
From: Joe R
Sent: Tuesday, March 20, 2007 1:35 PM
To: WELTY Roger
Subject: ODF Forest Plan

Sir:

As Mid West Director, Oregon Hunters Association I am very concerned with the situation of lack of habitat for all wildlife with the reduction in logging on public land. I am particularly concerned about the lack of early seral landscapes for large game animals such as deer and elk.

While there are only about 16 species that are total depended on old growth there are about 71 species that depend on early seral landscapes with about 116 species that are generalists and utilize all landscape types. This brings me to the point that public land needs to be managed for all species with a balanced mix of forest types. In addition when early seral landscapes are created they need to be managed to support big game and other species that are depended on this type landscape. This management needs to take into consideration the habitat requirements for the short period (about 20) where this early seral landscape is available after logging or some other activity like fire.

In additional to the above comments I want to stress the importance that the Oregon Department of Forestry plans and those of Oregon Department of Fish and Wildlife are coordinated so that so plans are supportive of each other.

These comments are my own and do not reflect the official position of Oregon Hunters Association.

Joe R.



Oregon

Theodore R. Kulongoski, Governor

Department of Forestry

State Forester's Office

2600 State Street

Salem, OR 97310

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July 12, 2007



"STEWARDSHIP IN FORESTRY"

Dear Joe R

Thank you for your comments on our 2008 annual plans. Oregon's State Forests are managed to provide a broad range of environmental, social, and economic values to the people of Oregon, including large game habitat. Under the Northwest Oregon State Forests Management Plan (NWFMP), that covers the area from Eugene to the Columbia River that is west of the Cascades, State Forests are managed to develop and maintain a range of stand structures for the habitat needs of native wildlife, including 5 to 15 percent of the land base in a "Regeneration" stand structure. This structural stage is one of the four stand types addressed in the Northwest Forest Management Plan (FMP). It is an early seral forest stand type and is described in the FMP as:

"The site is occupied by tree seedlings or saplings, and herbs or shrubs. The trees can be conifers or hardwoods. Competition among the trees and other vegetation is not yet resulting in widespread loss of herb and shrub layers. The herbs and /or shrubs are widespread and vigorous. This type includes first year regenerated stands, and continues to the stage when the trees approach crown closure. At that point, the increasing crown closure shades the ground, and causes a significant loss of vigor or death of understory vegetation." (NWFMP, Jan. 2001, page C-4)

Our State Forests are actively managed, and we harvest more than 200 million board feet from our lands in Northwestern Oregon every year. Approximately eight percent of the ODF land base in northwest Oregon is currently in the Regeneration Structure stage. The 2008 Annual Operations Plans for State Forest lands in the Northwest Oregon Area propose modified clearcut and retention harvest operations that will maintain approximately the current level of the Regeneration Structure. Over time, these stands will develop into older seral stages (other stand structures) that will provide habitat for additional wildlife species, while new Regeneration Structure stands are created by harvest proposed in future Annual Operations Plans.

All of the department's operations are reviewed by our department's staff of biologists as well as biologists from the Oregon Department of Fish and Wildlife (ODFW). In addition to reviewing each operation, the ODFW biologists participate in all levels of State Forests planning, including long-term strategic plans. They recognize the importance of Regeneration stand structure to the

deer and elk populations that utilize State Forest lands and help to insure that suitable habitat is available and of good quality for many early-seral dependent species, along with mid- and late-seral species too.

We appreciate and share your concern regarding the availability of suitable habitat for deer and elk. Our FMP requires that we maintain a mix of forest types across State Forest lands. We will continue to coordinate our efforts with our sister agency ODFW so that we manage for consistent wildlife goals and objectives.

Thank you again for your valued comments, please feel free to contact me if you have any further questions. Please also note that we will be posting all public comments that were received regarding the Annual Operations Plans and our response to each one on the department's website this year (http://egov.oregon.gov/ODF/STATE_FORESTS/Annual_Operations_Plans.shtml). Each commenter will be identified by their first name and the first letter of their last name. If you have any questions regarding the posting of your comments on the website, please contact the State Forests Planning Specialist, Roger Welty, at (503) 945-7258.

Sincerely,



Nancy Hirsch
Acting State Forests Program Director

Pacific Rainforest Wildlife Guardian

2008 Oregon State Forest Timber Sales

Public Comment of Marcia K. D.

March 11, 2007

Oregon Department of Forestry
State Forest Planning Division
2600 State Street
Salem, Oregon, 97310

All State Forests:

Please stop clear-cutting everything. Clear-cuts destroy wildlife habitat, watershed protection, damage the climate, and cause water sources to dry up too early in summer. Herbicide from clear-cuts finds it's way into drinking water, poisoning children impairing their mental and emotional development, causing Spider Brain Cancer in young adults, Hodgkin's and Parkinson's disease in older adults and neurological damage in everybody including ODF employees.

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Pacific Rainforest Wildlife Guardians

There is no sustainable forestry in a clear-cut. Economic benefit is gone for a life time. Clear-cuts slide and cause blow down. Clear-cuts cause the rich top soil to wash away in winter rains. Reforestation is less likely to succeed in a clear-cut. Growth is reduced by evaporation in a clear-cut.

