discussion about culvert replacement, and some members commended the department on striving to replace those which needed replaced.
- There was positive feedback on the investment in the road system.

1.1.4 Comments about Wildlife and Watersheds

- There was positive feedback regarding Marbled Murrelet Management Areas and that the FY 08 AOP addressed them well.
- Positive comments were received regarding SAH strategies.
- There was positive feedback regarding stream restoration projects.

1.2 Constructive Feedback

1.2.1 Comments about Annual Operations Plans

- There was a comment that it was difficult to determine from the AOP's whether the department was meeting the goals of the different values based on the proposed operations.
- It was suggested that consistency be outlined better between the FMP, IP's and AOP's.
- There was a request that the plans better outline how the operations are helping to achieve social, economic and environmental values.

- There was a comment that ODF are good stewards and that they should outline in the plans, what they are doing environmentally that exceeds the minimum legal requirements.
- There was a feeling that the emphasis in the plans was leaning more toward economic values and that the plans could better outline how they are addressing social and environmental values as well.
- Klaus P. would like to see past accomplishments noted in AOP's. The level of detail in the summaries varied by district and he would like to see more consistency.
- Nancy W. would also like to see past accomplishments noted in the AOP's. She feels layering maps from past AOP's would give her a better understanding of the areas being affected by management activities.
- Phil C. said he would like to see a mid-term predictive in the 5-20 year range included in the AOP's. These cumulative trends and predictions could be analyzed more frequently and reported in the AOP's.
- April O. likes the summary document but would also like to see better cumulative evaluation and trend information presented in the AOP's.
- Rex S. also expressed that ODF's Take Avoidance (TA) strategies are too restrictive and need to be revised so they are less limiting.

The Program's Response to Comments about Annual Operations Plans

In response to past years' operational plans including FY 08, the committee members have expressed that it would be useful if the AOPs contained some measure of accomplishment so that they could better evaluate the contribution of any year's proposed activities toward achieving FMP goals and IP objectives. Such indicators would be useful to them for evaluating how well an AOP contributes to those goals and objectives and their related economic, environmental, and social values.

To-date, the AOPs have not been the primary vehicle for disclosing accomplishments, though there is some reporting provided in several tables in the summary documents. For example, in the main body of the individual District summaries Table 1 compares the planned harvest with the Implementation Plan (IP) objectives, and Table 3 provides a cumulative account of the acres harvested within each planning basin since the FMP was adopted. There is also a summary table in the appendices which provides a cumulative account of the harvested acres to-date in SAH basins in relation to harvest acreage limits established by their respective plans. Similar tables are also presented in the Area-wide summary that has been compiled and presented to the SFAC for the past several years to help facilitate their review of the AOPs. These tables have been incorporated into the various AOP summaries in part as a response to advice from SFAC regarding potential improvements to the AOP documents.

One factor that affects the committee's ability to clearly distinguish the degree of contribution of the AOPs to the attainment of goals and objectives is related to timing. In the State Forest Program, accomplishment reporting has been a process that typically is

separate from the AOP review period. There is no synchronized process of accomplishment reporting and public review period of the AOPs. For the SFAC, accomplishment reporting has been in recent years a topic on the fall or winter meeting agenda. The AOPs however, are reviewed in the spring, after the accomplishments of the prior year's operations have been reported. Since both of these functions of the Program occur at different times during the fiscal year, clear comparison for AOP review has not been optimally facilitated for the SFAC.

Within the State Forest Program approaches for enhancing the ability of SFAC to evaluate an AOP's contribution to FMP goals and IP objectives is being discussed. For AOP review, the Area-wide summary could include several additional tables or charts that tally key annual accomplishments and to-date summations by District that could easily be compared to a current year's AOP. This would provide context for comparison with previous years, which in turn could provide for at least a means for judging qualitatively and intuitively how well an AOP is contributing to the attainment of goals and objectives.

Another approach that is being created by the Program which SFAC has reviewed includes the recently developed Performance Measures. An ongoing effort, these are intended for various stakeholders and the Program to be indicators of how well the FMP is being implemented. Currently, these are under review by the State Forester and the Board of Forestry, and with their collaboration the Program's leadership is expected to continue developing and refining the utility of the performance measures.

These improvements should better facilitate SFAC's review and enhance the consistency of the AOPs, even though each of the unique Districts brings some inherent differences between individual plans, operations, and priorities. And they should help identify how the Program's operations are intended to better meet and enhance all of the goals and objectives related to the economic, environmental, and social values stated in the FMP.

1.2.2 Comments about the Desired Future Condition (DFC)

- A question came up related to the H&H model and if there was a determination from the findings on when the department would reach DFC.
- There was some concern that the department is not moving toward DFC quickly enough since both partial cut and clear-cut harvests are below the mid-point of the IP ranges.
- There was a comment that some members are not sure the department is moving toward DFC and including measures of progress in the plans would be helpful to assist members in evaluating success or failure in this area.
- There was some concern that there are stands that are underperforming in terms of growth and a greater pace would move toward DFC more quickly.
- There was a feeling that the department is moving toward DFC but slowly.
- There was a request that the summary documents contain more information on the current conditions and the connection of proposed operations to achievement of DFC.

- Vergie R. would also like to see trending information toward DFC included in the AOPs.

The Program's Response to Comments about the Desired Future Condition

The FMP does not specify how fast DFC is supposed to be achieved. Using the Harvest and Habitat model (H&H), the Program has conducted growth and yield simulations that estimate that the DFC (i.e., 50 percent complex structure across the landscape) could be achieved as early as 80 years from now on some of the NWOA Districts. A variety of factors however, such as stand conditions, conservation requirements, the rate of timber harvest, landscape design, and deviations from an even, sustainable flow of harvest can affect how soon structure goals could be achieved. To the individual Districts attainment of DFC is a long-term goal. But they have to balance the long-term goal with short-term objectives too, such as annual timber harvest. Under the FMP as it is currently being implemented, it is estimated using the H&H model that the development of complex structure across 50 percent of the landscape could potentially be achieved in 80-100 years from now.

Currently, the AOPs contain in their summaries a table that attempts to convey how proposed operations will develop or convert forest stands, via timber harvest, from one structural stage to another. These tables however, display only the planning year, and are not intended to provide a long-term tracking mechanism useful for charting progress towards DFC attainment, or to compare the contribution of a particular AOP to achieving structure goals. Such trend information is typically conveyed in accomplishment reports in the winter.

Since growth and development of stands from one structural stage to another takes decades, and varies depending on age and conditions, the annual contribution to stand development is incremental. And to determine what structural stage a stand is in requires inventory and sampling, which at a landscape-scale is a very time consuming process that takes years. So it's not very intuitive to depict the spatial and temporal context in a table. It may be however, that the Program could provide a cumulative tally of harvested stands in our landscape design mapped as DFC complex, and their post-harvest structural stage. This could provide reviewers with a comparison to previous years, and depict the total proportion of the mapped DFC complex that has been treated to-date. Such a table could be included in the Area-wide summary and may help reviewers with an indication of progress and annual contribution. A sample version of such data could be compiled to see if the committee thinks such a table would be beneficial to their annual review of operation plans.

1.2.3 Comments about Harvest Levels

- Another concern was expressed that the harvest reduction comes at a time when the counties desire more revenue and timber flow.
- It was also noted that a slower pace of harvest can negatively impact habitat and socio-economic values in local communities.

- Another view was presented that the current levels of harvest are within the IP ranges and are not in violation of the plan.
- There was some question on whether blow-down should be added to the AOPs or whether it should be treated separately.
- Dave B. suggested that the department look at thinning prescriptions and volume outputs and scrutinize whether it is maximizing growth.
- Dave B. would like to see less restrictive management of state forestland through re-evaluation of DFC, SBM, and T&E strategies.
- Rex S. disagreed with the current AOPs being below the mid-point of the acres range.
- Rex S. feels that the opportunities to address catastrophic blow-down or wildfire should be additional volume and not a replacement of planned operations in the AOPs.
- Rex S. feels that there are opportunities to improve the economic performance of the FMP.