There is nothing good about clear-cuts. Stop clear-cutting our economic future. Stop clear-cutting our health and public safety. Stop clear-cutting our scenic areas. Stop clear-cutting our recreational areas. Stop clear-cutting our watersheds and flood control, please.

Please use partial shade for weed control, not toxic chemicals. ODF was doing so well under James Brown. Why are we headed back into the dark ages?

If pollution of the waters or harm to threatened wildlife might occur as a result of any of the foregoing sales or activities, I would sue under the Endangered Species Act or Clean Water Act.

Thank you,



Marcia K. D.



Oregon

Theodore R. Kulongoski, Governor

Department of Forestry

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July 12, 2007



"STEWARDSHIP IN FORESTRY"

Dear Marcia D. ...

Thank you for your comments on the 2008 Annual Operations Plans. This letter will address your comments that had a state-wide scope; you will receive separate letters from Astoria, Tillamook, and North Cascade districts regarding your comments specific to them.

Clearcutting, or more correctly modified clearcuts, as applied on state forests are designed to emulate disturbance regimes that have historically affected the distribution of forests in NW Oregon. A modified clearcut harvest system is a tool used to meet a number of management objectives. One of the objectives is to provide Regeneration stand type or early-seral stand structure. Regeneration is one of the four stand types addressed in the Northwest Forest Management Plan:

"The site is occupied by tree seedlings or saplings, and herbs or shrubs. The trees can be conifers or hardwoods. Competition among the trees and other vegetation is not yet resulting in widespread loss of herb and shrub layers. The herbs and /or shrubs are widespread and vigorous. This type includes first year regenerated stands, and continues to the stage when the trees approach crown closure. At that point, the increasing crown closure shades the ground, and causes a significant loss of vigor or death of understory vegetation." (NWFMP C-4)

Early-seral stand structure was defined as the same period: from the time of the stand replacement disturbance until newly established trees fully occupy the site. As more information about the importance of this stand structure becomes available; the quantity and quality of early-seral habitat is beginning to become more of an issue. A recent symposium held at Oregon State University highlighted the importance of early forest development (proceedings from the symposium can be heard and viewed at: <http://oregonstate.edu/media/archives/>). This stage is important to many birds and mammals. Most of the speakers stressed that the quality of this early habitat was dependent on the amount of legacy components that remained on the site after the disturbance. It was also pointed out that this early-seral period is shorter in managed forests. The amount and type of

legacy components retained after harvest are considered when developing the management prescription for a modified clearcut. Modified clearcuts prescribed correctly will provide early-seral wildlife habitat, protect soils and streams while providing diverse, productive forests for the future.

Reforestation success is very high on lands managed by the Department of Forestry. In almost all cases reforestation results exceed the requirements of the Oregon Forest Practices Act. In those rare instances where reforestation does not meet management objectives, reforestation efforts continue until the objectives are attained. Modified clearcuts provide an almost optimal environment for the survival and growth of seedlings. The reduction of competition for light and moisture from the overstory trees is reduced, allowing planted seedlings to rapidly become established. This is especially true for tree species that are not very shade tolerant, such as Douglas-fir, red alder, western white pine, and to some extent noble fir. The same conditions also allow natural regeneration to occur. Several studies show that survival and growth decline as the density of the overstory increases (Newton 2001¹, 2003²; Chan 2006³). In studies that combined thinning and underplanting the overstory density needed to be reduced substantially to provide adequate sunlight for survival and reasonable growth.

According to the Northwest Forest Management Plan, the desired proportion of regeneration, early-seral structure type is 5-15 percent of the landscape on each district. At the time the Districts' Implementation Plans were approved, the range for regeneration was 3- 28 percent. The highest in the range, 28%, was found on a district whose forest is composed of relatively young trees. The amount of regeneration structure type on this district has been reduced to 14% at the present time. The other districts range from 3-10.5%.

Herbicides, fire, mechanized equipment, as well as no treatment are components of an integrated vegetation management program to ensure that young trees are established in a safe and timely manner. The use of herbicides is one of the tools for reducing the amount of competing vegetation during the establishment of young trees. Herbicides which have undergone extensive safety testing and registered with the Environmental Protection Agency (EPA) are used. During the registration process a minimum of 120 tests are conducted to demonstrate that the herbicide can be used without posing unreasonable adverse effects to humans or the environment. These tests indicate that none of the commonly used forestry herbicides are carcinogenic. They are applied according to the label instructions and Oregon Forest Practices Act.

¹ Newton, M., Elizabeth C. Cole. 2001. Stand density and understory regulation: eighth annual progress report, Oct. 2000-Sept.2001, Forest and Rangeland Ecosystem Center, Biological Research Division, U. S. Geological Survey, Oregon State University

² Newton, M., Elizabeth C. Cole. 2003. Stand density regulation and understory regeneration. U. S. Geological Survey, Biological Resources Division. 70 pp

³ Chan, S. S., David J. Larson, Kathaleen G. Maas-Hebner, William H. Emmingham, Stuart R. Johnson, and Danail A. Mikowski. 2006. Overstory and understory development in thinned and underplanted Oregon Coast Range Douglas-fir stands. *Can. J. For. Res.* 36: pp. 2696-2711.

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Nancy Hirsch
Acting State Forests Program Director