The Program's Response to Comments about Harvest Levels

One of the overall goals of the NW FMP is to provide a sustainable flow of timber harvest using prudent and careful management in an environmentally sound manner. The harvest objectives are directed for each District annually by the State Forester (SF) based on recommendations by the Program Director (PD), the Area Directors (ADs), and the District Foresters (DFs), who make informed decisions based upon comprehensive analysis using the H&H model and local professional judgment by their field foresters. The Board of Forestry (BOF) also weighs in with policy-level recommendations which the State Forester takes into careful consideration. In an effort to implement adaptive management, analysis of timber harvest objectives is conducted as necessary so that the Program can adjust within a defined range to fluctuating economic, environmental, and social goals.

For the FY08 AOPs, the SF directed that the harvest objective would be the same as the 2006 and 2007 objectives, which stated that Districts were to plan for the midpoint of their IP acreage and volume objectives. Additionally it was directed that the Districts include a set of alternate sales that would provide for flexibility should the SF request the Districts to increase their planned outputs and generate volume at the high-end of the range of their respective IP objectives in the event that economic goals needed to be enhanced.

Upon careful analysis, several of the Districts determined that they would need to modify their targets and that their planned outputs would be somewhat different than years previous. In response, the SF took into account the analysis and issued adjusted guidance that provided volume targets for each of the individual Districts in the NWOA for FY 08.

The most significant modification was made by the North Cascade District, which due to T&E conservation limitations, and the extent of previously thinned stands had to reduce their annual volume target by about 6 million board feet (MMBF) below the midpoint of

the range of their IP objective, which decreased their planned output below the stated low end of their IP range. To do so they decreased their amount of planned partial cut acres below the range of their IP objective. In an effort to offset some of the effect upon their volume output, yet continue to provide a sustainable flow of timber from their District, they were able to increase their clearcut acres above the range of their IP objective. This was made possible because they have a pool of unencumbered thinned stands that are ready for final removal.

The Astoria and West Oregon Districts changed their mix of acres too, but they were able to plan enough volume to remain within the range of their respective IP objectives. By comparison, the Western Lane District has planned to increase their harvest by about 3.5 million MMBF more than the midpoint of their IP range, which is about 1MMBF greater than the high-end of their range.

Both the Astoria and the Forest Grove Districts were able to plan enough volume to exceed the mid point of the range of their respective IP objectives by approximately 6MMBF each (12 MMBF combined). The Tillamook District's planned FY 08 volume is about 4 MMBF below the midpoint of the range of their IP, while the West Oregon District plans to harvest slightly more than their midpoint.

Despite all of the modifications, the combined amount of volume planned across the entire NWOA amounts to an estimated total volume of 222 MMBF on approximately 12,485 acres, which would generate an estimated net of \$58,792,994. The planned volume for FY 08 is about 6MMBF above the midpoint of the combined range of all of the District's IPs. It is about a 15 MMBF increase over the FY07 planned harvest level. The FY08 AOPs represent an annual contribution of timber harvest that due to careful analysis takes into account adjustments due to local conditions, responds to fluctuating economic considerations, meets the goals and strategies of the FMP, and remains sustainable.

At this time, inclusion of salvage volume resulting from blowdown (or some other disturbance such as fire, insects, or disease) is directed to *not* be additive to planned timber harvest in an AOP. The rationale as directed is due to the fact that much of potentially salvageable volume comes from current standing volume – or crop trees considered part of the inventory. Hence, the volume has been included in the analysis and determination of the estimated supply of sustainable harvest that can be maintained. To add salvage volume to an annual harvest objective translates into harvest above the calculated sustainable supply.

As part of the analyses to determine what is sustainable, analysts as well as the field foresters conduct various individual calculations to scrutinize whether or not growth is being maximized by thinning (partial cutting). But the FMP directs that a variety of non-timber related goals and objectives be achieved. These “non-tangibles” enter into the question of whether to clearcut or partial cut. Forested stands that are designated for timber production as the primary objective, local field foresters take into consideration whether clearcutting or thinning will be the best option for the present and the future. To

do so, stand-level inventory and cruise information is collected and used to decide if multiple entries that generate intermediate volume several times prior to a final removal of large, high value trees with high quality wood is better compared to the development of a highly dense stand of many smaller stemmed trees that could be grown and clearcut several times over the same timeframe.

The FMP and the many goals and strategies it directs, is not considered to be an industrial model, and due to its many objectives is perceived by some stakeholders to encumber a higher level of economic output. As such, the FMP is consistently being scrutinized by the BOF and various constituents to evaluate whether or not it is the best way to meet the Greatest Permanent Value (GPV) as is stated by ORS 530. These high-level appraisals and assessments are complex and ongoing and may take a significant amount of effort and time. Meanwhile, the Program is directed to continue operations and plans annually for timber harvest. The Districts and local field foresters are charged with planning these tasks, and only contribute to high-level decision-making when called upon to provide input and information. Thus, the AOPs reflect their ongoing responsibilities to achieve their goals and objectives. Only upon modification of high-level policy decisions will direction be provided to the field units that would be reflected in their AOPs.

1.2.4 Comments about Silvicultural Prescriptions

- Some felt there were opportunities in stands of red alder to plant shade resistant species such as Western Red Cedar.
- It was also suggested that investing in low quality stands can benefit a range of interests.

The Program's Response to Comments about Silvicultural Prescriptions

Stand-level decisions regarding silvicultural prescriptions take many factors into account; particularly current stand conditions and dynamics, annual and long-term objectives, and economics. Underplanting is a practice that is usually prescribed as a part of a harvest prescription in which growing space is created so that a second cohort can be established, resulting eventually in greater stand complexity. Underplanting however, without creating growing space is not considered to have a high potential for success. Even though western red cedar is a shade-tolerant species, without growing space it will grow very slowly if under a closed canopy, even a deciduous one. Additionally, cedar is very palatable to elk, so it would have to be protected if expected to have a chance to mature. Combined, these factors equate to a low success potential for the cost that would have to be incurred if such an undertaking were to be pursued at a stand-level scale. On a smaller scale such as a micro-site however, underplanting using cedar is sometimes practiced as an element of an aquatic or riparian restoration project. In multi-acre patches of alder, underplanting with cedar is only considered a viable option with some form of harvest that would open the canopy and create growing space. These types of prescriptions are employed most commonly on the Tillamook District where significant, large patches of red alder are prevalent.

Forested stands considered to be low value are typically those that are slow growing, or that exhibit low volume per acre, or those that are dominated by non-merchantable or low value species. If certain conditions warrant, such as there is easy access, there are compelling objectives, and the potential for success is considered to be worth the investment of time and money, there are instances when treatment is prescribed. Within the Tillamook burn for example, there are many acres of young Douglas-fir stands infected with Swiss-Needle Caste that exhibit poor growth rates where harvest treatments are frequently being practiced to stimulate productivity.

It is acknowledged that many acres exist in the burn where low value stands could benefit from treatment. But access remains a problem, and the near-term cost of providing it would be exorbitant. Efforts are under way however, to prepare access and transportation plans that will eventually provide an opportunity to enter many of the low-value stands in the burn. For now the effort is slow to proceed. Not all stakeholders view the cost or the road construction as a favorable pursuit. Nonetheless, access and travel management on the Tillamook District remains a primary concern and improvements are a long-term objective.

1.2.5 Comments about Threatened and Endangered (T&E) Species

- There was some concern over the more restrictive take avoidance strategies of the department compared with that of the timber industry.
- It was recognized that Watershed Assessments are good tools and districts should reference when and how they are used in the plans.

The Program's Response to Comments about T&E Species

The Program is currently looking at possible ways to alleviate some of the T&E encumbrance while still maintaining compliance with the FMP and the Strum Creek agreement with the USFWS regarding the ESA. The conservation requirements for the NSO on State Forest lands are different than for private lands where FPA policies apply. This is due in part to the goal in the FMP (an OAR) which states that the requirements of the federal and state endangered species acts will be met. The origin of the goal is related in part to the tie of the FMP to the GPV rule which states that habitat for native wildlife will be protected, maintained, and enhanced. In short, the Program is directed to not only maintain existing habitat, but also to develop *new* habitat for the future. The landscape strategies in the FMP identify the primary means by which we are to employ those strategies in the long-term. Under section 10 of the ESA private landowners are not required to develop new habitat for the future, and it does not require them to contribute to the recovery of listed species, only to avoid harm and harassment of existing nest sites occupied by an owl pair. Basically, private landowners are only required to provide short-term protection measures, compared to State Forest lands which are directed to apply both short- and long-term conservation measures.

Watershed Assessment is an ongoing and active element of management on State Forest lands. Upon completion of an assessment, a District prepares an internal document known as a watershed action plan. These plans are comprised of the recommendations and potential opportunities that are identified in an assessment. The action plans are then

used as a tool for identifying activities that may be individual projects, or an element of a larger project proposed as part of an AOP. To-date the individual pre-operations plans may identify a project that originated from a watershed assessment, but they typically do not state the connection with a watershed action plan. Specificity and reference however, could be improved in the District and Area-wide AOP summaries that better describes proposed activities related to watershed assessments.

1.2.6 Comments about Recreation

- There was some dissatisfaction with the speed at which construction of motorized and non-motorized trails is being developed.
- Reiterated the need for additional staff to manage the recreation facilities and planning.
- It was reiterated that recreation progress is moving too slowly.
- There was a concern that recreation objectives are not being met.
- There was a request that sustainability be an area of focus when engineering and designing trails.
- It was also noted by this group that there is an urgent need for agency resources to be applied to recreation management.
- There was a comment that poorly designed recreational areas lead to environmental disaster.
- There was acknowledgement by this group that there is a lack of position authority in recreation to meet the needs of public demand.
- Barrett B. feels that the motorized trail system could be better engineered and located.

The Program's Response to Comments about Recreation

The Program has long recognized that public demand to accommodate a higher degree of recreational use is growing faster than we are able to expand. An independent 2nd-part assessment of the recreation program on State Forest lands was recently completed. It identified many of the same findings as the committee's concerns. The study has put into effect a concerted strategic effort to address the many issues. In the interim however, the recreation program has been directed to maintain and hold at the present level of ability and capacity. At this point the Program is unable to expand and develop further due in part to limited resources internally. It is anticipated that the SFAC will play an important role as the Program begins development of a strategic plan for recreation management on State Forest lands.

1.2.7 Comments about Watersheds, and Invasive Species

- There was a request that the districts look at adjacency of prior disturbances in sub-basins.
- Carolyn E. would like to see the total acres of basin in a summary chart re: harvest by basin.

- There was some concern that the department may not be paying enough attention to invasive species.
- Some members felt that silvicultural objectives should include addressing invasive species challenges.
- Mark M. re-iterated that his comments regarding additional and in-depth reporting of proposed operations to meet SAH's objectives apply to the 08 AOP too.

The Program's Response to Comments about Watersheds, and Invasive Species

The cumulative effect of project-level activities and timber harvest by management basin is not routinely evaluated as a part of the AOP process. The aquatic, riparian, and landscape strategies in the FMP are considered adequate to provide protection against undesirable impacts to a watershed as a result of cumulative actions. Cumulative operations by management basin are *reported* however, as a part of the AOP in Table 3 of the District summary document. An exception applies to basins designated as Salmon Anchor Habitat (SAH). An assessment of the cumulative tally of harvest operations is conducted for the purpose of insuring compliance with the 2003 SAH Strategy as a part of the AOP process. Per basin evaluations are also conducted as an element of the watershed assessment program. Additionally, cumulative disturbance and adjacency may be assessed internally by ODF specialists during the AOP planning process if an operation is proposed within a portion of an NSO circle (either in the designated home range or the core habitat), but to address wildlife related issues not watershed concerns.

In Table 3 of the individual summary documents, the percent of the total basin area could be included with relative ease to provide a better frame of reference and context.

Since they were adopted, reporting and screening for SAH related concerns has become a part of the AOP process over the years. And many of the elements of the SAH strategy are considerations that are routinely addressed during operational planning. There are projects that are proposed and implemented that contribute to the SAH strategies, particularly in-stream placement of LWD during certain harvest operations, individual in-stream projects such as culvert replacement, and ongoing road improvement and maintenance. Yet, these activities have not been typically identified nor reported as projects intended to respond directly to a specific SAH strategy. Identifying activities proposed in an AOP as a contributing effort to achieving SAH strategies could be better articulated. The Area-wide summary would be ideal for disclosing to the public operational plans that promote properly functioning aquatic and riparian conditions, which could tie nicely to the watershed assessment process and the watershed action plans.

Additionally, there are regularly planned operations that result in RMA treatments via thinning in which the Program is not recognized as actively managing for the development of complex forest structure. Nearly all of the partial cutting that occurs includes at the minimum, treatment of the outer zone of an RMA, and often times the inner zone too. Individual prescriptions in some cases differ between these zones and the

non-RMA portion of a harvest unit. It is noteworthy that in particular, thinning in stands with a DFC of complex, RMAs are being treated to promote and hasten the development of older forest structure, which ties directly to several SAH strategies. Disclosing these treatments during the AOP process would better illustrate the Program's operational contribution to the Oregon Plan for Salmon and the conservation of aquatic and riparian habitats.

Invasive species issues have been gaining heightened attention of late within the Program. Over this past year a group of specialists has been assembled to develop guidance for addressing invasive species on State Forest lands. Currently, they are amidst the preparation of invasive species plans for each of the Districts in the NWOA. At present, operations intended to specifically deal with eradication are not an element of the AOPs. Typically eradication efforts are conducted on a small scale, case-by-case basis, or during site preparation activities that facilitate reforestation. It is anticipated that project-level activities however, could become a part of the AOP process in the future as concerns intensify.

2.0 District-level Comments

2.1 Positive Feedback

2.1.1 Comments on Astoria's AOP

- There were a lot of positive comments on stream surveys and fish assessments, especially in Astoria.
- There was also positive response to the speed at which Astoria district is moving from understory to layered conditions.

2.1.2 Comments on Forest Grove's AOP

- There was positive feedback regarding the connection of the Wilson River Trail and that the Forest Grove district plans to complete three and a half miles of non-motorized trail.

2.1.3 Comments on West Oregon's AOP

- There was a general feeling that there was a better attempt to diversify vegetation in the West Oregon district.

2.2 Constructive Feedback

2.2.1 Comments on Astoria's AOP

- There was initial apprehension regarding the Astoria district's increase in clear-cut acres and decrease in partial-cut acres. The district staff provided clarification regarding the issues pertaining to owl conservation measures (circles) and the extent of previous thinning, and the group acknowledged and understood the rationale.
- Carolyn E. requested that the Program better research the impacts of increased acres of clear-cuts in Astoria on water quality and landslide hazards.

- Carolyn E. mentioned that efforts had been made to strive toward the goal of maintaining hardwoods in the Astoria district at 10% or less. One member felt that there was too little.
- Carolyn E. expressed that a 300 foot buffer between clear-cuts in the Foster Home operation on the Astoria District was not adequate even if it meets the regulatory requirements.
- Carolyn E. expressed concern regarding the change in the proportion of clear-cut and partial cut acres on the Astoria District. Concern about the public relations aspect of this change.
- Carolyn E. expressed concern about possible effects of the increase in clear-cut acres on stream sediment and landslide potential.

Astoria District Forester Response

Thank you for your review of the Astoria District's 2008 AOP. All SFAC comments have been thoroughly reviewed and thoughtfully considered in an effort to make sure that this AOP complies with the Northwest Forest Management Plan and the Astoria District Implementation Plan.

A comment was made by SFAC indicating "initial apprehension" regarding the increase in clearcut acres and decrease in partial cut acres in the AOP. The reasons for this shift in harvest type include: 1) Based on the current condition of the Clatsop State Forest when the Northwest Forest Management Plan was adopted (primarily CSC and UDS stands), it was necessary to aggressively thin stands in order to develop the varied structure goals in the Astoria District Implementation Plan (IP); 2) Continuing partial cutting at this high rate would not be conducive to balancing the desired future stand structures across the district; and 3) The Harvest and Habitat model yielded results suggesting reduced partial cut and increased regeneration harvest would be a viable harvest plan while still meeting all the goals and objectives of the NWFMP.

One request was made to better research the impacts of increased clearcuts on water quality and landslide hazard. This AOP meets the Northwest Forest Management Plan Aquatic and Riparian Strategies and has been reviewed by Department Geotechnical Specialists for landslide hazard risk. The department does have a monitoring program which performs on going research and monitoring on various management activities. Currently there is a watershed study going on in the Trask Basin by a cooperative OSU, BLM, and ODF group, pertaining to watershed studies and management effects.

Foster Home is a sale within this AOP that had a specific comment regarding the 300 foot buffer between Areas 2 and 3. The commenter felt, 300 ft. while meeting the Forest Practice's Act was not adequate. It is worthy to note that at the pre-operations report stage, field work has not yet been done to verify exact placement of the boundary. The 300 ft. buffer mapped in the pre-operations report was placed as a visual minimum buffer during this initial planning stage. Currently, field work has started on the Foster Home sale. After field reconnaissance was done on Areas 1 and 2, the south boundary of Area 2 and the north boundary of Area 3 was modified to better align with topography and to

accommodate for harvest setting breaks and riparian buffers. A 300 to 500 foot buffer now separates Areas 2 and 3 of Foster Home. The final version of the Foster Home pre-operations report with maps will be posted online for viewing July 1, 2007.

2.2.2 Comments on Forest Grove's AOP

- Regarding the Round Rice Sale, there was a request for better information regarding trail closures in the proximity of this sale.

Forest Grove District Forester Response

There are no trail closures planned with the Round Rice sale. The nearest trail is located two-thirds of a mile to the northwest of the timber sale. Harvest activities will not impact the use of this trail.

2.2.3 Comments on Tillamook's AOP

- Some disappointment was expressed that there was not enough planned for the Tillamook district in regards to recreation.
- Regarding silvicultural investments, a representative from the Oregon Hunter's Association, expressed concern that the spraying levels are too high in the Tillamook District and felt this would have a negative impact on large game and its habitat.
- In regards to timber harvest objectives, it was expressed by some members that Tillamook could be doing more with underproductive stands to increase the pace toward DFC.
- Rex S. stated that the Tillamook district has an opportunity to more aggressively manage the low value stands.

Tillamook District Forester Response

The State Forests Program is currently assessing its recreation program in the NW Area. Part of that assessment will be to determine the size and scope of the recreation program the agency will provide including staffing levels necessary to develop and sustain the program. Current staffing levels may be adequate to maintain existing recreation facilities however, there is insufficient staff to develop more and then provide adequate maintenance.

In regards to herbicide applications, ODF is meeting with representatives from Oregon Hunter's Association to discuss their concerns about spraying levels on the Tillamook District.

In regards to timber harvest objectives, it was expressed by some members that Tillamook could be doing more with underproductive stands to increase the pace toward DFC and that there is an opportunity to manage them more aggressively. Access costs for many of the underproductive stands are high because of the amount of road construction and road improvement required. These stands are low value because of low volume per acre and low quality timber. The result is that the timber value on these stands may not be adequate to pay for the access costs. Through our Transportation Planning process however, underproductive stands will be identified and an access plan will be developed that will provide access first to areas where the opportunities are the greatest, making the

long-term investment more worth while. It should be noted that some stakeholders would prefer we do not build more roads, while others view the cost to great for the return on the investment. The District is taking into account these factors in its transportation planning.